

Allan C. Moore (Bar No. 87892)
Todd A. Williams (Bar No. 197489)
Email: tawilliams@wendel.com
WENDEL, ROSEN, BLACK & DEAN LLP
1111 Broadway, 24th Floor
Oakland, California 94607-4036
Tel: (510) 834-6600
Fax: (510) 834-1928

Charles A. Koss (Bar No. 99864)
**GAGEN MCCOY, MCHAHON, KOSS,
MARKOWITZ & RAINES**
279 Front Street (P.O. Box 218)
Danville, CA 94526
Tel: (925) 837-0585
Fax: (925) 838-5985

Attorneys for Real Party in Interest O'Brien Land
Company, LLC and Anna Maria Dettmer, As
Trustee Of The AMD Family Trust

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF CONTRA COSTA

SONJA TRAUSS, and SAN FRANCISCO
BAY AREA RENTERS FEDERATION ,

Petitioners,

vs.

CITY OF LAFAYETTE, A MUNICIPAL
COMMUNITY, and DOES 1-25,

Respondents.

O'BRIEN LAND COMPANY, LLC and
ANNA MARIA DETTMER, AS TRUSTEE
OF THE AMD FAMILY TRUST,

Real Parties in Interest,

Case No. MSN 15-2077

**REAL PARTIES IN INTEREST'S
REQUEST FOR JUDICIAL NOTICE IN
SUPPORT OF OPPOSITION TO WRIT
OF MANDATE**

Date: January 25, 2017
Time: 9:00 a.m.
Dept.: 9

**ASSIGNED FOR ALL PURPOSES TO:
JUDGE JUDITH CRADDICK, DEPT. 9**

Action Filed: December 8, 2015
Trial Date: None Set

Pursuant to Evidence Code, sections 452(a), (b), (c) and (d), Evidence Code section 453, and California Rules of Court, rule 3.1306(c), Real Parties in Interest O'BRIEN LAND COMPANY, LLC and ANNA MARIA DETTMER, AS TRUSTEE OF THE AMD FAMILY TRUST (collectively, "Real Parties"), respectfully request that this Court take judicial notice of the following documents, true and correct copies of which are attached hereto as **Exhibits 1 through 4**, in support of Real Parties' Opposition to Petitioners Petition for Writ of Mandate:

1.	Senate Republican Caucus Analysis of Bill Number SB 2011, Author Green, et al
2.	Legislative Analyst Report of Senate Bill No. 2011, As Amended in Senate May 19, 1982, 1981-82 Session
3.	Assembly Floor Analysis of AB 325 (Alejo), as Amended September 6, 2013; and
4.	Court Register of Actions in <i>Trauss and Bay Area Renters Federation v. City of Lafayette, et al.</i> (Contra Costa Superior Court Case No. MSN 15-2077) indicating that the petition in this action was served on the City of Lafayette on December 9, 2015

The documents attached as **Exhibits 1, 2 and 3** are subject to judicial notice pursuant to Evidence Code section 452(a), (b) and (c) as legislative history of the enactment of Government Code section 65589.5 pursuant to the adoption of SB 2011 in 1982 (as to **Exhibits 1 and 2**), and an amendment to Government Code section 65009(d) pursuant to the adoption of AB 325 in 2013 (as to **Exhibit 3**). Under California Evidence Code Section 452, California courts may take judicial notice of documents reflecting the legislative history and intent of state statutes. Case law indicates that courts may take judicial notice of a wide range of documents generated as a given statute is being crafted by the State Legislature in order to resolve ambiguities and uncertainties concerning the purpose and the meaning of a statute. (*Quelimane co. v. Stewart Title Guaranty Co.* (1998) 19 Cal.4th 26, 45 n.9.) Such documents include enrolled bill reports to the governor and legislative committees, caucus reports, work sheets and digests. (*People v. Connor* (2004) 115 Cal.App.4th 669, 681 n.3.)

The document attached as **Exhibit 1** is an analysis of SB 2011 prepared by the Senate Republican Caucus. **Exhibit 2** is a report by the Legislative Analyst's office on SB 2011. Both of these documents are relevant to this proceeding in that they indicate that what is now Government

1 Code section 65589.5(j) was intended to apply at the time when a local agency makes an approval
2 or disapproval of a housing development project. This information is relevant to Real Parties'
3 argument that the provisions of the Housing Accountability Act are only triggered when a local
4 agency make an actual decision, i.e., takes a vote, to approve or disapprove a project falling within
5 the ambit of the statute.

6 The document attached as **Exhibit 3** is a the Assembly Floor Analysis of the final version
7 of AB 325 prior to its adoption. This document is relevant to this proceeding in that it indicates
8 that AB 325 removed the Housing Accounting Act from the list of actions that a party could
9 challenge pursuant to Government Code 65009(d) (pertaining to challenges of a housing element
10 adoption or revision) because Housing Accountability Act challenges are "project-specific
11 actions." This information supports Real Parties' argument that Petitioners' Housing
12 Accountability Act claims are barred by the statute of limitations set forth in Government Code
13 section 65009(c)(1).

14 The document attached as **Exhibit 4** is subject to judicial notice pursuant to Evidence
15 Code section 452(d) as a court record of this state. Exhibit 4 is a registry of actions in this case
16 that demonstrates that Petitioners Sonja Trauss and Bay Area Renters Federation served this action
17 on the City of Lafayette on December 9, 2015. **Exhibit 4** is relevant to the pending writ petition
18 as it supports Real Parties' argument that Petitioners failed to timely file and serve this action as
19 required by Government Code section 65009(c)(1).

20 DATED: December 22, 2016

WENDEL, ROSEN, BLACK & DEAN LLP

21
22 By:



23 Todd A. Williams
24 Attorneys for Real Party in Interest O'Brien Land
25 Company, LLC and Anna Maria Dettmer, As
26 Trustee Of The AMD Family Trust
27
28

EXHIBIT 1 to RJN

EXHIBIT 1 to RJN

SENATE REPUBLICAN CAUCUS

SENATOR KENNETH L. MADDY, Chairman

POSITIONS:

SUPPORT: Calif. Council for Environmental and Economic Balance

NEUTRAL: League of Calif. Cities
CSAC

BILL NUMBER: SB 2011

AUTHOR: Greene, et al

AMENDED COPY: Conf. Compl.

Committee Votes:

Senate Floor Vote: 6-10-82 P. 10801

COMMITTEE: LOCAL GOVERNMENT		
BILL NO.	SB 2011	
DATE OF HEARING	6-4-82	
SENATORS	AYE	NO
Ayala	✓	
Craven	✓	
Doolittle	✓	
Ellis	✓	
Foran	✓	
Greene	✓	
Madd	✓	
Marks (Chairman)	✓	
TOTAL	4	0

COMMITTEE: FINANCE		
BILL NO.	SB 2011	
DATE OF HEARING	6-2-82	
SENATORS	AYE	NO
Boatwright	✓	
Campbell	✓	
Dills	✓	
Ellis	✓	
Greene	✓	
Holmquist	✓	
Stacy	✓	
Watson	✓	
Wick	✓	
Wright	✓	
Yerxa	✓	
TOTAL	8	0

Roll Call

The roll was called and the bill was passed by the following vote:
AYES (27)—Senators Ayala, Beverly, Boatwright, Campbell, Carpenter, Craven, Davis, Doolittle, Ellis, Foran, Marz Garcia, Greene, Holmquist, Keene, Maddy, Marks, Mello, Montoya, Nielsen, O'Keefe, Presley, Rains, Sieroty, Speraw, Stern, Vucich, and Watson.
NOES (0)—None.

Bill ordered transmitted to the Assembly.

Assembly Floor Vote: 58-13, 8-24-82

DIGEST

- 1 Assembly Amendments keep the intent of the bill but make changes
- 2 so that the bill:
- 3
- 4 1) Provides that if a court determines an action of a city, county,
- 5 or city and county does not comply with its housing element, the
- 6 local agency must bring its action into compliance within 60 days
- 7 Under specified conditions, the court may extend the compliance
- 8 period an additional 60 days. Amendments drop the qualification
- 9 of environmental report and extends to all "actions" of the local
- 10 agency.
- 11 2) Requires a local agency to base its approval or disapproval of a
- 12 proposed housing development on written findings, as specified.
- 13 Amendments remove subsection (a) as listed in Comments.
- 14
- 15 3) Declares that the California Environmental Quality Act, by it-
- 16 self, does not authorize a public agency to exercise any power,
- 17 including, but not limited to, the imposition of fees or other
- 18 exactions in support of public services or capital improvements.
- 19 (Added by Assembly Amendments.)
- 20
- 21
- 22 Conference Amendments provide that a public agency may exercise
- 23 only those expressed or implied powers provided by law in mitigating
- 24 or avoiding a significant effect of a project; but also permits the
- 25 use of discretionary powers.
- 26
- 27
- 28
- 29
- 30
- 31
- 32

1 as bill requires a city or county to bring its "actions" pursuant
2 to provisions of the law into compliance with the housing element
3 within 60 days after completing any environmental review conducted
4 pursuant to the California Environmental Quality Act. And also
5 provides guidelines for approving or disapproving by a local agency
6 a project to be developed at a lower density.
7

FISCAL EFFECT

Approved: No.

Fiscal Committee: Yes.

Local: Yes.

10
11 ~~STATE MANDATED~~ LOCAL PROGRAM. SB 90 DISCLAIMER.

12
13 Mandated Local Program. To the extent that local jurisdictions
14 may be required to respond in a different manner to court proceedings
15 or orders relating to housing elements, there could be some additional
16 administrative costs.
17

18 If a proposed housing development that was originally disapproved
19 must now be approved as a result of this measure, the locality
20 would experience increased costs for public services. However,
21 these increased costs could be offset by service fees and assess-
22 ments that local agencies are authorized to impose.
23

COMMENTS:

24
25
26
27 Conference Amendments are in response to litigation and questions
28 concerning a public agency's power to impose fees or other exactions
29 on its own authority for public welfare purposes.
30

31 Assembly Amendments extend court jurisdiction over all "actions" of
32 a city, county, or city and county, in regards of the housing element.
33

34 In 1980 the Legislature re-cast the requirements for the housing
35 elements in local general plans. Every county and city had to adopt
36 an adequate housing element by October 1, 1981. Existing law already
37 required that local zoning, subdivision decisions, and public works
38 projects must be consistent with general plans, including their housing
39 elements.
40

41 General plans and zoning ordinances set land use densities, usually
42 expressed as ranges (e.g., six to nine dwelling units per acre).
43 Residential subdivisions must be consistent with these standards. The
44 Subdivision Map Act also requires that local officials disapprove sub-
45 divisions if the site is not suitable for the type or density of the
46 development, if the subdivision causes public health, access, or
47 environmental problems. The courts' review of these decisions is
48 restricted to the administrative record and the burden of proof falls
49 on the challenger, not the county or city.
50
51
52
53
54
55
56
57

EXHIBIT 2 to RJN

EXHIBIT 2 to RJN

Legislative Analyst
May 31, 1982

ANALYSIS OF SENATE BILL NO. 2011 (Greene)
As Amended in Senate May 19, 1982
1981-82 Session

Fiscal Effect:

Cost: Mandated Local Program. Undetermined additional cost, if any, to local jurisdictions for revised responses to court proceedings regarding local general plans and housing elements. Potentially reimburseable.

Revenue: None.

Analysis:

This bill prescribes (1) the period within which local agencies must correct prior actions that do not comply with their housing elements and (2) specific criteria governing the disapproval of proposed housing developments which otherwise conform with local general plans.

Existing law required, effective October 1, 1981, that each city or county bring the housing element of its general plan into conformance with state law. A court may review local housing elements to determine their conformance.

This bill would order a city or county to correct, within a prescribed period, any action it took that does not conform with its adopted housing element. Specifically, the corrective action must be made within 60 days after the completion of any environmental review conducted pursuant to the California Environmental Quality Act.

In addition, this bill specifies the bases on which a local agency may decide to disapprove, or conditionally approve, a proposed housing development that otherwise complies with the effective local general plan, zoning, and development policies. These disapprovals must be based on

SB 2011 (Am. 5/19/82
161-999 (008))

LEGISLATIVE SERVICE

SB 2011--contd

either the standards that applied when the development was proposed or on findings by the local agency that the development would have an adverse impact on public health or safety.

Fiscal Effect

Mandated Local Program. To the extent that local jurisdictions may be required to respond in a different manner to court proceedings or orders relating to housing elements, there could be some additional administrative costs.

If a proposed housing development that was originally disapproved must now be approved as a result of this measure, the locality would experience increased costs for public services. However, these increased costs could be offset by service fees and assessments that local agencies are authorized to impose.

The bill makes no appropriation to reimburse any increased local costs but permits local agencies to seek alternate means of reimbursement.

EXHIBIT 3 to RJN

EXHIBIT 3 to RJN

CONCURRENCE IN SENATE AMENDMENTS

AB 325 (Alejo)

As Amended September 6, 2013

Majority vote

ASSEMBLY: 41-30 (May 31, 2013) SENATE: 35-1 (September 10, 2013)

Original Committee Reference: H. & C.D.

SUMMARY: Revises the time limits for a party to initiate a challenge to certain city or county actions, including the adoption or amendment of a housing element, if the challenge is brought "in support of or to encourage or facilitate the development of housing that would increase the community's supply of [affordable] housing."

The Senate amendments:

- 1) Reduce from three years to two years the amount of time a challenging party has to serve a deficiency notice to a city or county for a challenge in support of affordable housing to the adoption or revision of a housing element that the Department of Housing and Community Development (HCD) has not found substantially complies with the requirements of the law.
- 2) Provide that an entity initiating a challenge in support of affordable housing to a city or county action related to the Least Cost Zoning Law, annual limits on housing permits, or the adoption or revision of a density bonus ordinance has six months after the city's or county's action to serve a deficiency notice, the city or county has 60 days to respond, and the challenging party has six months after the city's or county's response to file an action in court.
- 3) Make technical and conforming changes.

AS PASSED BY THE ASSEMBLY, this bill:

- 1) Stated the intent of the Legislature to modify the court's opinion in *Urban Habitat Program v. City of Pleasanton* (2008) 164 Cal.App.4th 1561, with respect to the interpretation of Government Code Section 65009.
- 2) Provided that an entity initiating a challenge in support of affordable housing to certain city or county actions may serve a deficiency notice as follows:
 - a) For a challenge to the adoption or revision of a housing element that HCD has found to substantially comply with the requirements of Housing Element Law, the deficiency notice may be served up to 270 days after the city's or county's action to revise or adopt.
 - b) For a challenge to the adoption or revision of a housing element that HCD has not found to substantially comply with the requirements of Housing Element Law, a city or county action related to the Least Cost Zoning Law, annual limits on housing permits, or the adoption or revision of a density bonus ordinance, the deficiency notice may be served up to three years after the city's or county's action.

- 3) Provided that after 60 days or the date on which the city or county takes final action in response to the deficiency notice, whichever occurs first, the challenging party has the following time limits for filing an action in court:
 - a) For a challenge to a housing element that HCD has found to substantially comply with the requirements of the law, six months.
 - b) For all other challenges, one year.
- 4) Removed from the current list of city or county actions that a party may challenge pursuant to the notice and accrual provision described above those actions related to the Housing Accountability Act, the Subdivision Map Act, and the application of a Density Bonus ordinance to a particular project, all of which are project-specific actions.
- 5) Clarified that in any action brought pursuant to the notice and accrual provisions described above, no legal remedy or injunction shall abrogate, impair, or otherwise interfere with the full exercise of the rights and protections granted to an applicant for a tentative map or a vesting tentative map under specified provisions of the Subdivision Map Act or to a developer under a specified provision relating to development agreements.
- 6) Provided that a housing element from a prior planning period may not be challenged if the city or county has adopted housing element for the new planning period.
- 7) Provided that if a third party challenges the adequacy of a housing element in court and the court finds that the housing element substantially complies with all of the requirements of housing element law, the element shall be deemed to be in compliance for purposes of state housing grant programs.

FISCAL EFFECT: None

COMMENTS: Current law provides 90 days to challenge a variety of local government actions, including the adoption or amendment of a general plan or specific plan, the adoption or amendment of a zoning ordinance, the adoption or amendment of any regulation attached to a specific plan, the adoption or amendment of a development agreement, and decisions related to applications for conditional use permits and zoning variances. This 90-day limit is set forth in Government Code Section 65009(c), which also specifies that the 90 days applies "except as provided in subdivision (d)."

Subdivision (d) relates to certain actions that are brought "in support of or to encourage or facilitate the development of housing that would increase the community's supply of [affordable] housing." Those actions include the adoption or amendment of a housing element. Under subdivision (d), the challenging party is required first to serve the city or county with a notice identifying the deficiencies in the housing element. After 60 days or the date on which the city or county took final action in response to the notice, whichever occurred first, the challenging party has one year to file the action in court. This process and statute of limitations is known as the "notice and accrual provision" and also applies to challenges in support of affordable housing to actions related to the Housing Accountability Act, local limits on housing production, Density Bonus Law, the Least Cost Zoning Law, and the statutory requirement that a city or county,

when determining whether to approve a tentative subdivision map, apply only those ordinances, policies, and standards in effect as of the date the developer's application is deemed complete.

Subdivision (d) is silent on when the deficiency notice must be filed, and the prevailing interpretation prior to a 2008 court decision was that the lack of a specified timeframe meant that a party could challenge the adequacy of a city's or county's housing element at any time during the housing element planning period. At the time, the housing element planning period was five years for all jurisdictions. Now it is eight years for cities and counties located within the territory of a metropolitan planning organization (MPO), and five years for cities and counties in rural non-MPO regions.

In 2006, Urban Habitat Program brought suit to challenge the City of Pleasanton's housing policies, including the city's annual cap on housing permits and the city's cap on the aggregate number of permissible housing units, both of which Urban Habitat claimed were insufficient to allow the city to meet its Regional Housing Needs Assessment (RHNA) obligation. In 2008, the First District California Court of Appeals issued an unpublished decision in the case of *Urban Habitat Program v. City of Pleasanton*, allowing the case to proceed with respect to some causes of action but ruling that the challenge to the housing element itself was time-barred. The court stated:

Although the statute does not specify the time within which [a deficiency] notice must be given, it is our conclusion that the statute must be interpreted as containing a time limit within which this requirement must be met... In sum, a party bringing a challenge governed by section 65009, subdivision (d), has 90 days from the date a legislative action is taken or approval is given to notify the local land use authority of any claimed deficiencies in such an action or approval. Its claim then accrues 60 days after it gives this notice.

In other words, instead of being able to initiate a challenge to a housing element at any time during the planning period, housing advocates and other interested parties now only may initiate such a challenge by submitting a deficiency notice within 90 days of the housing element's adoption.

The statutory language interpreted by the court and at issue in this bill was added to statute by AB 998 (Waters), Chapter 1138, Statutes of 1983, a bill sponsored by the League of California Cities and the California Building Industry Association. AB 998 created both the 90-day statute of limitations for most land use decisions and the specific exception related to challenges to housing elements and other specific actions if the challenge was brought in support of affordable housing. In the 25 years between the passage of AB 998 and the *Urban Habitat* ruling, housing advocates filed and successfully settled at least 11 cases in which the 60-day deficiency notice was sent more than 90 days after adoption of the city's or county's housing element. In none of these cases was the timeliness of the suit contested. Likewise, six bills amended other portions of this statute during those intervening years, and there was never any controversy surrounding the lack of a deadline for housing advocates to serve a deficiency notice nor any attempt to change the statute in this regard.

This bill modifies the court's opinion in *Urban Habitat* and makes several other changes to Government Code Section 65009. The bill allows an entity initiating a challenge in support of affordable housing to the adoption or revision of a housing element that HCD has found

substantially complies with the requirements of Housing Element Law to file a deficiency notice any time within nine months after the adoption or revision. The city or county would still have 60 days to take a final action in response to the deficiency notice and the challenging party would have six months after the city or county responds to file suit in court.

For challenges in support of affordable housing to the adoption or revision of a housing element that HCD has not found substantially complies with the requirements of the law, the bill allows the challenging party to serve a deficiency notice up to two years after the city's or county's action. Cities and counties would still have 60 days to respond to the notice and the challenging party would have one year after the city's or county's response to the notice to file suit.

For local actions related to the Least Cost Zoning Law, annual limits on housing permits, or the adoption or revision of a density bonus ordinance, the bill allows the challenging party to serve a deficiency notice up to six months after the city's or county's action. Cities and counties would still have 60 days to respond to the notice and the challenging party would have six months after the city's or county's response to file suit.

Analysis Prepared by: Anya Lawler / H. & C.D. / (916) 319-2085

FN: 0002712

EXHIBIT 4 to RJN

EXHIBIT 1 to RJN

Actions

[Home](#)
[Complaints/Parties](#)
[Actions](#)
[Minutes](#)
[Pending Hearings](#)
[Case Report](#)
[Images](#)

Open Quick Search

Case CIVMSN15-2077 - TRAUSS VS. CITY OF LAFAYETTE

Move To This Date

Viewed	Date	Action Text	Disposition	Image
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 18 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 17 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 16 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 15 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 14 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 13 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 12 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 11 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 10 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 9 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 8 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 7 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 6 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 5 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTIVE RECORD VOLUME 4 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 3 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 2 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	ADMINISTRATIVE RECORD VOLUME 1 RECEIVED FROM CITY OF LAFAYETTE	Not Applicable	N/A

	01/21/2016	NOTICE OF/TO LODGING ADMINISTRATIVE RECORD FILED BY CITY OF LAFAYETTE	Not Applicable	N/A
	01/21/2016	NOTICE OF CONTINUED HRG ON DEMURRER BY REAL PARTY IN INTEREST OBRIEN LAND CO LLC; ANNA M DETTER AS	Not Applicable	N/A
	01/11/2016	AMENDED PROOF OF SERVICE RE DEMURRER BY REAL PARTI ES IN INTEREST TO AMENDED PTN TO WRIT OF	Not Applicable	N/A
	01/11/2016	NOTICE OF ERRATA RE MPA ISO DEMURRER OF REAL PARTI ES IN INTEREST TO AMENDED PTN FOR WRIT OF ADM	Not Applicable	N/A
	01/11/2016	PROOF OF SERVICE BY MAIL FILED RE: DEMURRER TO AMENDED PTN FOR WRIT OF ADMINISTRATIVE RECORD, MPA, REQ FOR JUD NTC ON 1-8-16 SEE SVC L	Not Applicable	N/A
	01/08/2016	SPECIAL SET HEARING WAS SET FOR 2/03/16 AT 9:00 IN DEPT. 09		
	01/08/2016	NOTICE AND JOINDER BY CITY OF LAFAYETTE IN MOTION TO/FOR DEMURRER TO AMENDED PETITION FOR WRIT OF MANDAMUS FILED	Not Applicable	N/A
	01/08/2016	REQUEST OF O'BRIEN LAND COMPANY, LLC, ANNA MARIEDETTMER FOR JUDICIAL NOTICE FILED	Not Applicable	N/A
	01/08/2016	MEMORANDUM OF POINTS AND AUTHORITIES FILED BY O'BRIEN LAND COMPANY, LLC, ANNA MARIEDETTMER IN SUPPORT OF DEMURRER BY OBRIEN LAND & ANNA DETTMER	Not Applicable	N/A
	01/08/2016	NOTICE OF/TO DEMURRER OF FILED BY O'BRIEN LAND COMPANY, LLC, ANNA MARIEDETTMER	Not Applicable	N/A
	01/08/2016	FEE RECEIVED FOR FIRST PAPER FEE FROM ANNA MARIEDETTMER	Not Applicable	
	01/08/2016	FEE RECEIVED FOR FIRST PAPER FEE FROM O'BRIEN LAND COMPANY, LLC	Not Applicable	
	01/08/2016	HEARING ON DEMURRER WAS SET FOR 2/03/16 AT 9:00 IN DEPT. 09		
	01/08/2016	DEMURRER TO 1ST AMENDED CIVIL PETITION OF SONJA TRAUSS FILED BY CITY OF LAFAYETTE	Not Applicable	N/A
	01/06/2016	JOINT STIPULATION TO EXTEND TIME FOR RSP TO LODGE & SERVE THE ADMINSTRATIVE RECORD FILED	Not Applicable	N/A
	12/31/2015	CLERK'S TICKLER WAS SET FOR 1/22/16 AT 7:05 IN DEPT 09		
	12/29/2015	JOINT STIP & [PROPOSED] ORDER TO EXTEND TIME SENT TO DEPT 9; RETURN TO FIRST LEGAL	Not Applicable	N/A
	12/16/2015	COPIES	Not Applicable	
	12/14/2015	ORIGINAL SUMMONS ON 1ST AMENDED CIVIL PETITION OF SONJA TRAUSS FILED	Not Applicable	N/A
	12/14/2015	NEW PARTY(IES) ADDED TO THIS COMPLAINT IS/ARE: O'BRIEN LAND COMPANY, LLC, ANNA MARIEDETTMER	Not Applicable	
	12/14/2015	(U.J.) 1ST AMENDED CIVIL PETITION OF SONJA TRAUSS FILED	Not Applicable	N/A
	12/10/2015	PROOF OF SUBSTITUTED SERVICE OF CIVIL PETITION FILED 12/08/2015 OF SONJA TRAUSS RE: BUSINESS CITY OF LAFAYETTE W/MAILING ON 12/09/15 FILED	Not Applicable	N/A
	12/09/2015	COPIES	Not Applicable	
	12/08/2015	COPIES	Not Applicable	

	12/08/2015	SUMMONS ISSUED ON THE CIVIL PETITION FILED 12/08/2015 OF SONJA TRAUSS	Not Applicable	
	12/08/2015	COLOR OF FILE IS YELLOW	Not Applicable	
	12/08/2015	CASE ENTRY COMPLETE	Not Applicable	
	12/08/2015	CASE HAS BEEN ASSIGNED TO DEPT. 09		
	12/08/2015	(U.J.) PETITION TO/FOR WRIT OF ADMINISTRATIVE MANDAMUS FILED	Not Applicable	N/A

[Previous 50](#)