

BELL, McANDREWS & HILTACHK, LLP

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June 5, 2012

Diana M. Serafin

~~1234567890~~
Murrieta, CA 92562

Arcia Nielson

~~1234567890~~
Murrieta, CA 92562

Re: Flynn v. Vinson, et al.

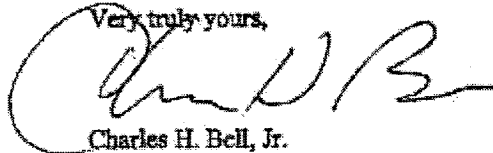
Dear Ms. Serafin & Ms. Nielson:

We are counsel for the Petitioner, Steven Flynn, who has filed a Petition for Writ of Mandate in Riverside County Superior Court which seeks to remove the initiative measure in the City of Murrieta regarding enforcement of the red light camera automated traffic enforcement system from the ballot. We are serving you as proponents of the initiative measure, and by law and practice, have named you as "Real Parties In Interest."

We expect shortly to seek an ex parte appearance in Riverside Superior Court to seek a hearing date on our petition. We would request that if you retain legal counsel, that you ask such counsel to contact either Mr. Paul Gough or me about this so that we may coordinate in a way that is most efficient to get our further pleadings to you for response.

Thank you very much for your consideration.

Very truly yours,



Charles H. Bell, Jr.

CHB:sd

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Charles H. Bell, Jr. (SBN 060553) Paul Gough (SBN 075502) Bell, McAndrews & Hiltachk, LLP 455 Capitol Mall, Suite 600, Sacramento, CA 95814 TELEPHONE NO.: (916) 442-7757 FAX NO.: (916) 442-7759 ATTORNEY FOR (Name): Petitioner, STEPHEN FLYNN		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Riverside STREET ADDRESS: 4050 Main Street MAILING ADDRESS: 4050 Main Street CITY AND ZIP CODE: Riverside, CA 92501 BRANCH NAME: Historic Courthouse		
CASE NAME: FLYNN vs. VINSON, et al.		
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)	Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> 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:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <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) Non-PI/PD/WD (Other) Tort <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) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <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) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <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)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <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) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)
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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): **two**
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: **June 4, 2012**
 Charles H. Bell, Jr.

(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.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE
4050 Main Street
Riverside, CA 92501
www.riverside.courts.ca.gov

NOTICE OF ASSIGNMENT TO DEPARTMENT FOR CASE MANAGEMENT PURPOSES

STEPHEN FLYNN

vs.

CASE NO: RIC 1208403

A. KAY VINSON

TO: BELL MCANDREWS & HILTACHK LLP
455 CAPITOL MALL SUITE 801
SACRAMENTO CA 95814

This case has been assigned to the HONORABLE Commissioner Pamela A Thatche in Department 04 for case management purposes.

Any disqualification pursuant to CCP section 170.6 shall be filed in accordance with that section.

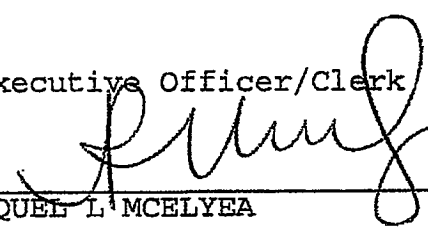
The filing party shall serve a copy of this notice on all parties.

CERTIFICATE OF MAILING

I certify that I am currently employed by the Superior Court of California, County of Riverside and I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with the mailing of correspondence. Such correspondence is deposited in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served a copy of the foregoing Notice and Order of Assignment to Department for Case Management Purposes on this date by depositing said copy as stated above.

Dated: 06/05/12

Court Executive Officer/Clerk

By  Deputy Clerk
RICQUEL L. MCELYEA

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE
4050 Main Street
Riverside, CA 92501
www.riverside.courts.ca.gov

NOTICE OF STATUS HEARING

STEPHEN FLYNN

vs.

Case No. RIC1208403

A. KAY VINSON

TO: BELL MCANDREWS & HILTACHK LLP
455 CAPITOL MALL SUITE 801
SACRAMENTO CA 95814

Notice is hereby given that a Status Hearing has been set for 07/10/12 at 8:30 in Department 04. If a judgment or dismissal is filed before 07/10/12, this hearing will be taken off calendar.

CERTIFICATE OF MAILING

I certify that I am currently employed by the Superior Court of California, County of Riverside, and that I am not a party to this action or proceeding. In my capacity, I am familiar with the practices and procedures used in connection with the mailing of correspondence. Such correspondence is deposited in the outgoing mail of the Superior Court. Outgoing mail is delivered to and mailed by the United States Postal Service, postage prepaid, the same day in the ordinary course of business. I certify that I served a copy of the foregoing notice on this date, by depositing said copy as stated above.

Dated: 06/05/12

Court Executive Officer/Clerk

By:


RICOUEL L. MCELVEA, Deputy Clerk