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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 IN AND FOR THE COUNTY OF PLACER

10
11 PLACER COUNTY DEPUTY SHERIFFS’
ASSOCIATION and NOAH FREDERTIO,

12 Petitioners,

13 vs.

14 COUNTY OF PLACER

15 Defendants.

Case No.: S-CV-0047770

**PETITIONERS’ APPENDIX OF
EVIDENTIARY EXHIBITS IN
OPPOSITION TO RESPONDENT’S
MOTION FOR SUMMARY JUDGMENT
OR, IN THE ALTERNATIVE,
SUMMARY ADJUDICATION**

Date: January 26, 2023
Time: 8:30 a.m.
Department: 3

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18 TO THE COURT, RESPONDENT, AND THEIR ATTORNEYS OF RECORD:

19 Petitioner Placer County Deputy Sheriffs’ Association (“PCDSA”) and Noah Frederito
20 respectfully submits the following exhibits in Opposition to Respondent’s Motion for Summary
21 Judgment or, in the Alternative, Summary Adjudication:

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1 **DECLARATION OF DAVID E. MASTAGNI**

2 Exhibit A — December 1, 2022 Deposition Transcript of Kate Sampson

3 Exhibit 2 — County of Placer Ordinance Initiative dated November 2, 1976

4 Exhibit 3 — August 1, 1980 Letter by the Placer County Charter Commission
5 with Placer County Charter

6 Exhibit 4 — Charter of the County of Placer

7 Exhibit 5 — Charter Signature Roster dated December 9, 1980

8 Exhibit 6 — Resolution No. 2002-184 Ordering Ballot Measure Repealing
9 Measure F

10 Exhibit 7 — November 5, 2002 Election Ballot Sample

11 Exhibit 8 — Measure R

12 Exhibit 9 — July 15, 2002 Letter to Board of Supervisors from Jeffrey Potter

13 Exhibit 10 — Resolution No. 2006-30 Ordering Ballot Measure to Repeal
14 Measure F as Adopted on February 7, 2006

15 Exhibit 11 — Measure A Proposal to Repeal Measure F

16 Exhibit 12 — Argument in Favor of Measure A

17 Exhibit 13 — Resolution No. 2006-30 Ordering Ballot Measure to Repeal
18 Measure F with Measure A Ballot Question

19 Exhibit 14 — June 6, 2006 Gubernatorial Primary Election Ballot Summary

20 Exhibit 15 — January 7, 2004 Memorandum from Jan M. Christofferson to the
21 Represented Employees of the Deputy Sheriffs' Association

22 Exhibit 19 — August 3, 2003 Gold County Media Article titled "Proposition F,
23 not County, Determines Deputy Salaries"

24 Exhibit B — Placer County Code § 3.12.040

25 Exhibit C — Portions of Placer County Board of Supervisors Agenda Packets

26 **DECLARATION OF NOAH FREDERITO**

27 Exhibit A — County of Placer's July 21, 2020 Last, Best, and Final Offer

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1 Exhibit B — County of Placer’s September 2020 Questions & Answers about Contract
2 Negotiations between the County and the PCDSA

3 Exhibit C — County of Placer’s October 26, 2020 Position Statement

4 Exhibit D — County of Placer’s December 8, 2020 Proposal to the PCDSA

5 Exhibit E — Ordinance 6060-B Amending Placer County Code § 3.12.040 as Adopted
6 on January 12, 2021

7 Exhibit F — MOU between Placer County and the PCDSA for 2015-2018

8 Exhibit G — MOU between Placer County and the PCDSA for 2000-2002

9 Exhibit H — MOU between Placer County and the PCDSA for 2003-2006

10 Exhibit I — MOU between Placer County and the PCDSA for 2010-2012

11 Exhibit J — MOU between Placer County and the PCDSA for 2012-2015

12 Exhibit K — Resolution No. 2021-301 as passed on September 14, 2021

13 Exhibit L — December 2020 Total Compensation Survey for Deputy Sheriff II –
14 Classic Member

15 Exhibit M — County’s August 27, 2020 Impasse Letter

16 Exhibit N — PCDSA’s October 21, 2020 Factfinding Request

17 Exhibit O — PCDSA’s UPC filed September 24, 2020

18 Exhibit P — March 23, 2022 Complaint issued by PERB

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20 **DECLARATION OF LAURIE BETTENCOURT**

21 Exhibit A — PCDSA Executive Board and General Meeting Agendas from July 12,
22 2006; March 28, 2006; January 24, 2006; April 24, 2006; September 21,
23 2006; and August 24, 2006

24 Exhibit B — Ordinance 5441-B as Adopted on November 20, 2006

25 Exhibit C — Ordinance 5478-B as Adopted on July 24, 2007

26 Exhibit D — PCDSA’s November 10, 2006 Proposal to Placer County

27 Exhibit E — PCDSA’s January 28, 2008 Proposal to Placer County

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1 Exhibit F — Placer County’s February 15, 2008 Last, Best, and Final Offer to the
2 PCDSA

3 Exhibit G — PCDSA’s June 26, 2008 Proposal to Placer County

4 Exhibit H — Placer County’s July 9, 2008 Proposal to the PCDSA

5 Exhibit I — Placer County’s August 3, 2009 Proposal to the PCDSA

6 Exhibit J — October 7, 2010 Tentative Agreement

7 Exhibit K — Ordinance 5572-B as Adopted on September 22, 2009

8 **DECLARATION OF DAVID TOPAZ**

9 Exhibit A — Ordinance 5572-B as Adopted on September 22, 2009

10 Exhibit B — Placer County’s July 9, 2008 Counterproposal to the PCDSA

11 Exhibit C — Placer County’s August 3, 3009 Counterproposal to the PCDSA

12 Exhibit D — Resolution No. 2009-246 as Adopted on September 8, 2009

13 Exhibit E — October 7, 2010 Tentative Agreement between Placer County and the
14 PCDSA

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16 Dated: January 12, 2023

MASTAGNI HOLSTEDT, A.P.C.

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19 DAVID E. MASTAGNI
20 TAYLOR DAVIES-MAHAFFEY
21 Attorneys for Petitioners