

SUMMONS (CITACION JUDICIAL)

NOTICE TO DEFENDANT: (AVISO AL DEMANDADO):

City of Palm Desert, California; and Does 1-100, inclusive

YOU ARE BEING SUED BY PLAINTIFF: (LO ESTÁ DEMANDANDO EL DEMANDANTE):

Lorraine Salas and Karina Quintanilla

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

JUN 05 2019

M. Martinez
Deputy

By *M. Martinez*

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.**

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es): Riverside Superior Court
3255 E Tahquitz Canyon Way
Palm Springs, CA 92262

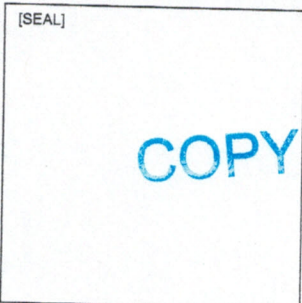
CASE NUMBER:
(Número de Caso): **PSC 1903800**

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:
(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):
Morris Baller, 300 Lakeside Dr., Suite 1000, Oakland, CA 94612, (510) 763-9800

DATE: June 5, 2019
(Fecha)

Clerk, by M. MARTINEZ, Deputy
(Secretario) (Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)
(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).



NOTICE TO THE PERSON SERVED: You are served

- as an individual defendant.
- as the person sued under the fictitious name of (specify):
- on behalf of (specify): City of Palm Desert, California
under: CCP 416.10 (corporation) CCP 416.60 (minor)
 CCP 416.20 (defunct corporation) CCP 416.70 (conservatee)
 CCP 416.40 (association or partnership) CCP 416.90 (authorized person)
 other (specify): CCP 416.50 (public agency)
- by personal delivery on (date):

1 Morris Baller (SBN 48928)
2 Laura Ho (SBN 173179)
3 Anne Bellows (SBN 293722)
4 **GOLDSTEIN BORGEN DARDARIAN & HO LLP**
5 300 Lakeside Dr
6 Suite 1000
7 Oakland, CA 94612-3536
8 Telephone: (510) 763-9800

9 Kevin I. Shenkman (SBN 223315)
10 Mary R. Hughes (SBN 222622)
11 Andrea A. Alarcon (SBN 319536)
12 **SHENKMAN & HUGHES PC**
13 28905 Wight Road
14 Malibu, California 90265
15 Telephone: (310) 457-0970

16 Attorneys for Plaintiff

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

JUN 05 2019

By *M. Martinez*
M. Martinez
Deputy

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF RIVERSIDE**

14 LORRAINE SALAS and KARINA
15 QUINTANILLA

16 Plaintiffs,

17 v.

18 CITY OF PALM DESERT,
19 CALIFORNIA; and DOES 1-100,
20 inclusive,

21 Defendants.

Case No.: **PSC 1903800**

**COMPLAINT FOR VIOLATION OF THE
CALIFORNIA VOTING RIGHTS ACT OF
2001**

1 **COMES NOW** Plaintiffs Lorraine Salas and Karina Quintanilla (collectively
2 “Plaintiffs”), and allege as follows:

3 **NATURE OF THE ACTION**

4 1. This action is brought by Plaintiffs for injunctive and declaratory relief against
5 the City of Palm Desert, California, for its violation of the California Voting Rights Act of
6 2001 (hereinafter the "CVRA"), Cal. Elec. Code §§ 14025, et seq. The imposition of at-large
7 elections by the City of Palm Desert has resulted in vote dilution for the Latino residents and
8 has denied them effective political participation in elections to the five-member Palm Desert
9 City Council. The City of Palm Desert's at-large method of election for electing members to
10 its City Council prevents Latino residents from electing candidates of their choice or
11 influencing the outcome of Palm Desert's City Council elections.

12 2. The effects of the City of Palm Desert's at-large method of election are apparent
13 and compelling. Despite a Latino population of 25.8% in the City of Palm Desert in 2015
14 (and likely higher today), Latinos and ballot choices preferred by the Latino electorate have
15 consistently been defeated in Palm Desert. Rather, in Palm Desert's recent elections –
16 including the most recent election in 2018 – Latino candidates and ballot choices, preferred
17 by the Latino electorate, were all defeated by the bloc voting of the non-Latino electorate.
18 All of this reveals a lack of access for Latinos to the political process.

19 3. Palm Desert's at-large method of election violates the CVRA. Plaintiffs bring
20 this action to enjoin the City of Palm Desert's continued abridgment of Latino voting rights.
21 Plaintiffs seek a declaration from this Court that the City of Palm Desert's at-large elections,
22 for all or any portion of its city council, violates the CVRA. Plaintiffs seek injunctive relief
23 enjoining the City of Palm Desert from further imposing or applying an at-large method of
24 election. Further, Plaintiffs seek injunctive relief requiring the City of Palm Desert to
25 implement district-based elections or other alternative relief tailored to remedy Palm Desert's
26 violation of the CVRA. Moreover, Plaintiff and, more generally, the voters residing in Palm
27 Desert are entitled to the prompt implementation of district-based elections employing
28 districts tailored to remedy the years of dilution of the Latino vote in Palm Desert.

1 10. Plaintiffs are informed and believe and thereon allege that at all times herein
2 mentioned each of the Defendants were the agent, partner, predecessor in interest, successor
3 in interest, and/or employee of one or more of the other Defendants, and were at all times
4 herein mentioned acting with the course and scope of such agency and/or employment.
5

6 **JURISDICTION AND VENUE**

7 11. All parties hereto are within the unlimited jurisdiction of this Court. The
8 unlawful acts complained of occurred in Riverside County. Venue in this Court is proper.
9

9 **FACTS**

10 12. The City of Palm Desert contains approximately 52,932 persons, of which
11 approximately 25.8% are Hispanic or Latino, based upon recent data from the United States
12 Census.
13

13 13. The City of Palm Desert is governed by a city council. The Palm Desert City
14 Council serves as the governmental body responsible for the operations of the City of Palm
15 Desert. The City Council is comprised of five members.
16

16 14. The Palm Desert City Council members are elected pursuant to an "at-large
17 method of election," as that term is defined by Section 14026 of the Election Code. In all
18 past elections, all of the eligible voters of the entire City of Palm Desert have elected all of
19 the members of the City Council.
20

20 15. Vacancies to the City Council are elected on a staggered basis; as a result, every
21 two years the city electorate elects two or three City Council members.
22

22 16. Elections conducted within the City of Palm Desert are characterized by
23 racially polarized voting. Racially polarized voting occurs when members of a protected
24 class as defined by the CVRA, Cal. Elec. Coed § 14025(d), vote for candidates and electoral
25 choices that are different from the rest of the electorate. Racially polarized voting exists
26 within the City of Palm Desert because there is a difference between the choice of candidates
27 or other electoral choices that are preferred by Latino voters, and the choice of candidates or
28

1 other electoral choices that are preferred by voters in the rest of the electorate, with the result
2 being that Latino-preferred candidates usually lose.

3 17. Racially polarized voting is legally significant in Palm Desert's City Council
4 elections because it dilutes the opportunity of Latino voters to elect candidates of their choice
5 or influence the outcome of those elections.

6 18. Patterns of racially polarized voting have the effect of impeding opportunities
7 for Latino voters to elect candidates of their choice to the at-large city council positions in the
8 City of Palm Desert or influence the outcome of those elections, where the non-Latino
9 electorate dominates elections. For several years, Latino voters have been harmed by racially
10 polarized voting.

11 19. The at-large method of election and repeated racially polarized voting has
12 caused Latino vote dilution within the City of Palm Desert. Where Latinos and the rest of the
13 electorate express different preferences on candidates and other electoral choices, non-
14 Latinos by virtue of their overall numerical majority among voters, defeat the preferences of
15 Latino voters.

16 20. The obstacles posed by at-large elections in the City of Palm Desert, together
17 with racially polarized voting, impair the ability of people of certain races, color or language
18 minority groups, such as Latino voters, to elect candidates of their choice or to influence the
19 outcome of elections conducted in the City of Palm Desert.

20 21. An alternative method of election, such as district-based elections, exists that
21 will provide an opportunity for the members of the protected classes as defined by the CVRA
22 to elect candidates of their choice or to influence the outcome of the Palm Desert City
23 Council elections.

24 **FIRST CAUSE OF ACTION**

25 **(Violation of California Voting Rights Act of 2001)**

26 **(Against All Defendants)**

27 22. Plaintiff incorporates by this reference paragraphs 1 through 21 as though fully
28 set forth herein.

1 23. Defendant City of Palm Desert is a political subdivision within the State of
2 California. Defendant is a general law city.

3 24. Defendant City of Palm Desert has employed an at-large method of election,
4 where voters of its entire jurisdiction elect all five members to its City Council.

5 25. Racially polarized voting has occurred, and continues to occur, in elections for
6 members of the City Council for the City of Palm Desert and in elections incorporating other
7 electoral choices by voters of the City of Palm Desert, California. Absent remedial measures
8 ordered by this Court, racially polarized voting will continue to plague elections held in Palm
9 Desert. As a result, the City of Palm Desert's at-large method of election is imposed in a
10 manner that impairs the ability of protected classes as defined by the CVRA to elect
11 candidates of their choice or influence the outcome of elections.

12 26. An alternative method of election, such as district-based elections, exists that
13 will provide an opportunity for the members of a protected class as defined by the CVRA to
14 elect candidates of their choice or to influence the outcome of the Palm Desert City Council
15 elections.

16 27. An actual controversy has arisen and now exists between the parties relating to
17 the legal rights and duties of Plaintiffs and Defendants, for which Plaintiffs desire a
18 declaration of rights.

19 28. Defendants' wrongful conduct has caused and, unless enjoined by this Court,
20 will continue to cause, immediate and irreparable injury to Plaintiff, and all residents of the
21 City of Palm Desert.

22 29. Plaintiffs and the residents of the City of Palm Desert have no adequate remedy
23 at law for the injuries they currently suffer and will otherwise continue to suffer.

24 **PRAYER FOR RELIEF**

25 WHEREFORE, Plaintiff pray for judgment against Defendants, and each of them, as
26 follows:

27 1. For a decree that the City of Palm Desert's at-large method of election for all or
28 any portion of the City Council violates the California Voting Rights Act of 2001;

1 2. For preliminary and permanent injunctive relief enjoining the City of Palm
2 Desert from imposing or applying an at-large method of election;

3 3. For injunctive relief mandating the City of Palm Desert to implement district-
4 based elections, as defined by the California Voting Rights Act of 2001, employing a district
5 map tailored to remedy Defendant's violation of the California Voting Rights Act of 2001;

6 4. For injunctive relief mandating the prompt election of all city council members
7 through district-based elections, or another election method tailored to remedy Defendant's
8 violation of the California Voting Rights Act of 2001,

9 5. For injunctive relief prohibiting anyone who has not been lawfully elected,
10 through an election that complies with the California Voting Rights Act of 2001, from acting
11 as a member of the Palm Desert City Council;

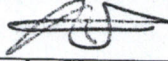
12 6. Other relief tailored to remedy the City of Palm Desert's violation of the
13 California Voting Rights Act of 2001;

14 7. For an award of Plaintiff attorneys' fees, costs, litigation expenses and
15 prejudgment interest pursuant to Elec. Code § 14030 and other applicable law; and

16 8. For such further relief as the Court deems just and proper.

17
18 DATED: June 4, 2019

Respectfully submitted:
GOLDSTEIN BORGEN DARDARIAN & HO LLP
SHENKMAN & HUGHES PC,

19 By: 
20 _____
Kevin Shenkman
21 Attorneys for Plaintiff
22
23
24
25
26
27
28

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):
Kevin Shenkman (SBN 223315)
Shenkman & Hughes PC
28905 Wight Rd.
Malibu, CA 90265
TELEPHONE NO.: 310-457-0970 FAX NO.:
ATTORNEY FOR (Name): Plaintiffs Lorraine Salas and Karina Quintanilla

FOR COURT USE ONLY

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF RIVERSIDE

JUN 05 2019

M. Martinez
Deputy

By *M. Martinez*

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Riverside
STREET ADDRESS: 3255 E Tahquitz Canyon Way
MAILING ADDRESS: 3255 E Tahquitz Canyon Way
CITY AND ZIP CODE: Palm Springs, CA 92262
BRANCH NAME: Palm Springs Courthouse

CASE NAME:
Salas, et al. v. City of Palm Desert, California, et al.

CASE NUMBER:
PSC 1903800

JUDGE:
DEPT:

CIVIL CASE COVER SHEET
 Unlimited (Amount demanded exceeds \$25,000) **Limited** (Amount demanded is \$25,000 or less)
Complex Case Designation
 Counter **Joinder**
Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400-3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)
Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input type="checkbox"/> Other PI/PD/WD (23)	Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26)	Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20)
Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input checked="" type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35)	Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38)	Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (not specified above) (42)
Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (not specified above) (43)

2. This case is is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:
- a. Large number of separately represented parties
 - b. Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve
 - c. Substantial amount of documentary evidence
 - d. Large number of witnesses
 - e. Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court
 - f. Substantial postjudgment judicial supervision
3. Remedies sought (check all that apply): a. monetary b. nonmonetary; declaratory or injunctive relief c. punitive
4. Number of causes of action (specify): One - Violation of the California Voting Rights Act
5. This case is is not a class action suit.
6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: June 4, 2019
Kevin Shenkman
(TYPE OR PRINT NAME)

[Signature]
(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

- Auto (22)—Personal Injury/Property Damage/Wrongful Death
- Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

- Asbestos (04)
 - Asbestos Property Damage
 - Asbestos Personal Injury/Wrongful Death
- Product Liability (*not asbestos or toxic/environmental*) (24)
- Medical Malpractice (45)
 - Medical Malpractice—Physicians & Surgeons
 - Other Professional Health Care Malpractice
- Other PI/PD/WD (23)
 - Premises Liability (e.g., slip and fall)
 - Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
 - Intentional Infliction of Emotional Distress
 - Negligent Infliction of Emotional Distress

Non-PI/PD/WD (Other) Tort

- Business Tort/Unfair Business Practice (07)
- Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
- Defamation (e.g., slander, libel) (13)
- Fraud (16)
- Intellectual Property (19)
- Professional Negligence (25)
 - Legal Malpractice
 - Other Professional Malpractice (*not medical or legal*)
- Other Non-PI/PD/WD Tort (35)

Employment

- Wrongful Termination (36)
- Other Employment (15)

Contract

- Breach of Contract/Warranty (06)
- Breach of Rental/Lease
- Contract (*not unlawful detainer or wrongful eviction*)
- Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
- Negligent Breach of Contract/Warranty
- Other Breach of Contract/Warranty
- Collections (e.g., money owed, open book accounts) (09)
- Collection Case—Seller Plaintiff
- Other Promissory Note/Collections Case
- Insurance Coverage (*not provisionally complex*) (18)
 - Auto Subrogation
 - Other Coverage
- Other Contract (37)
 - Contractual Fraud
 - Other Contract Dispute

Real Property

- Eminent Domain/Inverse Condemnation (14)
- Wrongful Eviction (33)
- Other Real Property (e.g., quiet title) (26)
 - Writ of Possession of Real Property
 - Mortgage Foreclosure
 - Quiet Title
 - Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

- Commercial (31)
- Residential (32)
- Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

- Asset Forfeiture (05)
- Petition Re: Arbitration Award (11)
- Writ of Mandate (02)
 - Writ—Administrative Mandamus
 - Writ—Mandamus on Limited Court Case Matter
- Writ—Other Limited Court Case Review
- Other Judicial Review (39)
 - Review of Health Officer Order
 - Notice of Appeal—Labor Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

- Antitrust/Trade Regulation (03)
- Construction Defect (10)
- Claims Involving Mass Tort (40)
- Securities Litigation (28)
- Environmental/Toxic Tort (30)
- Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

- Enforcement of Judgment (20)
 - Abstract of Judgment (Out of County)
 - Confession of Judgment (*non-domestic relations*)
 - Sister State Judgment
 - Administrative Agency Award (*not unpaid taxes*)
 - Petition/Certification of Entry of Judgment on Unpaid Taxes
 - Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

- RICO (27)
- Other Complaint (*not specified above*) (42)
 - Declaratory Relief Only
 - Injunctive Relief Only (*non-harassment*)
 - Mechanics Lien
 - Other Commercial Complaint Case (*non-tort/non-complex*)
 - Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

- Partnership and Corporate Governance (21)
- Other Petition (*not specified above*) (43)
 - Civil Harassment
 - Workplace Violence
 - Elder/Dependent Adult Abuse
 - Election Contest
 - Petition for Name Change
 - Petition for Relief From Late Claim
 - Other Civil Petition

SUPERIOR COURT OF CALIFORNIA, COUNTY OF RIVERSIDE

- BANNING 311 E. Ramsey St., Banning, CA 92220
- BLYTHE 265 N. Broadway, Blythe, CA 92225
- HEMET 880 N. State St., Hemet, CA 92543
- MORENO VALLEY 13800 Heacock St., Ste. D201, Moreno Valley, CA 92553

- MURRIETA 30755-D Auld Rd., Suite 1226, Murrieta, CA 92563
- PALM SPRINGS 3255 E. Tahquitz Canyon Way, Palm Springs, CA 92262
- RIVERSIDE 4050 Main St., Riverside, CA 92501
- TEMECULA 41002 County Center Dr., #100, Temecula, CA 92591

RI-030

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar Number and Address) Kevin Shenkman (SBN 223315) Shenkman & Hughes PC 28905 Wight Rd. Malibu, CA 90265 TELEPHONE NO: 310-457-0970 FAX NO. (Optional): E-MAIL ADDRESS (Optional): kishenkman@shenkmanhughes.com ATTORNEY FOR (Name): Plaintiffs Lorraine Salas and Karina Quintanilla	FOR COURT USE ONLY FILED SUPERIOR COURT OF CALIFORNIA COUNTY OF RIVERSIDE JUN 05 2019 <i>M. Martinez</i> M. Martinez Deputy CASE NUMBER: PSC 1903800
PLAINTIFF/PETITIONER: Salas, et al.	
DEFENDANT/RESPONDENT: City of Palm Desert, California, et al.	
CERTIFICATE OF COUNSEL	

The undersigned certifies that this matter should be tried or heard in the court identified above for the reasons specified below:


- The action arose in the zip code of: 92260
- The action concerns real property located in the zip code of: _____
- The Defendant resides in the zip code of: 92260

For more information on where actions should be filed in the Riverside County Superior Courts, please refer to Local Rule 1.0015 at www.riverside.courts.ca.gov.

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

Date June 4, 2019

Kevin Shenkman
(TYPE OR PRINT NAME OF ATTORNEY PARTY MAKING DECLARATION)



(SIGNATURE)