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Clerk of the Superior Court
By T. Automation , Deputy Clerk

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6 Attorneys for Respondents/Defendants CITY OF SAN DIEGO
and CITY OF SAN DIEGO PLANNING COMMISSION

Exempt from fees per Gov't Code § 6103
To the benefit of the City of San Diego

8 SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO

10 TORREY HOLISTICS, INC., a California
corporation; and

11 Petitioner and Plaintiff,

12 v.

13 CITY OF SAN DIEGO, a municipal
14 corporation; CITY OF SAN DIEGO
PLANNING COMMISSION; and DOES 1
15 through 10, inclusive;

16 Respondents and Defendants.

) Case No. 24CU029405C

) **DECLARATION OF LARA GATES IN**
) **SUPPORT OF OPPOSITION TO**
) **MOTION FOR PRELIMINARY**
) **INJUNCTION**

) I/C Judge: Hon. Michael T. Smyth

) Date: March 21, 2025

) Time: 9:00 a.m.

) Dept.: 67

) Complaint filed: December 19, 2024

) Trial: Not Set

18 SORRENTO VALLEY INVESTMENT
19 GROUP, a California partnership, and DAVID
20 SEYRANIAN, an individual;

21 Real Parties-in-Interest

22 I, Lara Gates, declare as follows:

23 1. I am a Deputy Director in the City of San Diego's Development Services Department. I
24 have been in this role since January 2021. My current job responsibilities include my role as the
25 Development Services Department Project Management Division Deputy Director that is
26 responsible for managing active ministerial and discretionary permits. As part of these
27
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1 responsibilities are processing and managing all cannabis outlet and cannabis production facility
2 conditional use permits for the City of San Diego.

3 2. The City only allows 36 cannabis outlets, plus two cannabis outlets due to the 2020
4 redistricting of City Council boundaries, in the city of San Diego. Any loss in operational
5 cannabis outlets would have financial consequences for the City by depriving it of revenue
6 generated by the cannabis outlets.

7 3. Any loss in operational cannabis outlets would also have a negative effect on cannabis
8 consumers by reducing the number reputable, approved cannabis outlets and the availability of
9 legal cannabis products and would potentially encourage the growth of the illegal cannabis
10 delivery market.

11
12 I declare under penalty of perjury under the laws of the State of California that the
13 foregoing is true and correct.

14 Executed this 3rd day of March, 2025, at San Diego, California.

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17 By Lara Gates
18 Lara Gates
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