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9 Attorneys for Defendants
10 City of Los Angeles, et al

11 UNITED STATES DISTRICT COURT

12 CENTRAL DISTRICT OF CALIFORNIA

13 CARL MITCHELL, et al,

14 Plaintiffs,

15 v.

16 CITY OF LOS ANGELES, et al.,

17 Defendants.

CASE NO. CV16-01750 SJO(JPR)

**DEFENDANT CITY OF LOS
ANGELES'S REQUEST FOR
TIME TO FILE WRITTEN
OPPOSITION TO PLAINTIFFS'
TEMPORARY RESTRAINING
ORDER**

18 Date: March 31, 2016

19 Ctrm: 1 – 2nd Floor

20 Judge: Hon. S. James Otero

1 **TO THE CLERK, ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2
3 Defendant City of Los Angeles hereby applies for an extension of time of 10
4 days, up to and including April 11, 2016, within which to file an opposition to
5 plaintiffs' request for temporary restraining order.
6

7 The City was emailed the moving papers and bulk of the exhibits only late
8 yesterday afternoon. The City has been advised by counsel for Plaintiffs that it will
9 be given a complete set of exhibits by today. The documents which the City has
10 received so far are voluminous, and time is required to check the authorities,
11 present counter authorities where appropriate, review the evidence and present
12 counter-evidence where appropriate.
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14

15 DATED: March 31, 2016

MICHAEL N. FEUER, City Attorney
THOMAS H. PETERS, Chief Assistant City Attorney
ERIC BROWN, Deputy City Attorney

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19 By: /s/ Eric Brown

20 ERIC BROWN

21 Attorneys for Defendants
22 CITY OF LOS ANGELES, ET AL
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DECLARATION OF ERIC BROWN

I, Eric Brown, declare as follows:

1. I am an attorney duly licensed to practice law before all of the courts of this district, and am a Deputy City Attorney in the Office of the Los Angeles City Attorney, attorneys of record for Defendant City of Los Angeles. I have personal knowledge of the facts contained herein, and if called to testify about those facts, I could and would do so competently.

2. On March 30, 2016, at approximately 4 p.m., I received seven declarations and 20 pages of legal points and authorities in support of the Plaintiffs' request for a temporary restraining order (TRO). While it is my understanding that at some point counsel for Plaintiff informed the head of the Civil Branch of the City Attorney's Office of her general intent to bring a TRO, the early evening of March 30th was the first time to my knowledge that the Office was presented with the specific bases for counsel's request. It was certainly the first time that I, the handling attorney, was presented with that basis. The bases presented in the TRO paperwork goes far beyond what is pleaded in the complaint as to the basis of the TRO request.

3. The TRO request appears to have taken at least a week, if not weeks, to put together in light of the sheer amount of information contained in the papers. This seems to mitigate against an immediate need for the TRO as Plaintiffs took the time

1 to obtain and assemble this information from a variety of sources. The sheer
2 amount of information also mitigates in favor of the request for time to respond
3 being made by the City.
4

5 4. My request for 10 days was not a random number: based on the progress I
6 have made so far in preparing a response to the TRO, the breadth of the information
7 that I have determined is necessary to respond to the TRO, and the time anticipated
8 to complete the response, I believe that I will have all of the documentary and
9 testamentary evidence necessary to fully respond to the TRO finalized in that time.
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12 I declare under penalty of perjury that the foregoing is true and correct.

13 Executed this 31st day of March, 2016, at Los Angeles, California.
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17 /s/ Eric Brown
18 Eric Brown, Declarant
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