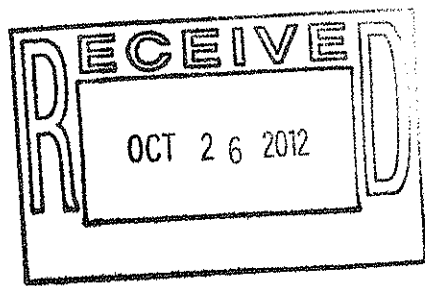


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 3 Office of County Counsel
 Office of County Counsel
 4 COUNTY OF IMPERIAL
 940 W. Main Street, Suite 205
 5 El Centro, CA 92243
 760-482-4400 telephone
 6 Fax 760-353-9347 facsimile



8 Attorneys for Defendant, Imperial County Auditor Controller [Exempt from filing fees pursuant to
 9 Govt. Code § 6103]

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **COUNTY OF SACRAMENTO**

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 14 CITY OF BELLFLOWER;
 15 SUCCESSOR AGENCY OF THE
 16 DISSOLVED REDEVELOPMENT
 17 AGENCY OF THE CITY OF
 18 BELLFLOWER; CITY OF CERRITOS;
 19 CERRITOS REDEVELOPMENT
 20 AGENCY SUCCESSOR AGENCY;
 21 CITY OF CHULA VISTA; CHULA
 22 VISTA REDEVELOPMENT AGENCY
 23 SUCCESSOR AGENCY; CITY OF EL
 24 CENTRO; EL CENTRO
 25 REDEVELOPMENT AGENCY
 26 SUCCESSOR AGENCY; CITY OF
 27 FOLSOM; FOLSOM
 28 REDEVELOPMENT AGENCY
 SUCCESSOR AGENCY; CITY OF
 GRASS VALLEY; GRASS VALLEY
 REDEVELOPMENT AGENCY
 SUCCESSOR AGENCY; CITY OF
 HUGHSON; HUGHSON
 REDEVELOPMENT AGENCY
 SUCCESSOR AGENCY; CITY OF
 LOMPOC; SUCCESSOR AGENCY TO
 THE DISSOLVED LOMPOC
 REDEVELOPMENT AGENCY; CITY
 OF OXNARD; OXNARD
 COMMUNITY DEVELOPMENT

Case No. 34-2012-80001269

GENERAL DENIAL OF RESPONDENT
 DOUGLAS NEWLAND, IN HIS OFFICIAL
 CAPACITY AS IMPERIAL COUNTY
 AUDITOR-CONTROLLER, TO COMPLAINT
 FOR DECLARATORY AND INJUNCTIVE
 RELIEF AND PETITION FOR WRIT OF
 MANDATE

Complaint filed: September 19, 2012

Assigned to Judge Frawley, Dept. 29

1 COMMISSION SUCCESSOR
2 AGENCY; CITY OF SAN GABRIEL;
3 SAN GABRIEL REDEVELOPMENT
4 AGENCY SUCCESSOR AGENCY;
5 CITY OF SIGNAL HILL; SIGNAL
6 HILL REDEVELOPMENT AGENCY
7 SUCCESSOR AGENCY; CITY OF
8 TRUCKEE; TRUCKEE
9 SUCCESSOR AGENCY; CITY OF
10 TULARE: TULARE AND
11 REDEVELOPMENT AGENCY
12 SUCCESSOR AGENCY,

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Petitioners/Plaintiffs,

v.

ANA MATOSANTOS, in her official
capacity as California State Director of
Finance; CALIFORNIA STATE
BOARD OF EQUALIZATION;
WENDY WATANABE, in her official
capacity as Los Angeles County Auditor-
Controller; RITA WOODARD, in her
official capacity as Tulare County
Auditor-Controller; MARCIA SALTER,
in her official capacity as Nevada County
Auditor-Controller; JULIE VALVERDE
in her official capacity as Sacramento
County Auditor-Controller; DOUGLAS
NEWLAND in his official capacity as
Imperial County Auditor-Controller;
LAUREN KLEIN in her official capacity
as Stanislaus County Auditor-Controller;
TRACY SANDOVAL in her official
capacity as San Diego County Auditor-
Controller; CHRISTINE L. COHEN in
her official capacity as Ventura County
Auditor-Controller; ROBERT W. GEIS,
in his official capacity as Santa Barbara
County Auditor-Controller; and DOES 1-10,
inclusive,

Respondents/Defendants.

COMES NOW respondent and defendant, Douglas Newland in his official capacity as
Imperial County Auditor-Controller ("Newland"), and in answer to the unverified complaint and
petition for writ of mandate generally denies each and every allegation contained therein pursuant to
section 431.30, subdivision (d), of the California Code of Civil Procedure.

WHEREFORE, respondent and defendant Newland prays for relief as follows:

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1. That the petition and complaint as against respondent and defendant Newland
be denied;

2. That petitioners and plaintiffs' claims against respondent and defendant Newland be
dismissed;

3. That judgment be entered in favor of respondent and defendant Newland;

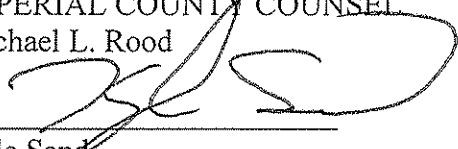
4. For attorney fees;

5. For costs of suit;

6. For such other and further relief as the court deems proper.

Dated: October 22, 2012

IMPERIAL COUNTY COUNSEL
Michael L. Rood

By 

Kyle Sand,
Attorney for Defendant,
Imperial County Auditor Controller

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**DECLARATION OF SERVICE
BY FEDERAL EXPRESS MAIL**

STATE OF CALIFORNIA]
]
COUNTY OF IMPERIAL]

Case No. 34-2012-80001269

ss

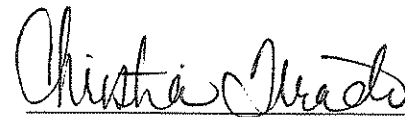
I am an employee in Imperial County, State of California; I am over the age of eighteen years; I am not a party to the above-entitled proceeding; and my business address is Office of the County Counsel, County Administration Center, 940 W. Main Street, Suite 205, El Centro, CA 92243.

On October 22, 2012, I placed the **GENERAL DENIAL OF RESPONDENT DOUGLAS NEWLAND, IN HIS OFFICIAL CAPACITY AS IMPERIAL COUNTY AUDITOR-CONTROLLER, TO COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND PETITION FOR WRIT OF MANDATE**, in a sealed FedEx Letter package, for collection by Federal Express personnel. The document referred to was addressed as follows:

**Attn: Clerk
Gordon D. Schaber Court House
720 9th Street
Sacramento, CA 95814**

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct. Dated and executed on October 22, 2012, in El Centro, California.

Christina Tirado



Printed/Typed Name of Declarant

Signature

DECLARATION OF SERVICE BY U.S. MAIL

STATE OF CALIFORNIA
COUNTY OF IMPERIAL

}
}
}

34-2012-80001269

I am an employee in the County of Imperial, State of California; I am over the age of eighteen years; I am not a party to the above-entitled proceeding; and my business address is Office of the County Counsel, County Administration Center, 940 West Main Street, Suite 205, El Centro, CA 92243.

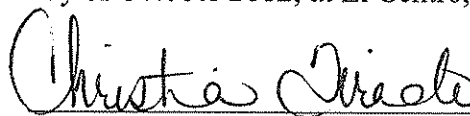
On October 22, 2012, I served the following documents:

GENERAL DENIAL OF RESPONDENT DOUGLAS NEWLAND, IN HIS OFFICIAL CAPACITY AS IMPERIAL COUNTY AUDITOR-CONTROLLER, TO COMPLAINT FOR DECLARATORY AND INJUNCTIVE RELIEF AND PETITION FOR WRIT OF MANDATE

by placing the documents in a sealed envelope and deposited the document to be delivered by U.S. Mail to the following addresses:

SEE ATTACHED SERVICE LIST

I declare under penalty of perjury under the laws of the State of California, that the foregoing is true and correct. Dated and executed on the 22nd day of October 2012, at El Centro, California.


Christina Tirado

Case Name: City of Bellflower, et al. v. Ana Matosantos, et al.
No.: 34-2012-80001269

SERVICE LIST

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Sacramento, CA 94244-2550