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9 Attorneys for Respondent/Defendant JOHN CHIANG,  
California State Controller

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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **COUNTY OF SAN FRANCISCO**

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14 CALIFORNIA ATTORNEYS,  
ADMINISTRATIVE LAW JUDGES AND  
15 HEARING OFFICERS IN STATE  
EMPLOYMENT, GLEN GROSSMAN,  
16 MARK HENDERSON, GEOFFREY SIMS,  
and DOES 1-500,

17  
18 Petitioners/Plaintiffs,

19 vs.

20 ARNOLD SCHWARZENEGGER, as  
Governor of the State of California; DAVID  
21 GILB, as Director of the Department of  
Personnel Administration; JOHN CHIANG,  
22 Controller of the State of California; JAN  
FRANK, as President of the STATE  
23 COMPENSATION INSURANCE FUND, and  
DOES 1-50,

24 Respondents/Defendants.

) Case No. CPF-09-509205

) **CONTROLLER'S RESPONSE TO**  
) **PETITION FOR WRIT OF MANDATE**  
) **AND COMPLAINT FOR INJUNCTIVE**  
) **AND DECLARATORY RELIEF**

) Date: February 20, 2009  
) Time: 9:30 a.m.  
) Dept: 301

) **Exempt from Fees (Gov. Code § 6103)**

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27 Respondent/Defendant JOHN CHIANG, California State Controller, respectfully submits  
28 this response to the Petition For Writ of Mandate and Complaint For Injunctive and Declaratory

1 Relief, filed on February 10, 2009, by Petitioners/Plaintiffs CALIFORNIA ATTORNEYS,  
2 ADMINISTRATIVE LAW JUDGES AND HEARING OFFICERS IN STATE  
3 EMPLOYMENT, GLEN GROSSMAN, MARK HENDERSON, and GEOFFREY SIMS.

4 The Controller takes no position with respect to the Petition For Writ of Mandate and  
5 Complaint For Injunctive and Declaratory Relief.

6  
7 Dated: March 9, 2009

OFFICE OF THE STATE CONTROLLER

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9 By: Shawn D. Silva  
10 SHAWN SILVA, Senior Staff Counsel  
11 Attorney for Respondent/Defendant  
12 JOHN CHIANG, California State Controller  
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1 **California Attorneys, Administrative Law Judges and Hearing Officers in State Employment v.**  
2 **Arnold Schwarzenegger, et al.**  
3 **San Francisco County Superior Court Case No. CPF-09-509205**

4 **PROOF OF SERVICE**

5 I am employed in the County of Sacramento, State of California. At the time of service, I was at least 18  
6 years of age, a United States citizen employed in the county where the mailing occurred, and not a party to the  
7 within action. My business address is 300 Capitol Mall, Suite 1850, Sacramento, CA 95814.

8 On March 10, 2009, I served the foregoing document entitled:

9 **CONTROLLER'S RESPONSE TO PETITION FOR WRIT OF MANDATE AND  
10 COMPLAINT FOR INJUNCTIVE AND DECLARATORY RELIEF**

11 on all interested parties in this action by placing a true and correct copy thereof enclosed in a sealed envelope,  
12 addressed as follows:

13 Will Yamada, Deputy Counsel  
14 DEPARTMENT OF PERSONNEL  
15 ADMINISTRATION  
16 1515 S Street, North Building, Suite 400  
17 Sacramento, CA 95811  
18 E-Mail: [willyamada@dpa.ca.gov](mailto:willyamada@dpa.ca.gov)

19 David Tyra  
20 KRONICK, MOSKOVITZ, TIEDEMANN & GIRARD  
21 400 Capitol Mall, 27th Floor  
22 Sacramento, CA 95814  
23 E-Mail: [dtyra@kmtg.com](mailto:dtyra@kmtg.com)

24 Patrick J. Whalen  
25 LAW OFFICES OF BROOKS ELLISON  
1725 Capitol Avenue  
Sacramento, CA 95814  
E-Mail: [counsel@calattorneys.org](mailto:counsel@calattorneys.org)

Alison Sultan White  
MANATT, PHELPS & PHILLIPS, LLP  
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Los Angeles, CA 90064  
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**BY MAIL**

I placed the envelope for collection and processing for mailing following this business's ordinary practice with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

**BY ELECTRONIC TRANSMISSION**

In addition to the manner of service indicated above, a copy was sent by electronic transmission to the above-listed party.

**BY PERSONAL SERVICE**

I caused to be delivered by hand to the above-listed addressees.

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made. I declare under penalty of perjury under the laws of California that the foregoing is true and correct. Executed on March 10, 2009, at Sacramento, California.

  
Amber A. Camarena