

1 Thomas W. Casparian, Esq. (Bar No. 169763)
tcasparian@cozen.com
2 COZEN O'CONNOR
401 Wilshire Boulevard, Suite 850
3 Santa Monica, California 90401
Telephone: (310) 393-4000
4 Facsimile: (310) 394-4700

5 Attorneys for Petitioner and Plaintiff
Carter-Spencer Enterprises, LLC
6
7

8 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF LOS ANGELES**
10

11 CARTER-SPENCER ENTERPRISES, LLC,

12 Petitioner and Plaintiff,

13 vs.

14 CITY OF CARSON; CITY OF CARSON CITY
COUNCIL; DOES 1 through 10, inclusive,

15 Respondents and Defendants,

16 SOCORRO MAGAÑA,

17 Intervenor.
18

Case No.: 21STCP02987

[Consolidated with Case No.: 21STCP03033]

**~~PROPOSED~~ PEREMPTORY WRIT OF
MANDAMUS**

Dept. 86

Complaint Filed: September 10, 2021

19
20 The People of the State of California

21 To: City of Carson; City of Carson City Council, Respondents:

22 WHEREAS ON December 7, 2022, judgment having been entered in this action, ordering
23 that a peremptory writ of mandamus be issued from this court,
24

25 YOU ARE HEREBY COMMANDED immediately on receipt of this writ to set aside City
26 of Carson Resolutions Nos. 21-2708 and 21-070, ~~granting the application before the City of~~
27 ~~Carson to close the Rancho Dominguez Mobile Estates, located at 435 East Gardena Boulevard,~~
28 ~~Carson, CA (the "Mobilehome Park") and finding that petitioner Carter-Spencer Enterprises, LLC~~

1 ~~("Carter-Spencer") is the "responsible party" for closure under Government Code § 65863.7,~~
2 ~~which proceedings are hereby remanded to the City of Carson City Council to reconsider your~~
3 ~~action in light of this court's statement of decision finding that the City of Carson is the~~
4 ~~"responsible party" for closure under Government Code § 65863.7, and to take any further action~~
5 ~~specially enjoined on you by law; nothing in this writ shall limit or control the discretion legally~~
6 ~~vested in you.~~

7 The administrative record may be remanded to the agency and returned to the court with
8 the Return to Peremptory Writ of Mandamus.

9 YOU ARE FURTHER COMMANDED to make and file a return to this writ on or before
10 ~~January 31, 2023~~, setting forth what you have done to comply.

11 **3-30-2023**

12 [SEAL]



13
14
15 **FEB 17 2023**

David W. Slayton

Clerk

By:

Deputy Clerk

T. Heath

PROOF OF SERVICE

STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

I, Thomas W. Casparian, declare that I am employed at Cozen O'Connor, whose address is 401 Wilshire Boulevard, Suite 850, Santa Monica, CA 90401; arobinson@cozen.com. I am over the age of eighteen (18) years and am not a party to this action. On December 6, 2022, by the method noted below, I served the following document(s):

PETITIONER/PLAINTIFF CARTER-SPENCER ENTERPRISES, LLC'S LODGMENT OF [PROPOSED] WRIT OF MANDAMUS

on the interested parties in this action as follows:

Stephen R. Onstot Michelle L. Villarreal ALESIRE & WYNDER, LLP 3880 Lemon Street, Suite 520 Riverside, California 92501 Telephone: (951) 241-7338 Facsimile: (951) 300-0985 Email: sonstot@awattorneys.com Email: mvillarreal@awattorneys.com	Attorneys for Respondents and Defendants CITY OF CARSON; CITY OF CARSON CITY COUNCIL
Michael Novasky Ana Zuniga Dehsong Matheu Fred Nakamura David Pallack NEIGHBORHOOD LEGAL SERVICES OF LOS ANGELES COUNTY 3629 Santa Anita Avenue, #109 El Monte, CA 91731 Telephone: (818) 492-5254 Facsimile: (833) 537-5529 Email: anazuniga@nlsia.org Email: dehsongmatheu@nlsia.org Email: fnakamura@nlsia.org Email: dpallack@nlsia.org Email: michaelnovasky@nlsia.org	Attorneys for Intervenor SOCORRO MAGAÑA
Craig Castellane Melissa A. Morris PUBLIC INTEREST LAW PROJECT 449 15 th Street, Suite 301 Oakland, CA 94612 Telephone: (510) 891-9794 Facsimile: (510) 891-9727 Email: ccastellane@pilpca.org Email: mmorris@pilpca.org	Attorneys for Intervenor SOCORRO MAGAÑA

--	--

BY MAIL: By placing a copy of the document(s) in a sealed envelope or package addressed to the person(s) at the address(es) listed above. I am readily familiar with the business practice of my place of employment in respect to the collection and processing of correspondence, pleadings and notices for mailing with United States Postal Service. The foregoing sealed envelope was placed for collection and mailing this date consistent with the ordinary business practice of my place of employment, so that it will be picked up this date with postage thereon fully prepaid at Santa Monica, California, in the ordinary course of such business.

BY ELECTRONIC MAIL: By sending a portable document format (pdf) copy of the document(s) to email address: sonstot@awattorneys.com; mvillarreal@awattorneys.com; anazuniga@nlsia.org; dehsongmatheu@nlsia.org; fnakamura@nlsia.org; dpallack@nlsia.org; michaelnovasky@nlsia.org; ccastellanet@pilpca.org; mmorris@pilpca.org. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☒ [State] I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on December 6, 2022, at Santa Monica, California.

/s/ Thomas W. Casparian

Thomas W. Casparian