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7 GRASS VALLEY NEIGHBORS

FILED
Superior Court Of California,
Sacramento
08/15/2018
mrubalcaba
By _____, Deputy
Case Number:
34-2018-80002957

8 SUPERIOR COURT OF CALIFORNIA

9 COUNTY OF SACRAMENTO

10
11 GRASS VALLEY NEIGHBORS, a nonprofit
12 unincorporated association,

CASE NO.

13 Petitioner/Plaintiff,

NOTICE OF COMMENCEMENT OF
ACTION

14 vs.

15 CALIFORNIA STATE WATER
16 RESOURCES CONTROL BOARD, BY AND
17 THROUGH THE CENTRAL VALLEY
18 REGIONAL WATER QUALITY CONTROL
19 BOARD; YUBA COUNTY, BY AND
20 THROUGH ITS BOARD OF
SUPERVISORS; CALIFORNIA
DEPARTMENT OF FISH AND WILDLIFE;
CENTRAL VALLEY FLOOD PROTECTION
BOARD; and DOES 1-20, inclusive,

Filed Pursuant to the
California Environmental Quality Act

21 Respondents/Defendants.
22 _____ /

23 YUBA COUNTY MOTORPLEX, LLC, a
24 Delaware limited liability company; YUBA
25 COUNTY ENTERTAINMENT, LLC, a
Delaware limited liability company; and
DOES 21-40, inclusive,

26 Real Parties in Interest.
27 _____ /

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1 TO: CALIFORNIA STATE WATER RESOURCES CONTROL BOARD, BY AND
2 THROUGH THE CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL
3 BOARD; YUBA COUNTY, BY AND THROUGH ITS BOARD OF SUPERVISORS;
4 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE; and CENTRAL VALLEY
5 FLOOD PROTECTION BOARD:

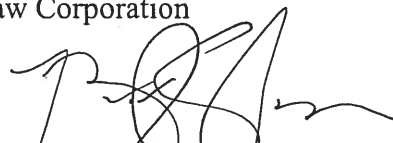
6 Pursuant to Public Resources Code §21167.5, notice is hereby given that an action will be
7 commenced against CALIFORNIA STATE WATER RESOURCES CONTROL BOARD, BY
8 AND THROUGH THE CENTRAL VALLEY REGIONAL WATER QUALITY CONTROL
9 BOARD; YUBA COUNTY, BY AND THROUGH ITS BOARD OF SUPERVISORS;
10 CALIFORNIA DEPARTMENT OF FISH AND WILDLIFE; and CENTRAL VALLEY
11 FLOOD PROTECTION BOARD by filing a Verified Petition for Writ of Mandate and
12 Complaint for Preliminary and Permanent Injunctive Relief, and for Declaratory Relief,
13 challenging Respondents/Defendants' failure to comply with CEQA and local, state, and federal
14 laws intended to protect the environment. The Petition-Complaint will be filed in the above-
15 entitled court and will be served pursuant to the requirements of Public Resources Code §§
16 21167.6(a) and 21167.6.5.

17 Respectfully submitted,

18 DATED: August 13, 2018

19 BRIGIT S. BARNES & ASSOCIATES, INC.,
A Law Corporation

20
21 By:



22 BRIGIT S. BARNES, Attorneys for
23 Petitioner/Plaintiff GRASS VALLEY
24 NEIGHBORS
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1 Matter: *Grass Valley Neighbors vs. California State Water Resources Control Board,*
2 *et al.*, Sacramento County Superior Court, Case No. TBD

3 **PROOF OF SERVICE**

4 I am a citizen of the United States, over the age of eighteen years, and not a party to or
5 interested in the within entitled cause. I am an employee of Brigit S. Barnes & Associates, Inc.,
6 A Law Corporation, located at 3262 Penryn Road, Suite 200, Loomis, California, 95650. On this
7 date, I served the following document:

- 8 **➤ NOTICE OF COMMENCEMENT OF ACTION; and**
9 **➤ Letter to Central Valley Regional Water Quality Control Board, et al. regarding**
10 **Notice of Commencement of Action and Filing of Petition-Complaint**

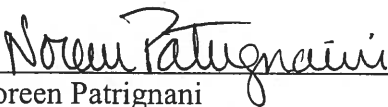
11 X **BY U.S. MAIL [C.C.P. §1013(a)]** by enclosing one copy thereof in a sealed
12 envelope, with postage thereon fully prepaid. I am readily familiar with this
13 firm's practice for the collection and processing of correspondence for mailing
14 with the United States Postal Service, and that said correspondence is deposited
15 with the United States Postal Service on the same day in the ordinary course of
16 business. Said correspondence was addressed as set forth below; and/or

17 X **BY ELECTRONIC SERVICE [C.C.P. §1010.6]** by electronically mailing a
18 true and correct copy via Brigit S. Barnes & Associates, Inc.'s electronic mail
19 system to the e-mail address(es) set forth below, or as stated on the attached
20 service list per agreement in accordance with C.C.P §1010.6.

21 **PARTY(S) SERVED:**

22 SEE ATTACHED SERVICE LIST

23 I declare, under penalty of perjury under the laws of the State of California, that the
24 foregoing is true and correct. Executed on August 13, 2018, at Loomis, California.

25 
26 _____
27 Noreen Patrignani
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SERVICE LIST

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Patrick E. Palupa, Executive Officer
c/o Kiran Lanfranchi, Executive Assistant to the Board
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670
Email: klanfranchi@waterboards.ca.gov

Rachel Ferris, Clerk of the Board of Supervisors
Yuba County Board of Supervisors
915 8th Street, Suite 109
Marysville, CA 95901
Email: rferris@co.yuba.ca.us

California Department of Fish and Wildlife
c/o Legal Department
1416 9th Street, 12th Floor
Sacramento, CA 95814

Katherine Baines, Clerk of the Board
Central Valley Flood Protection Board
3310 El Camino Avenue, Suite 170
Sacramento, CA 95821
Email: Katherine.Baines@CVFlood.ca.gov