

Superior Court of California
County of Sacramento
720 Ninth Street
Sacramento, CA 95814

Receipt No: GDS-2024-0069455.1
Payor: Class Action
Date: 02/13/2024
Time: 2:56 PM

CASE # 24WM000034

PROTECT KIDS CALIFORNIA, et al. vs ROB BONTA, IN HIS

194 - Complaint or other 1st Paper

435.00

Case Total:

435.00

Check #: 44303

435.00

woltmos

Total Paid:

435.00

Change:

0.00

Balance:

0.00

SUPERIOR COURT OF CALIFORNIA COUNTY OF SACRAMENTO		Reserved for Clerk's File Stamp
COURTHOUSE ADDRESS: Gordon D. Schaber Superior Court 720 Ninth Street, Sacramento, CA 95814		FILED Superior Court of California County of Sacramento 02/13/2024 Sarah Woltmon, Deputy
PLAINTIFF/PETITIONER: Protect Kids California et al		
DEFENDANT/RESPONDENT: Rob Bonta, in his official capacity as Attorney General of the State of California et al		
NOTICE OF CASE ASSIGNMENT Proceeding for Writ of Mandate and/or Prohibition		CASE NUMBER: 24WM000034

This case has been assigned for all purposes to the judicial officer indicated below pursuant to rule 3.734 of the California Rules of Court and Sacramento Superior Court Local Rule 2.26; it is exempt from the requirements of the Trial Court Delay Reduction Act and the Case Management Program under Chapter 2 of the Sacramento Superior Court Local Rules.

JUDGE	COURT LOCATION	DEPARTMENT
Stephen P. Acquisto	Gordon D. Schaber Superior Court	Department 36

The petitioner shall serve all parties with a copy of this order and a copy of the Sacramento Superior Court Guide to the Procedures for Prosecuting Petitions for Prerogative Writs. The Guide is available in Room 102 of the courthouse, from the clerk of the department to which this matter has been assigned, and on the "Civil" page of the Sacramento Superior Court internet website (www.saccourt.ca.gov).

Scheduling

Contact the clerk in the assigned department to schedule any judicial proceedings in this matter, including hearings on ex parte applications and noticed motions.

JUDGE	DEPARTMENT	PHONE
Hon. Jennifer K. Rockwell	4	(916) 874-5527
Hon. Shelleyanne W.L. Chang	21	(916) 874-5924
Hon. James P. Arguelles	32	(916) 874-5682
Hon. Stephen P. Acquisto	36	(916) 874-7661

Other Information

Pursuant to Local Rule 2.26, all documents submitted for filing in this case shall be filed in person at the Civil Front Counter (Room 102) or by mail addressed to the Clerk of the Sacramento Superior Court, Attn: Civil Division-Room 102, with the exception of certain documents filed on the day of the hearing. For specific requirements, please see the Sacramento Superior Court Guide to the Procedures for Prosecuting Petitions for Prerogative Writs.

Dated: 02/13/2024

By:

/s/ S. Woltmon
Sarah Woltmon, Deputy Clerk

NOTICE OF CASE ASSIGNMENT

Filed
Superior Court of California,
Sacramento
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wofmos
By _____, Deputy
24WM000034

1 Nicole C. Pearson, SBN 265350
2 C. Erin Friday, SBN 189742
3 LAW OFFICE OF NICOLE C. PEARSON
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5 Newport Beach, CA 92663
6 (424) 272-5526
7 nicole@FLTJllp.com
8 erin@FLTJllp.com

9 LIBERTY JUSTICE CENTER
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12 Chicago, Illinois 60654
13 (312) 637-2280
14 erae@ljc.org

15 Attorneys for Petitioners
16 PROTECT KIDS CALIFORNIA and
17 JONATHAN ZACHRESON

18 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
19 **COUNTY OF SACRAMENTO**

20 PROTECT KIDS OF CALIFORNIA and
21 JONATHAN ZACHRESON,
22 Individually and on behalf of PROTECT
23 KIDS CALIFORNIA

24 Petitioners,

25 v.

26 ROB BONTA, in his official capacity as
27 Attorney General of California and
28 DOES 1-50, inclusive,

Respondents.

Case No.

**DECLARATION OF C. ERIN FRIDAY
IN SUPPORT OF WRIT PETITION**

Department:
Judge:

Action filed:
Trial date: None set

DECLARATION OF CLARE ERIN FRIDAY

I, C. ERIN FRIDAY, declare as follows:

1. I am an attorney at law licensed to practice in the State of California and am a

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18 SUPERIOR COURT OF THE STATE OF CALIFORNIA
19 COUNTY OF SACRAMENTO

20 PROTECT KIDS CALIFORNIA and
21 JONATHAN ZACHRESON, Individually
22 and on behalf of PROTECT KIDS
23 CALIFORNIA

24 Petitioner,

25 v.

26 ROBERT BONTA, in his official capacity
27 as Attorney General of the State of
28 California; and DOES 1-50, inclusive,

Respondents.

Case No. ___

DECLARATION OF ROBERT LEE, IN
SUPPORT OF PETITIONERS'
APPLICATION FOR A WRIT OF
MANDATE AND DECLARATORY
RELIEF

Date: TBD
Time: TBD
Dept: TBD
Judge: TBD

Action Filed: February 9, 2024
Trial Date: Not set

I, Robert Lee, declare:

1. I am of legal age and am competent to make this declaration. I have volunteered to testify in support of Petitioners' application for a Writ of Mandate Declaratory Relief.
2. I am a resident of Carlsbad, California.
3. I learned about the Protect Kids California Ballot Initiative ("Initiative") in August 2023 when it was described as policies to: (a) require parental notification from schools when

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13 **COUNTY OF SACRAMENTO**

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15 JONATHAN ZACHRESON, Individually
16 and behalf of PROTECT KIDS
CALIFORNIA

17 Petitioners,

18 v.

19 ROB BONTA, in his official capacity as
20 Attorney General of California and
21 DOES 1-50, inclusive,

22 Respondents.

Case No.

**DECLARATION OF KOREY WELLS IN
SUPPORT OF WRIT PETITION**

Department:
Judge:

Action filed:
Trial date: None set

23 **DECLARATION OF KOREY WELLS**

24 I, KOREY WELLS, declare as follows:

25 1. I am a California resident residing in Tulare County. I am over the age of 18 and
26 have personal knowledge of the matters set forth below and, if called as a witness, could and
27 would testify competently to them under oath.

28

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 Sacramento
 02/13/2024
 wolftmos
 By _____, Deputy
 24WM000034

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
 Nicole C. Pearson (SBN265350); C. Erin Friday (SBN 189742)
 LAW OFFICE OF NICOLE C. PEARSON
 3421 Via Oporto, Ste. 201, Newport Beach, Calif. 92663
 TELEPHONE NO.: (949) 200-9170 FAX NO.:
 EMAIL ADDRESS: nicole@FLTJllp.com; erin@fltjllp.com
 ATTORNEY FOR (Name): Petitioners Protect Kids CA, Jonathan Zachreson

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SACRAMENTO
 STREET ADDRESS: 720 Ninth Street
 MAILING ADDRESS: SAME
 CITY AND ZIP CODE: Sacramento 95814-1380
 BRANCH NAME: Superior Court

CASE NAME:
 Protect Kids CA, Zachreson v. Bonta, et al.

CIVIL CASE COVER SHEET
 Unlimited (Amount demanded exceeds \$35,000)
 Limited (Amount demanded is \$35,000 or less)

Complex Case Designation
 Counter Joinder
 Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

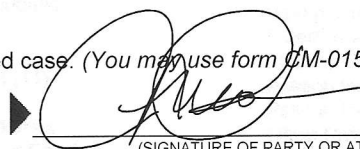
CASE NUMBER:
 JUDGE:
 DEPT.:

Items 1-6 below must be completed (see instructions on page 2).

1. Check **one** box below for the case type that best describes this case:
- | | | |
|---|--|---|
| <p>Auto Tort</p> <input type="checkbox"/> Auto (22)
<input type="checkbox"/> Uninsured motorist (46) <p>Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</p> <input type="checkbox"/> Asbestos (04)
<input type="checkbox"/> Product liability (24)
<input type="checkbox"/> Medical malpractice (45)
<input type="checkbox"/> Other PI/PD/WD (23) <p>Non-PI/PD/WD (Other) Tort</p> <input type="checkbox"/> Business tort/unfair business practice (07)
<input type="checkbox"/> Civil rights (08)
<input type="checkbox"/> Defamation (13)
<input type="checkbox"/> Fraud (16)
<input type="checkbox"/> Intellectual property (19)
<input type="checkbox"/> Professional negligence (25)
<input type="checkbox"/> Other non-PI/PD/WD tort (35) <p>Employment</p> <input type="checkbox"/> Wrongful termination (36)
<input type="checkbox"/> Other employment (15) | <p>Contract</p> <input type="checkbox"/> Breach of contract/warranty (06)
<input type="checkbox"/> Rule 3.740 collections (09)
<input type="checkbox"/> Other collections (09)
<input type="checkbox"/> Insurance coverage (18)
<input type="checkbox"/> Other contract (37) <p>Real Property</p> <input type="checkbox"/> Eminent domain/Inverse condemnation (14)
<input type="checkbox"/> Wrongful eviction (33)
<input type="checkbox"/> Other real property (26) <p>Unlawful Detainer</p> <input type="checkbox"/> Commercial (31)
<input type="checkbox"/> Residential (32)
<input type="checkbox"/> Drugs (38) <p>Judicial Review</p> <input type="checkbox"/> Asset forfeiture (05)
<input type="checkbox"/> Petition re: arbitration award (11)
<input checked="" type="checkbox"/> Writ of mandate (02)
<input type="checkbox"/> Other judicial review (39) | <p>Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403)</p> <input type="checkbox"/> Antitrust/Trade regulation (03)
<input type="checkbox"/> Construction defect (10)
<input type="checkbox"/> Mass tort (40)
<input type="checkbox"/> Securities litigation (28)
<input type="checkbox"/> Environmental/Toxic tort (30)
<input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) <p>Enforcement of Judgment</p> <input type="checkbox"/> Enforcement of judgment (20) <p>Miscellaneous Civil Complaint</p> <input type="checkbox"/> RICO (27)
<input type="checkbox"/> Other complaint (not specified above) (42) <p>Miscellaneous Civil Petition</p> <input type="checkbox"/> Partnership and corporate governance (21)
<input type="checkbox"/> Other petition (not specified above) (43) |
|---|--|---|

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- | | |
|--|--|
| a. <input type="checkbox"/> Large number of separately represented parties | d. <input type="checkbox"/> Large number of witnesses |
| b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve | e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court |
| c. <input type="checkbox"/> Substantial amount of documentary evidence | f. <input type="checkbox"/> Substantial postjudgment judicial supervision |
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): Four (4)
5. This case is is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: 02/12/2024
 Nicole C. Pearson
 (TYPE OR PRINT NAME)


 (SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

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By _____, Deputy
24WM000034

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13 COUNTY OF SACRAMENTO

14 PROTECT KIDS CALIFORNIA and
15 JONATHAN ZACHRESON, Individually
16 and behalf of PROTECT KIDS
17 CALIFORNIA

18 Petitioners,

19 v.

20 ROB BONTA, in his official capacity as
21 Attorney General of California and
22 DOES 1-50, inclusive,

23 Respondents.

Case No.

**PETITIONERS' REQUEST FOR
JUDICIAL NOTICE IN SUPPORT OF
WRIT PETITION**

Department:
Judge:

Action filed:
Trial date: None set

23 **TO THIS HONORABLE COURT AND TO ALL PARTIES AND COUNSEL OF**
24 **RECORD:**

25 PLEASE TAKE NOTICE that pursuant to *Evidence Code*, sections 451 and 452,
26 Petitioners PROTECT KIDS CALIFORNIA and JONATHAN ZACHRESON (hereinafter
27 collectively "Petitioners") will and hereby do request that this Court take judicial notice of the
28 following in support of Petitioners' Writ Petition, filed currently herewith:

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1 Nicole C. Pearson, SBN 265350
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Respondents.

Case No.

ELECTION MATTER PRIORITY (CCP §35)

VERIFIED PETITION FOR:

- (1) WRIT OF MANDATE (ELECTION CODE § 13314)
- (2) DECLARATORY RELIEF
- (3) VIOLATION OF FREE SPEECH (CAL. CONST., ART. 1, SEC. 2)
- (4) VIOLATION OF FREE SPEECH (U.S. CONST., AMEND. I)

BY FAX