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21 Attorneys for Plaintiff

22 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

23 **COUNTY OF ORANGE**

24 RICKK MONTOYA

25 Plaintiff,

26 v.

27 CITY OF GARDEN GROVE, CALIFORNIA;  
28 and Does 1-100, inclusive,

Defendants.

CASE NO. 30-2015-00799522

**PLAINTIFF'S FIRST SET OF REQUESTS  
FOR ADMISSIONS TO DEFENDANT  
CITY OF GARDEN GROVE,  
CALIFORNIA**

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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.

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1 **REQUEST FOR ADMISSION NO. 6:**

2 Admit that “racially polarized voting,” as that term is defined in California Elections Code  
3 Section 14026, has occurred in the City of Garden Grove, California in at least one election since  
4 1994.

5 **REQUEST FOR ADMISSION NO. 7:**

6 Admit that “racially polarized voting,” as that term is defined in California Elections Code  
7 Section 14026, has occurred in the City of Garden Grove, California in at least one election for the  
8 city council of the City of Garden Grove, California.

9 **REQUEST FOR ADMISSION NO. 8:**


10 Admit that “racially polarized voting,” as that term is defined in California Elections Code  
11 Section 14026, has occurred in the City of Garden Grove, California in at least one election for the  
12 city council of the City of Garden Grove, California since 1994.

13 **REQUEST FOR ADMISSION NO. 9:**

14 Admit that Latinos are “geographically compact or concentrated,” as that phrase is used in  
15 California Elections Code Section 14028, in the City of Garden Grove, California.

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18  
19 Dated: August 26, 2015

**R. REX PARRIS LAW FIRM**

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Jonathan Douglass, Esq.  
Attorneys for Plaintiff Rickk Montoya

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**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.

**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 address listed on the attached Service List.

Executed on August 26, 2015, at Lancaster, California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

  
Keely Boisvert

**SERVICE LIST**

*Montoya v. City of Garden Grove, California, et al.*

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