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CONFORMED COPY
ORIGINAL FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF LOS ANGELES

MAY 08 2012

John A. Clark, EXECUTIVE Officer/Clerk
BY Regina Biliano Deputy

SUPERIOR COURT FOR THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

BC 484190

HAROLD P. STURGEON,
Plaintiff,

v.

THE CITY OF LOS ANGELES, a municipal corporation; RICHARD E. DROOYAN, in his official capacity as President of the Los Angeles Board of Police Commissioners; JOHN A. MACK, in his official capacity as Vice President of the Los Angeles Board of Police Commissioners; ROBERT M. SALTZMAN, in his official capacity as a member of the Los Angeles Board of Police Commissioners; ALAN J. SKOBIN, in his official capacity as a member of the Los Angeles Board of Police Commissioners; and DEBRA WONG YANG, in her official capacity as a member of the Board of Police Commissioners; and CHARLIE BECK, in his official capacity as Chief of Police of the Los Angeles Police Department, and

Defendants.

) Case No.
)
) **PLAINTIFF'S NOTICE OF RELATED CASE**
)
) Assigned to:

1 TO THE COURT AND ALL PARTIES IN THIS ACTION:

2 NOTICE IS HEREBY GIVEN THAT:

3
4 1. A case entitled *Los Angeles Police Protective League v. City of Los Angeles, Charles*
5 *Beck, and Does 1 through XX* (“*Los Angeles Protective League*”), which was filed on or about April 18,
6 2012, is currently pending before this Court.

7
8 2. Plaintiff herein believes that *Los Angeles Protective League* is a related case under
9 several subsections of Rule 3.300 of the California Rules of Court.

10
11 3. Rule 3.300(a)(1) of the California Rules of Court provides that cases are related if they
12 “involve the same parties and are based on the same or similar claims.”

13
14 4. Rule 3.300(a)(2) of the California Rules of Court provide that cases are related if they
15 “arise from the same or substantially identical transactions, incidents, or events requiring the
16 determination of the same or substantially identical questions of law or fact”

17
18 5. The City of Los Angeles and Charles Beck, Chief of Police of the Los Angeles Police
19 Department (“LAPD”) are both Defendants in *Los Angeles Protective League* and this matter.

20
21 6. *Los Angeles Protective League* and this matter both involve Special Order 7, entitled
22 “Community Caretaking Doctrine and Vehicle Impound Procedures - Established,” which was issued by
23 Defendant Beck on or about April 10, 2012, and became effective on April 22, 2012.

24
25 7. Both lawsuits contend that Special Order 7, which purports to regulate the impounding of
26 vehicles in the City of Los Angeles by “establish[ing] the procedures for impounding vehicles from
27 unlicensed drivers, and drivers with suspended or revoked licenses in the field, at the scene of traffic
28 collisions and at driving under the influence (DUI) checkpoints,” conflicts with provisions of the


1 California Vehicle Code, including California Vehicle Code §§ 14602.6 and 14607.6, which govern the
2 impounding of vehicles driven by unlicensed drivers.

3
4 8. Both lawsuits seek declaratory relief, pursuant to California Code of Civil Procedure §
5 1060, in the form of a judicial determination regarding whether Defendants in their respective matters
6 possessed lawful authority to issue Special Order 7 and whether the provisions of Special Order 7
7 conflict with the California Vehicle Code, including California Vehicle Code §§ 14602.6 and 14607.6.

8
9 9. Both lawsuits also seek injunctive relief prohibiting the enforcement of Special Order 7.

10 10. Pursuant to Rule 3.300(d) of the California Rules of Court, this notice is being served on
11 all parties in *Los Angeles Protective League*. See attached Proof of Service by Mail.

12 DATED: May 8, 2012

13
14 By: 
15 Sterling E. Norris (SBN 040993)
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26 *Attorneys for Plaintiff*

1 **PROOF OF SERVICE BY MAIL**

2 I am employed in the City of San Marino, California. I am over the age of 18 and not a party to
3 the within action. My business address is 2540 Huntington Drive, Suite 201, San Marino, CA 91108.

4 On May 8, 2012, I served the foregoing document:

5 **NOTICE OF RELATED CASE**

6
7 on the interested parties in this action by placing a true and correct copy thereof in a sealed envelope
8 addressed as follows:

9 **SEE ATTACHED SERVICE LIST**

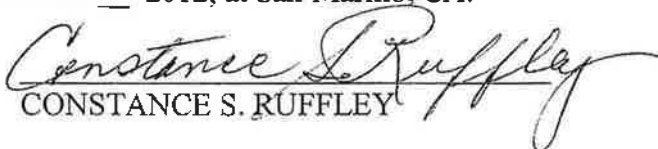
10 [X] **BY MAIL:** I caused such envelope to be deposited in the U.S. mail, with postage thereon fully
11 prepaid, at San Marino, CA. I am "readily familiar" with the firm's practice of collecting and
12 processing correspondence for mailing. Under that practice, it would be deposited with the U.S.
13 Postal Service on that same day, with postage thereon fully prepaid, at San Marino, CA in the
14 ordinary course of business. I am aware that on motion of the party served, service is presumed
invalid if postal cancellation date or postage meter date is more than one day after date of deposit
for mailing affidavit.

15 [] **BY FEDERAL EXPRESS:** I placed such envelope for deposit in the Federal Express drop slot
16 for service by Federal Express on the next business day. I am "readily familiar with the firm's
17 practice of collection and processing correspondence for mailing. Under that practice, it would
18 be deposited with Federal Express on that same day at San Marino, CA. in the ordinary course of
business. I am aware that on motion of the party served, service is presumed invalid if service is
more than one day after date of deposit for express service in affidavit.

19 [] **BY PERSONAL SERVICE:** I delivered such envelope to the offices of the addresses(s) with
20 delivery time prior to 5:00 p.m. on the date specified above.

21 I declare that I am employed in the office of a member of the bar of this Court at whose direction
22 the service was made.

23 I declare under penalty of perjury of the laws of the State of California that the foregoing is true
24 and correct and that this declaration was executed on May 8, 2012, at San Marino, CA.

25 
26 **CONSTANCE S. RUFFLEY**

1 SERVICE LIST

2 *Counsel for Plaintiff in Los Angeles Police Protective League v. City of Los Angeles,*
3 *Charles Beck, and Does 1 through XX :*

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11 *Defendants in Los Angeles Police Protective League v. City of Los Angeles, Charles*
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