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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF PLACER**

10 **PLACER COUNTY DEPUTY**  
11 **SHERIFFS’ ASSOCIATION and NOAH**  
12 **FREDERITO,**

13 **Petitioners,**

14 **v.**

15 **COUNTY OF PLACER,**

16 **Respondent.**

Case No.: S-CV-0047770

Complaint Filed: December 21, 2021

**REQUEST FOR JUDICIAL NOTICE IN  
SUPPORT OF RESPONDENT COUNTY OF  
PLACER’S DEMURRER TO, AND MOTION  
TO STRIKE PORTIONS OF, PETITIONERS’  
AMENDED VERIFIED PETITION FOR WRIT  
OF MANDATE AND COMPLAINT FOR  
DECLARATORY RELIEF**

Date: March 3, 2022  
Time: 8:30 am  
Dept.: 42

**(\*Exempt from filing fees pursuant to Gov.  
Code, § 6103.)**

20 Respondent COUNTY OF PLACER (“County”) respectfully asks the Court to take  
21 judicial notice, pursuant to Evidence Code sections 451, 452, and 453, of the following  
22 documents in support of the County’s Demurrer and Motion to Strike filed concurrently herewith  
23 in response to the Amended Petition for Writ of Mandate and Complaint for Declaratory Relief  
24 filed by Petitioners Placer County Deputy Sheriffs’ Association and Noah Frederito (collectively  
25 “Petitioners”) on January 21, 2022:

- 26 1. Placer County Board of Supervisors Resolution No. 76-449, dated August 24,  
27 1976, recognizing a petition bearing the requisite number of signatures calling for  
28 an election on a proposed ordinance for salaries for Sheriff’s personnel, a true and

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- 1 correct copy of which is attached to the Declaration of Ryan Ronco, filed  
2 concurrently herewith, as **Exhibit A**.
- 3 2. The Placer County Sheriff’s Salaries Ordinance Initiative (also known as  
4 “Measure F”) as it appeared on the election ballot for Placer County in the general  
5 election held November 2, 1976, a true and correct copy of which is attached to the  
6 Declaration of Ryan Ronco, filed concurrently herewith, as **Exhibit B**.
- 7 3. The vote totals for and against Measure F in the Placer County general election  
8 held November 2, 1976, a true and correct copy of which is attached to the  
9 Declaration of Ryan Ronco, filed concurrently herewith, as **Exhibit C**.
- 10 4. The Proposed Adoption of the Placer County Charter (also known as “Measure  
11 K”), as it appeared on the election ballot for Placer County in the general election  
12 held November 4, 1980, a true and correct copy of which is attached to the  
13 Declaration of Ryan Ronco, filed concurrently herewith, as **Exhibit D**.
- 14 5. The vote totals for and against Measure K in the Placer County general election  
15 held November 4, 1980, a true and correct copy of which is attached to the  
16 Declaration of Ryan Ronco, filed concurrently herewith, as **Exhibit E**.

17 The Court may take judicial notice of Exhibits A, B, and D because they are legislative  
18 enactments issued by or under the authority of a public entity in the United States, and because  
19 initiative measures and ballot materials are subject to judicial notice. (Evid. Code § 452, subd.  
20 (b); *People v. Hazelton* (1996) 14 Cal.4th 101, 107 n.2.) The Court may also take notice of  
21 Exhibit D because a court “shall” take judicial notice of the provisions of a duly adopted County  
22 charter. (Evid. Code § 451, subd. (a).) The Court may take notice of Exhibits C and E because  
23 “[t]he result of a public election is a fact not reasonably subject to dispute and capable of  
24 immediate and accurate determination by resort to sources of reasonably indisputable accuracy.  
25 (Evid. Code, § 452, subd. (h); *Yumori-Kaku v. City of Santa Clara* (2020) 59 Cal.App.5th 385,  
26 408 n.7.)

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1 Respondent has given sufficient notice of its request for judicial notice to Petitioners  
2 through the pleadings in this case, and has provided sufficient information with this Request to  
3 enable the Court to take judicial notice. (Evid. Code § 453.)

4 Therefore, the County requests that the Court take judicial notice of Exhibits A through E.

5 Dated: February 2, 2022

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7  
8 By: 

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