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7 *Attorneys for Respondent Dr. Shirley N. Weber in
her official capacity as Secretary of State of the
8 State of California*

*Exempt from Filing Fees Under
Government Code Section §6103*

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 COUNTY OF SACRAMENTO

12 **DEAN C. LOGAN, in his official capacity as**
13 **Los Angeles County Registrar-**
Recorder/County Clerk, CYNTHIA L.
14 **PAES, in her official capacity as Interim**
Registrar of Voters for the County of San
15 **Diego,**

Case No. 34-2021-80003629

**[PROPOSED] STIPULATED JUDGMENT
EXTENDING SIGNATURE
VERIFICATION DEADLINE FOR
INITIATIVES 1885 AND 1886**

16 Petitioners & Plaintiffs,

17 v.

Dept: 23
Judge: Honorable Laurie M. Earl
Action Filed: April 16, 2021

18 **DR. SHIRLEY N. WEBER, in her official**
19 **capacity as California Secretary of State,**
20 Respondent & Defendant.

1 WHEREAS on March 10, 2021, Respondent Secretary of State issued a notice ordering all
2 county elections officials to complete verification of all signatures submitted to the elections
3 officials on two statewide initiative petitions, Statewide Initiative No. 1885-Requires State
4 Regulations to Reduce Plastic Waste, Tax Producers of Single-Use Plastics, and Fund Recycling
5 and Environmental Programs (“Initiative 1885”) and Statewide Initiative No. 1886-Authorizes
6 New Types of Gambling, Initiative Constitutional and Statutory Amendment (“Initiative 1886”) (collectively, “Initiative Petitions”), and then submit certificates indicating the results of that
7 process to Respondent by April 22, 2021;

9 WHEREAS Petitioners Dean C. Logan, in his official capacity as Los Angeles County
10 Registrar-Recorder/County Clerk, and Cynthia L. Paes, in her official capacity as Interim
11 Registrar of Voters for the County of San Diego (hereinafter “Petitioners” or “Registrars”) have
12 been and still are in the process of reviewing and verifying all signatures submitted to them,
13 respectively, on both Initiative Petitions, while simultaneously conducting other election
14 activities, including signature review for the gubernatorial recall petition and preparing for and
15 conducting special elections;

16 WHEREAS, Petitioners have determined they are unable to complete simultaneous review
17 and verification of both Initiative Petitions by the April 22, 2021 deadline;

18 WHEREAS Petitioners filed a Petition for Writ of Mandate and Complaint for Declaratory
19 Relief on April 16, 2021 asking the Court to command Respondent Dr. Shirley N. Weber, in her
20 official capacity as California Secretary of State, to accept certificates from Petitioners indicating
21 the results of their signature verification process for the Initiative Petitions up through and until
22 July 19, 2021, instead of the current deadline of April 22, 2021;

23 WHEREAS Respondent Secretary of State represents that, and Petitioners are informed and
24 believe that, counties other than Petitioners have sought relief from the statutory deadline from
25 the Secretary of State, citing the same concerns outlined by Petitioners;

26 WHEREAS proponents of Initiative 1885 do not oppose an extension of time by an
27 additional sixty (60) business days, up to and until July 19, 2021, for Petitioners to complete

1 signature review and verification for Initiative 1885;

2 WHEREAS proponents of Initiative 1886 oppose an extension of sixty (60) business days
3 to complete signature review and verification for Initiative 1886, but are willing to stipulate to an
4 extension of thirty-four (34) calendar days, up to and until May 26, 2021, for Petitioners to
5 complete signature review and verification for Initiative 1886;

6 WHEREAS Los Angeles County Registrar is informed and believes it would only be able
7 to complete signature review and verification for Initiative 1886 by May 26, 2021, if it is directed
8 by the Court, pursuant to this Stipulated Judgment, to prioritize the signature review and
9 verification of Initiative 1886 ahead of Initiative 1885, and to then complete the signature review
10 and verification of Initiative 1885 by no later than July 19, 2021, and is willing to stipulate to the
11 same;

12 WHEREAS the Registrar of the County of San Diego believes the Registrar will be able to
13 complete signature review and verification for both Initiative Petitions by no later than May 26,
14 2021, and intends to do so;

15 WHEREAS for the limited purpose of entering into this Stipulated Judgment, Petitioners
16 and Respondent stipulate to including proponents for Initiative 1885, as represented by Lance
17 Olson of the law firm of Olson Remcho, and proponents for Initiative 1886, as represented by
18 Fred Woocher of the law firm of Strumwasser & Woocher, as Real Parties in Interest on this
19 Stipulated Judgment;

20 WHEREAS Respondent Secretary of State has considered the arguments within the Petition
21 and agrees that the requested relief is necessary and supports an extension to complete signature
22 review and verification for all counties statewide;

23 WHEREAS extending the deadline statewide ensures consistency and promotes judicial
24 efficiency by obviating the need for multiple similar actions;

25 WHEREAS the requested extension will not interfere with Respondent's election duties or
26 the conduct of the November 2022 election.

1 NOW, THEREFORE, THE PARTIES HEREBY STIPULATE AND AGREE TO ENTRY OF
2 JUDGMENT AS FOLLOWS:

3 1. The petition for writ of mandate shall be GRANTED.

4 2. Counties may prioritize the signature review and verification of Initiative 1886 in
5 order to complete such signature review and verification, and shall report the results of the same
6 to Respondent Secretary of State, by no later than May 26, 2021, and subsequently complete the
7 signature review and verification of Initiative 1885, and shall report the results of the same to
8 Respondent Secretary of State, by no later than July 19, 2021.

9 3. California Secretary of State, Dr. Shirley N. Weber, is required to accept certificates
10 of final verification of signatures on Initiative 1886 through and until May 26, 2021, instead of
11 the current deadline of April 22, 2021, notwithstanding Elections Code section 9031(b), and to
12 accept certificates of final verification of signatures on Initiative 1885 through and until July 19,
13 2021, instead of the current deadline of April 22, 2021, notwithstanding Elections Code section
14 9031(b).

15 IN WITNESS WHEREOF, the parties hereto have read and understand the foregoing
16 contents and execute this Stipulated Judgment as of the date the last signature is executed. All
17 counsel represent that they have authority from their clients to enter into this Stipulation on their
18 clients' behalf. This Stipulation may be signed in counterparts, and scanned signatures shall be
19 deemed sufficient and binding as if they were originals.

20
21 Dated: April 21, 2021

By: Mina Eachus
GINA EACHUS
Senior Deputy County Counsel
Counsel for Petitioner Dean C. Logan, in his
official capacity as Los Angeles County Registrar-
Recorder/County Clerk

22
23
24
25 Dated: April 20, 2021

By: _____
CHRISTINA SNIDER
Senior Deputy County Counsel
Counsel for Petitioner Cynthia L. Paes, in her
official capacity as Interim Registrar of Voters for
the County of San Diego

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28 HOA.103227252.1

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4 2. Counties may prioritize the signature review and verification of Initiative 1886 in
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6 to Respondent Secretary of State, by no later than May 26, 2021, and subsequently complete the
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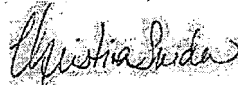
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Senior Deputy County Counsel
Counsel for Petitioner Dean C. Logan, in his
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23 Dated: April 21, 2021

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Counsel for Petitioner Cynthia L. Paes, in her
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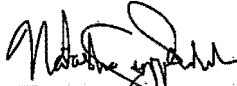
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Dated: April 21, 2021

By: 

Natasha Saggar Sheth
Deputy Attorney General
Counsel for Respondent Secretary of State

Dated: April 20, 2021

By: _____
Fredric D. Woocher
Attorneys for Real Parties in Interest Edwin
"Thorpe" Romero, Anthony Roberts, Jeff L.
Grubbe, Mark Macarro, and Coalition to
Authorize Regulated Sports Wagering
(Initiative 1886 Proponents)

Dated: April 20, 2021

By: _____
Lance H. Olson
Attorneys for Real Parties in Interest Michael
Sangiaco, Caryl Hart, Linda Escalante, and
Clean Coasts, Clean Water Clean Streets:
Environmentalists, Recyclers and Farmers
Against Plastic Pollution
(Initiative 1885 Proponents)

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Dated: April 20, 2021

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Natasha Saggar Sheth
Deputy Attorney General
Counsel for Respondent Secretary of State

Dated: April 20, 2021

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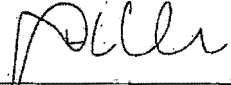
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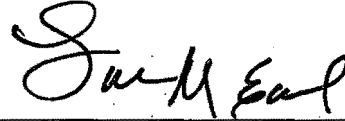
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JUDGMENT

THE STIPULATED JUDGMENT IS HEREBY ORDERED, ADJUDGED, AND
DECREED.

ALL PARTIES SHALL BEAR THEIR OWN COSTS AND FEES.

Dated: April 22, 2021



HONORABLE LAURIE M. EARL
Judge of the Superior Court of California,
County of Sacramento