ļ	Kevin I. Shenkman (SBN 223315) Mary R. Hughes (SBN 222662)		
2	Mary R. Hughes (SBN 222662) John L. Jones II (SBN 225411) SHENKAN & HUGHES		
3 4	28905 Wight Road Malibu, California 90265 Telephone: (310) 457-0970		
5	R. Rex Parris (SBN 96567) Robert A. Parris (SBN158720)		
6	Jonathan Douglass (SBN 289300) R. REX PARRIS LAW FIRM		
7	43364 10th Street West Lancaster, California 93534		
8	Telephone: (661) 949-2595 Facsimile: (661) 949-7524		
9	Milton C. Grimes (SBN 59437)  LAW OFFICES OF MILTON C. GRIMES  3774 West 54 <sup>th</sup> Street		
10	3774 West 54 <sup>th</sup> Street	5	
11	Los Angeles, California 90043 Telephone: (323) 295-3023		
12	Attorneys for Plaintiff		
13	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
14	COUNTY OF ORANGE		
15			
16	RICKK MONTOYA	CASE NO. 30-2015-00799522	
17	Plaintiff,	PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSIONS TO DEFENDANT	
18	v.	CITY OF GARDEN GROVE, CALIFORNIA	
19	CITY OF GARDEN GROVE, CALIFORNIA; and Does 1-100, inclusive,	CALLA GREEN	
20	Defendants.		
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	PLAINTIFF'S FIRST SET OF REQUESTS FOR A	DMISSIONS TO DEFENDANT CITY OF GARDEN	
	GROVE, C	ALIFORNIA	

1	PROPOUNDING PARTY: Plaintiff RICKK MONTOYA		
2	RESPONDING PARTY: Defendant CITY OF GARDEN GROVE, CALIFORNIA		
3	SET NO.: One		
4	Pursuant to Code of Civil Procedure Sections 2033.010 through 2033.070, Plaintiff Rickk		
5	Montoya hereby serves upon Defendant City of Garden Grove, California ("Defendant") the		
6	following Requests for Admission, each of which must be answered fully, separately, and		
7	pursuant in all respects to Code of Civil Procedure Sections 2033.210 through 2033.290.		
8			
9	REQUESTS FOR ADMISSIONS		
10	REQUEST FOR ADMISSION NO. 1:		
11	Admit that the members of the city council of Garden Grove, California are elected		
12	through an "at-large method of election" as that term is defined in California Elections Code		
13	Section 14026.		
14	REQUEST FOR ADMISSION NO. 2:		
15	Admit that the City of Garden Grove, California is a "political subdivision" as that term is		
16	defined in California Elections Code Section 14026.		
17	REQUEST FOR ADMISSION NO. 3:		
18	Admit that no current member of the city council of the City of Garden Grove, California		
19	is Latino.		
20	REQUEST FOR ADMISSION NO. 4:		
21	Admit that Latinos are a "protected class" as that term is defined in California Elections		
22	Code Section 14026.		
23	REQUEST FOR ADMISSION NO. 5:		
24	Admit that "racially polarized voting," as that term is defined in California Elections Code		
25	Section 14026, has occurred in the City of Garden Grove, California in at least one election.		
26	///		
27	///		
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## **REQUEST FOR ADMISSION NO. 6:** 1 Admit that "racially polarized voting," as that term is defined in California Elections Code 2 Section 14026, has occurred in the City of Garden Grove, California in at least one election since 3 1994. 4 5 **REQUEST FOR ADMISSION NO. 7:** Admit that "racially polarized voting," as that term is defined in California Elections Code 6 Section 14026, has occurred in the City of Garden Grove, California in at least one election for the 7 city council of the City of Garden Grove, California. 8 9 **REQUEST FOR ADMISSION NO. 8:** Admit that "racially polarized voting," as that term is defined in California Elections Code 10 Section 14026, has occurred in the City of Garden Grove, California in at least one election for the 11 city council of the City of Garden Grove, California since 1994. 12 **REQUEST FOR ADMISSION NO. 9:** 13 Admit that Latinos are "geographically compact or concentrated," as that phrase is used in 14 California Elections Code Section 14028, in the City of Garden Grove, California. 15 16 17 18 R. REX PARRIS LAW FIRM Dated: August 26, 2015 19 20 21 22 Jonathan Douglass, Esq. Attorneys for Plaintiff Rickk Montoya 23 24 25 26 27 28

## PROOF OF SERVICE 1013A(3) CCP Revised 5/1/88

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2 STATE OF CALIFORNIA, COUNTY OF LOS ANGELES 3 I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 43364 10<sup>th</sup> Street 4 West, Lancaster, California 93534. 5 On August 26, 2015, I served the foregoing document described as **PLAINTIFF'S FIRST SET OF REQUESTS FOR ADMISSIONS TO DEFENDANT CITY OF GARDEN GROVE, CALIFORNIA** by placing the \_\_x\_ original \_\_\_\_ a 6 7 true copy thereof enclosed in sealed envelopes addressed as follows: 8 \*\*\* See Attached Service List \*\*\* 9 10 I am "readily familiar" with the firm's practice of 11 [X]BY MAIL as follows: collection and processing correspondence for mailing. Under that practice it would be deposited with U. S. postal service on that same day with postage thereon fully prepaid at Lancaster, California in the ordinary course of business. I 12 am aware that on motion of the party served, service is presumed invalid if postal 13 cancellation date or postage meter date is more than one day after date of deposit 14 for mailing in affidavit. **BY PERSONAL SERVICE as follows:** 15 I delivered such envelope by hand to the addressees at 16 17 I caused the foregoing document described hereinabove to be personally delivered by hand by placing it in a sealed envelope or package addressed to the persons at the addresses listed on the attached service list and provided it to a professional messenger service whose name and business address is Team Legal, Inc., 963 18 19 West Avenue J, Lancaster, CA 93534. 20 I caused the foregoing document described hereinabove to be personally delivered by hand by placing it in a sealed envelope or package addressed to the persons at the addresses listed on the attached service list and provided it to a professional messenger service whose name and business address is First Legal Support 21 22 23 Services, 1511 West Beverly Blvd., Los Angeles, CA 90026. 24 BY FACSIMILE as follows: I served such document(s) by fax at See Service List to the fax number provided by each of the parties in this litigation at  $[\ ]$ 25 Lancaster, California. I received a confirmation sheet indicating said fax was 26 transmitted completely.

1 2 3	[]	BY FEDERAL EXPRESS/OVERNIGHT MAIL as follows: I placed such envelope in a Federal Express Mailer addressed to the above party or parties at the above address(es), with delivery fees fully pre-paid for next-business-day delivery, and delivered it to a Federal Express pick-up driver before 4:00 p.m. on the stated date.
4	[ ]	BY ELECTRONIC SERVICE as follows: Based on a court order, or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addressed listed
5		on the attached Service List.
6		Executed on August 26, 2015, at Lancaster, California.
7 8	<u>X</u>	(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.
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10		Kelly Basert
11		Reely Boisvert
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**SERVICE LIST** *Montoya v. City of Garden Grove, California, et al.* 

James H. Eggart Wooruff, Spradlin & Smart, APC 555 Anton Blvd, Suite 1200 Costa Mesa, CA 92626-7670 Telephone: (714) 558-7000 Facsimile: (714) 835-7787

Attorney for Defendant City of Garden Grove, California