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Attorneys for Respondents State of California  
9 and Attorney General Rob Bonta

*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  
13

14 **DARRYL COTTON, an individual,**

15 Plaintiff and Petitioner,

16 v.  
17

18 **STATE OF CALIFORNIA, a public entity,**  
19 **ROBERT BONTA, an individual acting**  
**under color of law; and DOES 1 through**  
20 **200, inclusive,**

21 Defendants and Respondents.  
22  
23

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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14 

15 Ethan Turner  
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**DECLARATION OF SERVICE BY E-MAIL**

Case Name: **Cotton v. State of CA, et. al.**  
Case No.: **37-2021-00053551-CU-WM-CTL**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for the transmission of electronic mail.

On February 28, 2022, I served the attached **DECLARATION OF ETHAN TURNER  
IN SUPPORT OF DEMURRER TO PETITION FOR WRIT OF MANDAMUS AND  
COMPLAINT FOR INJUNCTIVE RELIEF**

by transmitting a true copy via electronic mail, addressed as follows:

Darryl Cotton  
6176 Federal Blvd.  
San Diego, CA 92114  
**E-mail Address:** 151DarrylCotton@gmail.com

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on February 28, 2022, at Rocklin, California.

N. Clark

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Declarant



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Signature