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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
04/26/2022 at 04:00:00 PM
Clerk of the Superior Court
By Taylor Crandall, Deputy Clerk

*Exempt from filing fees pursuant to
Gov. Code §6103*

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA
11 COUNTY OF SAN DIEGO
12 CENTRAL DIVISION

14 **DARRYL COTTON, an individual,**
15 Plaintiff and Petitioner,
16
17 v.
18 **STATE OF CALIFORNIA, a public entity,**
ROBERT BONTA, an individual acting
19 **under color of law; and DOES 1 through**
200, inclusive,
20 Defendants and Respondents.

Case No. 37-2021-00053551-CU-WM-CTL
**DECLARATION OF ETHAN TURNER
IN SUPPORT OF DEMURRER TO
PETITION FOR WRIT OF MANDAMUS
AND COMPLAINT FOR INJUNCTIVE
RELIEF;**
**PURSUANT TO CODE OF CIVIL
PROCEDURE § 430.41**
Date:
Time:
Dept: C-64
Judge: The Honorable John S. Meyer
Trial Date:
Action Filed: December 22, 2021

24 I Ethan Turner Declare as follows:

25 1. I am an attorney duly licensed to practice law before the Courts of the State of California.
26 I am a Deputy Attorney General assigned to represent the Defendants and Respondents
27 (“Respondents”) in the above entitled matter. I have personal knowledge of the information set
28 forth herein below, all of which is true and correct of my own personal knowledge and belief, and

1 if called upon to testify, I could and would competently testify thereto.

2 2. Pursuant to Code of Civil Procedure section 430.41, I met and conferred with Plaintiff and
3 Petitioner Darryl Cotton (“Petitioner”) in this case, as follows:

4 3. I sent Petitioner an email on February 22, 2022 at 12:56 p.m, informing him of my intent
5 to file a demurrer. The correspondence also explained the statutory requirement to meet and
6 confer, and identified February 23, 2022 as the deadline for meeting that requirement.

7 4. Having received no response to my email correspondence, I called Petitioner at
8 approximately 4:04 p.m. on February 22, 2022. During this call, we discussed each of the grounds
9 for the demurrer over the course of a forty-five minute conversation.

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

12 Executed on February 28, 2022, at Rancho Cordova, California.

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15 Ethan Turner
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