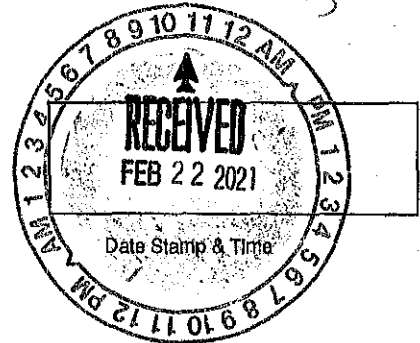


**OFFICE OF THE ATTORNEY GENERAL  
DEPARTMENT OF JUSTICE  
Civil Service of Process Cover Sheet**

SAC SF OAK LA SD FR



Service of Process Disclaimer:

To All Persons Attempting Service of Process Upon The Office Of The Attorney General:

Please be advised that staff assigned to receive documents delivered to the Attorney General's Office are not authorized to accept such documents as properly served. Further, staff are not authorized to receive documents on behalf of any individual. In receiving documents delivered by process servers and/or other members of the public, office personnel do not thereby waive any right of the State of California, the Attorney General's Office, any other entity of the State of California, or any individual to object to the validity of the service.

Please complete this form when delivering documents to the Attorney General's Office:

Case Name: SECURUS V CA DEPT	
County: Sacramento	Court No.: 34202180003594
Document(s) served:	<input type="checkbox"/> Summons and Complaint/Cross Complaint/Amended Complaint <input type="checkbox"/> Notice to Attorney General's Office pursuant to Section _____ <input type="checkbox"/> Petition For Relief From Late Claim Filing (Gov. Code, § 946.6) <input type="checkbox"/> Pitchess Motion <input type="checkbox"/> Small Claims <input type="checkbox"/> Deposition Subpoena for Production of Business Records <input type="checkbox"/> Notice of Consumer or Employee and Objection and check for \$15.00 <input checked="" type="checkbox"/> Writ of Mandate and Complaint for Declaratory Relief <input type="checkbox"/> Other (please list): _____ _____ _____
Document(s) For (Specify State Agency):	Attorney General
Process Server's Name:	Nancy Graddy
Name of Company: (business name, address, and number)	First Legal Support 1814 "I" Street Sacramento, CA 95814 (916) 444-5111
Receptionist Signature:	<i>B. S. [Signature]</i> #28
<b>FOR SERVICE DEPUTY'S USE ONLY</b>	
Forwarded to:	Date Forwarded:
Name of Service Deputy, section, and telephone number:	
NOTES:	

The attached document(s) appear(s) to be the responsibility of your section; if they are not, please return them to the Service Deputy named above, noting the section to which they are to be directed. (Rev. 7/2014)

**SUMMONS  
(CITACION JUDICIAL)**

**NOTICE TO DEFENDANT:  
(AVISO AL DEMANDADO):**

CALIFORNIA DEPARTMENT OF TECHNOLOGY, CALIFORNIA DEPARTMENT OF CORRECTIONS AND REHABILITATION, and DOES 1 through 100, inclusive, Respondents; GLOBAL TEL\*LINK CORPORATION, a Delaware Corporation, Real Party In Interest.

**YOU ARE BEING SUED BY PLAINTIFF:  
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**  
SECURUS TECHNOLOGIES, LLC

FOR COURT USE ONLY  
(SOLO PARA USO DE LA CORTE)

**FILED/ENDORSED**

FEB 16 2021

By: I. Romo  
Deputy Clerk

**NOTICE!** You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), the California Courts Online Self-Help Center ([www.courtinfo.ca.gov/selfhelp](http://www.courtinfo.ca.gov/selfhelp)), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case. **¡AVISO!** Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la Información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services ([www.lawhelpcalifornia.org](http://www.lawhelpcalifornia.org)), en el Centro de Ayuda de las Cortes de California ([www.sucorte.ca.gov](http://www.sucorte.ca.gov)) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:  
(El nombre y dirección de la corte es):

Superior Court of California - County of Sacramento  
720 Ninth Street - Room 102, Sacramento CA 95814-1380

CASE NUMBER:  
(Número del Caso):

34-2021-80003594

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):  
Timothy L. Pierce (SBN 141170) Hector H. Espinosa (SBN 222426)

K&L GATES LLP

10100 Santa Monica Blvd., Los Angeles, CA 90067 Telephone: (310) 552-5001

**I. ROMO**

DATE:

Clerk, by

, Deputy

(Fecha)

**FEB 16 2021**

(Secretario)

(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

(SEAL)



**NOTICE TO THE PERSON SERVED:** You are served

1.  as an individual defendant.
2.  as the person sued under the fictitious name of (specify):
3.  on behalf of (specify):  
under:
 

<input type="checkbox"/> CCP 416.10 (corporation)	<input type="checkbox"/> CCP 416.60 (minor)
<input type="checkbox"/> CCP 416.20 (defunct corporation)	<input type="checkbox"/> CCP 416.70 (conservatee)
<input type="checkbox"/> CCP 416.40 (association or partnership)	<input type="checkbox"/> CCP 416.90 (authorized person)
<input type="checkbox"/> other (specify):	
4.  by personal delivery on (date):

BY FAX

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):  
 Timothy L. Pierce (141170); Hector H Espinosa (222426)  
 10100 Santa Monica Blvd., 7th Fl,  
 Los Angeles CA 90067

TELEPHONE NO.: 310-552-5000 FAX NO. (Optional): 310-562-5001

ATTORNEY FOR (Name): Petitioner Securus Technologies, LLC

FOR COURT USE ONLY

**FILED/ENDORSED**

FEB 11 2021

By: I. Romo  
 Deputy Clerk

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SACRAMENTO  
 STREET ADDRESS: 720 Ninth Street - Room 102  
 MAILING ADDRESS:  
 CITY AND ZIP CODE: Sacramento CA 95814  
 BRANCH NAME:

CASE NAME:  
 Securus Technologies, LLC vs. Cal. Dept. of Tech.; Cal. Dept. of Corrections and Rehab.; & Does

**CIVIL CASE COVER SHEET**

**Unlimited** (Amount demanded exceeds \$25,000)  **Limited** (Amount demanded is \$25,000)

**Counter**  **Joinder**

Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)

CASE NUMBER:  
**34-2021-80003594**

JUDGE:  
 DEPT:

Items 1-6 below must be completed (see instructions on page 2).

1. Check one box below for the case type that best describes this case:

<p><b>Auto Tort</b></p> <p><input type="checkbox"/> Auto (22)</p> <p><input type="checkbox"/> Uninsured motorist (46)</p> <p><b>Other PII/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort</b></p> <p><input type="checkbox"/> Asbestos (04)</p> <p><input type="checkbox"/> Product liability (24)</p> <p><input type="checkbox"/> Medical malpractice (45)</p> <p><input type="checkbox"/> Other PII/PD/WD (23)</p> <p><b>Non-PII/PD/WD (Other) Tort</b></p> <p><input type="checkbox"/> Business tort/unfair business practice (07)</p> <p><input type="checkbox"/> Civil rights (08)</p> <p><input type="checkbox"/> Defamation (13)</p> <p><input type="checkbox"/> Fraud (18)</p> <p><input type="checkbox"/> Intellectual property (19)</p> <p><input type="checkbox"/> Professional negligence (25)</p> <p><input type="checkbox"/> Other non-PII/PD/WD tort (35)</p> <p><b>Employment</b></p> <p><input type="checkbox"/> Wrongful termination (36)</p> <p><input type="checkbox"/> Other employment (15)</p>	<p><b>Contract</b></p> <p><input type="checkbox"/> Breach of contract/warranty (06)</p> <p><input type="checkbox"/> Rule 3.740 collections (09)</p> <p><input type="checkbox"/> Other collections (09)</p> <p><input type="checkbox"/> Insurance coverage (18)</p> <p><input type="checkbox"/> Other contract (37)</p> <p><b>Real Property</b></p> <p><input type="checkbox"/> Eminent domain/inverse condemnation (14)</p> <p><input type="checkbox"/> Wrongful eviction (33)</p> <p><input type="checkbox"/> Other real property (26)</p> <p><b>Unlawful Detainer</b></p> <p><input type="checkbox"/> Commercial (31)</p> <p><input type="checkbox"/> Residential (32)</p> <p><input type="checkbox"/> Drugs (38)</p> <p><b>Judicial Review</b></p> <p><input type="checkbox"/> Asset forfeiture (05)</p> <p><input type="checkbox"/> Petition re: arbitration award (11)</p> <p><input type="checkbox"/> Writ of mandate (02)</p> <p><input type="checkbox"/> Other judicial review (39)</p>	<p><b>Provisionally Complex Civil Litigation</b> (Cal. Rules of Court, rules 3.400-3.403)</p> <p><input type="checkbox"/> Antitrust/Trade regulation (03)</p> <p><input type="checkbox"/> Construction defect (10)</p> <p><input type="checkbox"/> Mass tort (40)</p> <p><input type="checkbox"/> Securities litigation (28)</p> <p><input type="checkbox"/> Environmental/Toxic tort (30)</p> <p><input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41)</p> <p><b>Enforcement of Judgment</b></p> <p><input type="checkbox"/> Enforcement of judgment (20)</p> <p><b>Miscellaneous Civil Complaint</b></p> <p><input type="checkbox"/> RICO (27)</p> <p><input type="checkbox"/> Other complaint (not specified above) (42)</p> <p><b>Miscellaneous Civil Petition</b></p> <p><input type="checkbox"/> Partnership and corporate governance (21)</p> <p><input checked="" type="checkbox"/> Other petition (not specified above) (43)</p>
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2. This case  is  is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

a.  Large number of separately represented parties d.  Large number of witnesses

b.  Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve e.  Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court

c.  Substantial amount of documentary evidence f.  Substantial postjudgment judicial supervision

3. Remedies sought (check all that apply): a.  monetary b.  nonmonetary; declaratory or injunctive relief c.  punitive

4. Number of causes of action (specify): three

5. This case  is  is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: February 11, 2021  
 Hector H. Espinosa

(TYPE OR PRINT NAME) (SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

**NOTICE**

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on all other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

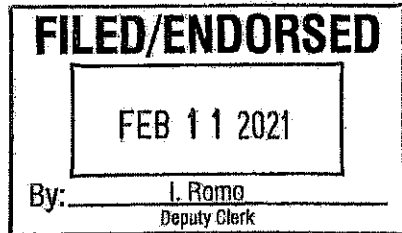
Page 1 of 2

BY FAX

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**K&L GATES LLP**  
10100 Santa Monica Boulevard  
Seventh Floor  
Los Angeles, California 90067  
Telephone: 310.552.5000  
Facsimile: 310.552.5001

Timothy L. Pierce, Bar No. 141170  
Hector H. Espinosa, Bar No. 222426  
Attorneys for Petitioner Securus Technologies,  
LLC



SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SACRAMENTO

SECURUS TECHNOLOGIES, LLC,  
  
Petitioner,  
  
vs.  
  
CALIFORNIA DEPARTMENT OF  
TECHNOLOGY, CALIFORNIA  
DEPARTMENT OF CORRECTIONS AND  
REHABILITATION, and DOES 1 through 100,  
inclusive,  
  
Respondents,  
  
GLOBAL TEL\*LINK CORPORATION, a  
Delaware Corporation,  
  
Real Party In Interest.

Case No. 34-2021-80003594

PETITION FOR (1) WRIT OF MANDATE,  
(2) INJUNCTION, AND (3)  
DECLARATORY JUDGMENT

Petitioner Securus Technologies, LLC ("Securus" or "Petitioner"), pursuant to California Public Contract Code section 6611 and California Code of Civil Procedure section 1085, petitions the Court for a writ of mandate, an injunction and a declaratory judgment against respondent California Department of Technology, respondent California Department of Corrections and Rehabilitation, and Does 1 through 100, together with Real Party In Interest Global Tel\*Link Corporation, herein as follows:

BY FAX

1 OVERVIEW

2 1. This lawsuit concerns harm to the taxpayers of California as a result of the State  
3 failing to abide by applicable public bidding laws, violating equitable principles of fairness and  
4 disregarding its obligations to the State's taxpayers.

5  
6 2. As such, Petitioner seeks to enjoin violations of California public contracting laws in  
7 connection with the California Department of Technology ("CDT") award and execution of a  
8 contract ("Contract") with Global Tel\*Link Corporation ("GTL") pursuant to a Request for Proposal  
9 ("RFP") to provide communication technology (including incarcerated individual voice calling,  
10 incarcerated individual video calling and incarcerated individual tablets) for the California  
11 Department of Corrections and Rehabilitation ("CDCR").

12  
13 3. The RFP contained a not-to-exceed cap on calling rates of \$0.05 per minute ("NTE")  
14 for *all calling types*, which the RFP defined to include voice and video calls. The State further made  
15 clear during negotiations (as well as in a post-award debriefing) that this NTE rate applied to *all types*  
16 *of calls*, including video calls and international voice calls.

17  
18 4. GTL proposed charging a per minute video calling rate of \$0.25, which is 500% over  
19 the NTE, and a per minute international voice calling rate of \$0.07, which is 40% over the NTE.  
20 Either of these two rates undisputedly violated the RFP and required that the State disqualify GTL  
21 and reject its proposal.

22  
23 5. Securus on the other hand, proposed charging rates on *all calls* that complied with the  
24 NTE requirements in the RFP.

25  
26 6. The State not only did not disqualify GTL as required by the RFP, but allowed GTL to  
27 move forward into negotiations with two of its four calling rates significantly exceeding the NTE  
28 rates mandated by the RFP.

1           7.       Because the State ignored GTL’s violations of the NTE calling rate and improperly  
2 chose GTL over Securus, incarcerated individuals and their families will now pay *over \$12,000,000*  
3 *more per year for video calling than they would have under Securus.*

4           8.       The State also failed to disqualify GTL for its inability to satisfy the requirement for  
5 references of past performance with a project of similar complexity as this Contract. In fact, the State  
6 awarded GTL incremental points for having 3 products in 3 other jurisdictions for 5 years when in  
7 fact GTL admitted under questioning from the State that they were merely “in the process of  
8 installing” at some of those jurisdictions.  
9

10          9.       Accordingly, the State violated California law, by among other things, arbitrarily and  
11 capriciously conducting the RFP process, abusing its discretion, and exceeding its statutory authority.  
12 As such, the Contract award to GTL is illegal.  
13

14          10.       In accordance with Public Contract Code § 6611, Securus brings this action to enjoin  
15 the award of the Contract to GTL, declare the Contract illegal and null and void, and require the State  
16 to disqualify GTL and award the Contract to Securus, the second place finisher. Alternatively,  
17 Securus requests that the Court require the State to conduct a re-bid in accordance with California  
18 law.  
19

20    **PARTIES**

21          11.       Petitioner, Securus Technologies, LLC (“Securus”), is among the largest providers of  
22 incarcerated individual telecommunications systems in the United States, having designed, installed  
23 and serviced incarcerated individual telephone systems at over 3,100 facilities.

24          12.       Petitioner was an unsuccessful bidder for the Contract for CDCR and has a substantial  
25 interest in the State’s expenditures and contract procurement process. Petitioner has been injured by  
26 the State’s violation of law in awarding the Contract to GTL, which is not in the best interest of the  
27 taxpayers of the State of California and would result in unauthorized and/or unlawful waste of public  
28 funds.

1           13.     Petitioner believes that the Contract with GTL is illegal and not in the best interest of  
2 the State. In bringing this action, Petitioner seeks to prevent the unauthorized and/or unlawful waste  
3 of public funds caused by the State's unlawful, arbitrary and capricious actions. Petitioner seeks to  
4 have the State lead a transparent and fair bidding process according to the State's own criteria.  
5

6           14.     Respondent, CDT, is and was at all times relevant hereto a public agency in the State  
7 of California existing under and by virtue of the laws of the State of California.

8           15.     Respondent, CDCR, is and was at all times relevant hereto a public agency in the State  
9 of California existing under and by virtue of the laws of the State of California.

10          16.     Real Party In Interest GTL is a Delaware corporation with its principal place of  
11 business located in Virginia at 3120 Fairview Park Drive, Suite 300, Falls Church, Virginia 22042.  
12

13          17.     The true names and capacities, whether individual, corporate, associate or otherwise,  
14 of respondents sued herein as Does 1 through 100, inclusive, are unknown to Petitioner and Petitioner  
15 therefore sues said respondents by said fictitious names. Petitioner will amend this Petition to state  
16 the true names and capacities of said respondents when the same have been ascertained. Respondents  
17 CDT, CDCR, and Does 1 through 100 are collectively hereafter referred to as the "State."  
18

19          18.     Petitioner is informed and believes and thereon alleges that at all material times  
20 herein, each State Respondent named in this Petition was the agent, employee or representative of  
21 every other State Respondent, including fictitiously-named respondents. Petitioner is further  
22 informed and believes that each State Respondent named herein committed acts and omissions which  
23 damaged Petitioner, and in so doing acted within the scope and course of its agency with every other  
24 State Respondent named herein and each of them authorized, directed, accepted, ratified and  
25 approved of such actions.  
26  
27  
28

1 **FACTUAL BACKGROUND**

2 **A. The State Issues an RFP for a New Communications and Technology Solution for**  
3 **CDCR.**

4 19. On August 11, 2020, the State issued RFP CDCR08112020 for Communications and  
5 Technology Solution for the CDCR.

6 20. The State issued two addendums to the RFP; Addendum #1 was issued on September  
7 25, 2020 and Addendum #2 was issued on October 13, 2020.

8 21. The RFP solicited bids to provide a communication technology solution (“CTS”) for  
9 CDRC which would include three major products per the statement of work provided by the State,  
10 incarcerated individual voice calling, incarcerated individual video calling and incarcerated  
11 individual tablets.

12 22. One of the goals of the RFP was to provide “enhanced incarcerated individual  
13 communications, provide electronic access to new services and increase access to existing services  
14 for incarcerated individuals through advancements in technology to increase rehabilitative  
15 opportunities.” Exhibit 1, RFP Parts 1 and 2 Addendum 2 at Section 1.1, page 13 of 230.

16 23. The RFP listed as one of its “communications business objectives” to “[p]rovide  
17 communications services consisting of voice, email, e-letters, and video calling to communicate with  
18 family, friends, and other authorized individuals.” Exhibit 1, RFP Parts 1 and 2 Addendum 2 at  
19 Section 1.4.4.1, page 31 of 230.

20 24. In this regard, the RFP provided that the successful bidder was to implement both  
21 traditional voice calling as well as video calling - which the State does not currently have:

22  
23 In terms of communication services, the most significant change is the implementation  
24 of live video calling and electronic messaging. In the proposed environment,  
25 Incarcerated individuals will have the ability to schedule and make video calls. This  
26 operates much like a correctional-grade Skype call that is monitored and recorded.

27 Exhibit 1, RFP Parts 1 and 2 Addendum 2 at Section 1.4.4.1, page 30 at 232.  
28



1           25.    The Contract awarded pursuant to the RFP would be a revenue generating concession  
2 contract as the State does not incur any cost and is not obligated to pay the contractor for any  
3 products or services.

4           26.    Instead, the contractor would be responsible for all costs associated with  
5 implementation and installation of equipment and services and must pay the State an annual Contract  
6 Administrative Fee of \$200,000.

7           27.    In exchange, the winning bidder would receive the right to operate and collect  
8 revenues charging calling rates.

9           28.    Another goal of the RFP was to obtain the lowest pricing possible: *“The intent is to  
10 structure the pricing format in order to facilitate a straightforward comparison among all Bidders  
11 and foster competition to obtain the best market pricing to ensure the lowest possible rates, fees, and  
12 product cost for Incarcerated individuals, family, and friends. Since no commissions are paid to the  
13 State, the pricing for CTS services are expected to be lower than other State DOCs and shall not  
14 exceed the current rates/pricing for these services.”* Exhibit 1, RFP Parts 1 and 2 Addendum 2 at  
15 Section 5, page 90-91 of 230.

16           29.    In this regard, the RFP made clear that the bidder’s rates *for all calls - including  
17 video and voice calls* - could not exceed a \$0.05 per minute NTE cap:

18           Cost is a primary evaluation criterion weighted at 30% of the total 2,000 points.  
19 Evaluation in this category will be based on the lowest total estimated net cost as  
20 calculated according to the methodology in this section and Section 7, Evaluation.

21           **The State has established not-to-exceed (NTE) rates for this procurement.  
22 Bidder’s rates for calls must not exceed \$.05 per minute. Bidders may propose  
23 rates lower than the NTE identified.**

24           All proposed costs for all line items must be all inclusive, thereby including the cost of  
25 any and all services required in this solicitation.

26           Id. (emphasis in original).

27           30.    In other words, the RFP was clear in Section 5 - Cost, that the State was establishing  
28 an NTE of \$0.05 per minute for calling services with the intent of “obtaining the best market pricing

1 to ensure the lowest possible rates, fees, and product cost for Incarcerated individuals, family, and  
2 friends”. Id.

3 31. The RFP made clear that a bidder that submitted rates that failed to comply with the  
4 NTE rates **should be disqualified**. See Exhibit 1, RFP Parts 1 and 2 Addendum 2 at Attachment 2:  
5 Solicitation Submission Checklist page 222 of 230 (“ Cost Complies with NTE rates.”).

6  
7 32. As the RFP’s glossary of various terms made clear, “calls” included both voice and  
8 video calls sections:

9 **Call Detail Record (CDR)** - data record produced by the CTS that documents the  
10 details of the telephone, *video phone*, VRS, and the ASL-VCS.

11 \*\*\*\*\*

12 **Outbound Call** – telephone, *video*, VRS, or ASL-VCS calls originating from an  
13 incarcerated individual to their family or friends

14 \*\*\*\*\*

15 **Video Call** – simultaneous real-time audio and video communication between  
16 incarcerated individual and their family or friends.

17 Exhibit 1, RFP Parts 1 and 2 Addendum 2 at Attachment 5, page 223-24 of 230 (emphasis added).

18 33. The State was required to award the Contract to the “value effective proposal.”  
19 Exhibit 1, RFP Parts 1 and 2 Addendum 2 at Section 7, page 97 of 230.

20 34. The RFP then included a scoring and point allocation methodology with 2200  
21 maximum points available. Exhibit 1, RFP Parts 1 and 2 Addendum 2 at Section 7.3, page 99-100 of  
22 230.

23 35. Cost was worth 600 points. The bidder with the lowest proposed total cost not  
24 exceeding the NTE would receive the maximum score of 600 points and all other bidders would  
25 receive a proportionally lower score using the ratio of the lowest proposed total cost to the bidder’s  
26 proposed total cost applied to the maximum points of 600.

27 36. The winning bidder would be awarded a contract with an initial term of six years with  
28 four one-year options to extend for a total 10-year term.

1 **B. The State Conducts Negotiations with Securus and GTL and Awards a New Contract to**  
2 **GTL.**

3 37. On or around October 28, 2020, three bidders submitted proposals in response to the  
4 RFP to the State: GTL, Securus, and IC Solutions, Inc. ("ICS").

5 38. In its proposal, Securus submit its proposed video calling pricing in accordance with  
6 the RFP's form that requested a proposed rate for video calling *per transaction* (i.e., per video call),  
7 not per minute. Securus proposed a \$0.99 rate *per transaction* (i.e., per video call).  
8

9 39. The State then invited GTL and Securus to participate in a negotiation process.

10 40. On November 25, 2020, Securus received an email from the State containing an  
11 agenda for a negotiation session with the State which stated, "Much of the negotiation will be focused  
12 on your cost response." See Exhibit 7, 11/25/20 email from K. DeAngelis to S. Cadwell with  
13 negotiation agenda.

14 41. The State's agenda made clear that the State wanted a per minute rate for each Video  
15 Call that complied with the \$0.05 per minute NTE. See Exhibit 7, negotiation agenda. "Each Video  
16 Call (i.e., Video Visitation) - This is a per minute rate.... If services and features are not available  
17 without remaining below the Not to Exceed requirement stated in CTS RFP Parts 1 and 2 Addendum  
18 2, section 5, Cost, Bidder must remove all references of those services and features from their bid  
19 submission.").

20  
21 42. Securus had a WebEx negotiation session with the State on December 1, 2020.

22 43. During the negotiation session, the State informed Securus that its proposed video  
23 calling rate of \$0.99 was high.

24 44. Securus explained that the \$0.99 video calling rate it had submitted was for a 30  
25 minute video call.

26  
27 45. The State informed Securus that it must submit its video calling rate as a per minute  
28 rate that complies with the \$0.05 NTE.

1 46. At the conclusion of negotiations, the State requested Best and Final Offers  
2 (“BAFOs”) from Securus and GTL to clarify and document understandings reached during  
3 negotiations.

4 47. On December 9, 2020, Securus and GTL each submitted BAFOs.

5 48. Securus’ BAFO - in accordance with the direction it received from the State during its  
6 negotiation session - replaced and reduced its original video calling rate of \$0.99 per video call with a  
7 video calling rate of \$0.039 per minute.  
8

9 49. Securus’ BAFO clarified its new video calling rate as follows: *Video Calling rates*  
10 *reduced in amount and changed in billing type to \$.039/min.*”

11 50. GTL’s BAFO, proposed charging \$0.25 per minute for video calls and \$0.07 per  
12 minute for international voice calls.  
13

14 51. After submissions of BAFOs, the State apparently requested GTL agreed to lower its  
15 video call rate to \$0.20 per minute.

16 52. The State and GTL confirmed GTL’s \$0.20 *per minute* rate in a December 11, 2020  
17 email:

18 The State has reviewed GTL’s BAFO. Please confirm GTL will accept the following  
19 terms should GTL be offered a contract award:

- 20 • \$0.20 per minute Video Calling Rate - GTL Agrees.

21 See Exhibit 3, 12/11/20 email from M. Caesar to M. Patterson & K. DeAngelis.

22 53. The State evaluated the BAFOs utilizing evaluation criteria contained in the RFP.

23 54. The State determined that GTL’s “Total Final Cost” was lower than Securus’ as  
24 shown in the below chart:

25

Bidder	Option 1	Option 2
Securus	\$18,949,574.39	\$27,934,574.39
GTL	\$12,822,062.20	\$20,307,062.20

26  
27  
28

1 See Exhibit 2, Evaluation and Selection Report dated December 18, 2020.

2 55. The State's Evaluation and Selection Report found that "GTL achieved the highest  
3 BAFO score and provided the most value effective Incarcerated individuals Communications and  
4 Technology Solution" as shown by the below final scoring:  
5

	GTL	Securus
Bidder Total Non-Cost Score	1,362.15	1,312.71
Bidder Total Cost Score	600	284
Bidder Total BAFO Score	1962.15	1596.71
DVBE Incentive Points Awarded	100	100
Bidder BAFO Score, with Preferences and Incentives	2062.15	1696.71

6  
7  
8  
9  
10 See Exhibit 2, Evaluation and Selection Report dated December 18, 2020.

11  
12 56. On December 22, 2020, the State issued a notification of intent to award a Contract  
13 pursuant to the RFP to GTL.

14 57. The next day, December 23, 2020, Securus sent a request pursuant to the California  
15 Public Records Act ("CPRA") to the State requesting documents regarding the RFP process. Securus  
16 sent another CPRA request seeking additional documents regarding the RFP process a few days later.

17 58. On December 28, 2020, the State executed a Contract with GTL which became  
18 effective on December 31, 2020.

19  
20 **C. GTL's Contract Violates California Law.**

21 59. On January 25, 2021, the State produced the first set of documents to Securus in  
22 response to its CPRA requests, but the response did not contain many documents regarding the RFP  
23 process and the evaluation of proposals received in response to the RFP.

24 60. Then on January 28, 2021, the State produced additional documents regarding the RFP  
25 process and the evaluation of proposals received in response to the RFP to Securus.

26 61. The State has still failed to produce all evaluation sheets for all the bidders, evaluation  
27 sheets for BAFOs, and has provided only a few responsive emails.  
28

1           62.    The State's limited document production still clearly demonstrates the impropriety of  
2 the State's award of a contract to GTL, that the award to GTL was arbitrary and capricious and that  
3 the State failed to honor the terms of its own RFP.

4           63.    In fact, these documents demonstrated that although the State should have rejected or  
5 disqualified GTL's proposal for failing to meet numerous RFP requirements, it did not and instead  
6 continued to negotiate with GTL. Also, these documents show the State's scoring of GTL and  
7 Securus was arbitrary, capricious, improper and not in accordance with the RFP.

9           1.    **The State Failed to Disqualify GTL for Exceeding the RFP's \$0.05 per Minute**  
10           **NTE Requirement.**

11           64.    Section 5 of the RFP made clear that the bidder's rates for all calls could not exceed  
12 \$0.05 per minute and during negotiations, the State confirmed to Securus that the RFP's NTE cap  
13 applied to all calls, inclusive of video calls and international calls.

14           65.    GTL failed to comply with the \$0.05 NTE and instead proposed charging a per minute  
15 video calling rate that is 500% over the NTE and a per minute international voice calling rate that is  
16 40% over the NTE.

17           66.    The State should have disqualified GTL because both its video calling rate (\$0.25 or  
18 \$0.20 per minute) and its international voice calling rate (\$0.07 per minute) fail to comply with the  
19 RFP's \$0.05 per minute NTE.

20           2.    **The State Granted GTL an Unfair Competitive Advantage Over Securus and**  
21           **Improperly Evaluated Cost.**

22           67.    In accordance with the RFP's form for submitting video calling rates, Securus  
23 proposed a *per transaction* rate for video calls that complied with the RFP's \$0.05 per minute NTE  
24 on the assumption that each video call would last 30 minutes.

25           68.    As such, Securus proposed a \$0.99 rate per video call transaction (i.e., \$0.99/30  
26 minutes = \$0.033 per minute).  
27  
28

1           69. It appears that the State calculated Securus' total video calling cost was \$1,332,000  
2 per year by multiplying Securus' video calling rate of \$0.99 *per transaction/call* against the  
3 anticipated annual amount of video *calls* - 1,800,000.

4           70. GTL proposed a per minute video calling rate of \$0.25 (which was at some point  
5 reduced to \$0.20 per minute although documentation denoting that change has not yet been  
6 provided).

7           71. The State did not disqualify GTL for not submitting a rate per video call transaction  
8 nor for exceeding the RFP's \$0.05 NTE.

9           72. Instead, it appears the State calculated GTL's total video calling cost was \$450,000  
10 per year by multiplying GTL's video calling rate of \$0.25 *per minute* (later reduced to \$0.20/min)  
11 against the anticipated annual amount of *calls* - 1,800,000. See Exhibit 8, GTL Cost Workbook

12           73. As a result, the State concluded GTL submitted the lowest cost and GTL received a  
13 perfect cost score of 600 points while Securus received a cost score of 284 points.

14           74. This scoring is invalid and inaccurate.

15           75. Had the State performed a like comparison of Securus and GTL's video calling rates  
16 on a per transaction basis, it would have determined that GTL's annual video calling cost will be  
17 approximately \$13,500,000 per year - i.e., \$0.25 per minute rate x 30 minutes per call x 1,800,000  
18 calls = \$13,500,000 per year.

19           76. In other words, because of the State's improper Cost evaluation and scoring,  
20 incarcerated individuals and their friends and families will be paying ***over \$12,000,000 more per year***  
21 ***for video calling than they would have under Securus.***

22           77. Moreover, had the State provided Securus with the same opportunity it provided GTL  
23 - to charge video calling rates that exceeded the NTE - Securus could have re-structured its cost offer  
24 during the BAFO to among other things, charge lower voice calling rates and higher video calling  
25 rates, and potentially receive more cost points.

1 78. In sum, the State's failure to disqualify GTL granted GTL an unfair competitive  
2 advantage and rendered its cost scoring arbitrary, capricious and improper, and inconsistent with the  
3 requirements of the State's own RFP.

4 **3. The State Failed to Disqualify GTL For Submitting False and Misleading**  
5 **References.**

6 79. In order for the State to determine if the bidders could comply with the RFP's  
7 requirements and if they were responsive and/or responsible, the RFP required the bidders to submit  
8 customer references:

9  
10 The Bidder must complete and submit as part of the proposal response, Exhibit 19.1:  
11 Bidder Qualification Form, to confirm that the Bidder's experience meets all the  
12 minimum requirements identified in Exhibit 19.1: Bidder Qualification Form. It is  
13 incumbent upon the Bidder to provide enough detail in Final Proposal for the state to  
14 evaluate the Bidder's ability to meet the requirements and perform the services as  
15 described in this solicitation.

16 \*\*\*\*\*

17 The purpose of the bidder reference requirement is to provide the State the ability to  
18 assess the bidder's experience in providing similar or relevant services to other  
19 organizations through a satisfaction rating provided by the bidder's previous project  
20 clients. The description of their projects must be detailed and comprehensive enough  
21 to permit the State to assess the similarity of those projects to the work anticipated for  
22 the Contract resulting from this solicitation. The CDCR cannot be used as a reference  
23 to satisfy this requirement.

24 Exhibit 1, RFP Parts 1 and 2 Addendum 2 at Sections 4.1.1 and 4.1.2, pages 74-75 of 230; see also id  
25 at Section 3.22.2, pages 69 of 230 ("The purpose of the customer reference requirement is to provide  
26 the State the ability to verify the claims made in the proposal by the Bidder.").

27 80. At a minimum, and as a mandatory requirement, the bidder had to submit references  
28 showing that it had "*Five (5) years of experience* providing Incarcerated individual communications  
29 services *with similar complexity to that outlined in this Statement for Work (SOW)*. Experience  
30 must be within the last eight (8) years." Exhibit 1, RFP Parts 1 and 2 Addendum 2 at Exhibit 19.1,  
31 pages at 169-70 of 230.

32 81. The RFP further provided that providers may meet this requirement by submitting at  
33 least two projects but no more than four projects:



1 The Bidder must provide information for a minimum of two (2) projects. A separate  
2 Exhibit 19.1: Bidder Qualification Form must be submitted for every project used to  
3 meet the minimum required experience. Any given project may meet multiple  
4 requirements, but at least two (2) projects and not more than four (4) projects must be  
5 provided to meet the requirements in Exhibit 19.1: Bidder Qualification Form. If more  
6 than four (4) Bidder Qualification Forms are submitted, only the first four (4) in the  
7 order presented in the proposal will be evaluated.

8 Exhibit 1, RFP Parts 1 and 2 Addendum 2 at Section 4.1.1, pages at 74 of 230.

9 82. The RFP provided that bidders could be rejected for providing false or misleading  
10 statements or non-applicable references:

11 Proposals which contain false or misleading statements, or which provide references  
12 that do not support an attribute or condition claimed by the bidder, may be rejected. If,  
13 in the opinion of the State, such information was intended to mislead the State in its  
14 evaluation of the proposal, and the attribute, condition, or capability is a requirement  
15 of this solicitation document, it will be the basis for rejection of the bidder's proposal.

16 Exhibit 1, RFP Parts 1 and 2 Addendum 2 at Section 2.4.11, pages at 49 of 230.

17 83. Additionally, if the reference submissions did not demonstrate the bidder had the  
18 requisite years of experience, the Bidder could be deemed non-responsive:

19 Note: It is the Bidder's responsibility to ensure that each minimum experience  
20 requirement is met in full and is addressed in the Bidder qualification forms in order  
21 for the State to determine compliance to the requirements. If the State cannot  
22 determine that the years of experience for each of the minimum experience  
23 requirements have been met, Bidder's proposal may be deemed non-responsive.

24 Exhibit 1, RFP Parts 1 and 2 Addendum 2 at Exhibit 19, pages at 168 of 230.

25 84. GTL provided the following four references: North Carolina DOC, South Carolina  
26 DOC, Los Angeles County and Maricopa County, Arizona.

27 85. The Statement of Work for this RFP includes incarcerated individual telephones,  
28 incarcerated individual tablets and video visitation. None of these references demonstrate that GTL  
has experience providing all such services at another jurisdiction that is "similar in complexity."

86. **North Carolina DOC**: The State recognized that the information GTL had supplied  
regarding North Carolina was not "clear as to what quantity and type of services were provided at  
each location" and requested GTL supply additional information regarding the services it provided to

1 North Carolina DOC. Exhibit 4, 10/30/20 Bid Clarification or Action Item Request. In response,  
2 GTL stated that it currently provides incarcerated individual telephones for North Carolina DOC, and  
3 “*is in the process of deploying* GTL’s advanced wireless network along with wireless tablets and  
4 kiosks for video visitation and offender services.” *Id.* (emphasis added). In other words, GTL  
5 admitted that it does not currently provide North Carolina DOC with tablets and video visitation.  
6

7 87. **South Carolina DOC:** GTL only provides South Carolina with incarcerated  
8 individual telephone services. It later entered a contract to provide tablets in December 2018 and has  
9 not completed roll-out of video visitation. Currently there is only one pilot location for video  
10 visitation. See <http://www.doc.sc.gov/family/visitation.html>. Even if a pilot can be deemed as  
11 experience of “similar complexity” as California (which is described clearly in the statement of work  
12 to include video, tablets, AND telephone services), at best GTL has only been providing tablets and  
13 video visitation to South Carolina for two years, though they claimed 5 years of experience.  
14

15 88. **Maricopa County, Arizona:** GTL entered a contract to provide tablets and video  
16 visitation to Maricopa County that was effective Dember 2019. See Exhibit 5. Even assuming the  
17 execution of a contract signified the start of providing services, at best, GTL only has one year of  
18 providing Maricopa County with services similar of “similar complexity” as contained in the RFP,  
19 though they claimed 5 years of experience.  
20

21 89. **Los Angeles County, California:** The State recognized that GTL’s “project  
22 description and/or description of services provided is insufficient to demonstrate similar complexity”  
23 and requested GTL provide additional information so the State could evaluate GTL’s ability to meet  
24 the requirements. Exhibit 4, 10/30/20 Bid Clarification or Action Item Request. In response, GTL  
25 admitted it only provides limited video visitation on a small scale and does not provide tablets, stating  
26 that it currently provides “kiosks for video visitation and video relay service as well as lobby kiosks  
27 for trust deposits.” *Id.*  
28

1           **4. The State Improperly Scored References and Minimum Qualifications.**

2           90. As explained above, none of the four references submitted by GTL show that it has the  
3 requisite experience demanded in the RFP of providing all three services.

4           91. Nor does the sum of experience, even if measured against contract start dates, meet the  
5 minimum required by the RFP's Statement of Work - incarcerated individual telephones, incarcerated  
6 individual tablets and video visitation for five years.

7           92. As such, GTL's proposal should have again been rejected.

8           93. However, the State scored GTL as providing all three services to North Carolina for  
9 five years, as providing all three services to South Carolina for five years, as providing all three  
10 services to Maricopa County for five years, and as providing two out of three services to Los Angeles  
11 County. See Exhibit 6, GTL reference scoring worksheets.

12           94. As a result, GTL received 24 points for its references, and 16 points for experience,  
13 when in fact they did not meet the minimum qualifications to bid as outlined by the RFP.

14           95. This scoring violates the principles of the issued RFP and contradicts the State's own  
15 commentary to GTL.

16           **D. The State Refuses to Set Aside its Illegal Award.**

17           96. On February 3, 2021, Securus representatives had a debriefing conference with Katie  
18 DeAngelis (CDCR Procurement) and David Sanchez (CDCR Procurement) as provided under the  
19 RFP to obtain additional insight into the procurement process. Securus attempted to raise the above-  
20 described issues with the State without having to take formal legal action as the RFP provides for no  
21 other protest process.

22           97. During the debriefing conference, the State confirmed what it told Securus during  
23 negotiations - that the \$0.05 per minute NTE applied to video calls and that Securus should submit its  
24 proposed video calling rate as the RFP requested *per minute* despite the RFP form's request for a per  
25 transaction (i.e., per video call) rate.  
26  
27  
28

1 98. During the debriefing conference, Securus informed the State that the documents the  
2 State had produced demonstrated that GTL's proposed video calling rate was over 500% the NTE  
3 rate, and GTL's proposed international rate was 40% over the NTE rate.

4 99. Securus also noted for the State that had it properly evaluated GTL's video calling  
5 rates as per the stated terms of the RFP, it would have determined that GTL's annual video calling  
6 cost will be approximately \$13,500,000 per year (i.e., \$0.25 per minute rate x 30 minutes per call x  
7 1,800,000 calls = \$13,500,000 per year).

8 100. The State declined to respond or discuss these issues in the debriefing and directed  
9 Securus to file this Petition for a Writ, but thanked Securus for bringing this "**potentially serious**  
10 **issue to their attention**".

11 101. As per the State's direction during the debriefing, Securus is filing this Petition to  
12 address these issues.

13 **FIRST CAUSE OF ACTION**  
14 (Writ of Mandate Against the State)

15 102. Petitioner restates and incorporates by reference all of the foregoing paragraphs of this  
16 Petition as if fully set forth herein.

17 103. Petitioner was substantially prejudiced, injured and adversely impacted by the State's  
18 violation of public purchasing laws in that (a) the State arbitrarily and capriciously failed to follow  
19 California law and its own RFP requirements during the bid selection and negotiation process and (b)  
20 the State arbitrarily and capriciously failed to reject GTL's bid once it became clear that GTL's bid  
21 lacked the evidentiary support to meet the RFP's requirements to qualify as a responsive and  
22 responsible bidder. These failures deprived State taxpayers from obtaining the full benefit of the bid  
23 process and obtain the bidder with the most value effective solution.

24 104. Pursuant to California law, the State owes its taxpayers a bidding process that  
25 complies with California law and obtains the most value effective solution.  
26

1 105. Petitioner lacks a plain and speedy remedy other than a Writ of Mandate since the  
2 award of the Contract is unique and the State has improperly refused to strictly comply with  
3 California law. The Contract has been executed by GTL and the State and any delay in obtaining  
4 relief will result in the Contract being performed by a bidder illegally awarded the Contract. As such,  
5 Petitioner and the taxpayers of the State will be deprived of the most advantageous Contract and the  
6 one with the most value effective solution.  
7

8 106. The State also violated the underlying purpose of the public bidding process by  
9 introducing uncertainty and haphazard guesswork into a bidding contractor's determination. In view  
10 of the State's determinations, bidders could not submit meaningful bids.  
11

12 107. Petitioner brings this Petition with all due urgency because the State has already  
13 awarded and signed the Contract with GTL at rates that exceed the NTE requirements of the RFP.

14 108. The Contract is illegal, and null and void because, GTL was a non-responsive and/or  
15 non-responsible bidder who cannot provide the State with the contractually mandated products and  
16 services at or below the prices to end users required by the RFP itself.  
17

18 **SECOND CAUSE OF ACTION**

19 (Injunction Against the State)

20 109. Petitioner restates and incorporates by reference all of the foregoing paragraphs of this  
21 Petition as if fully set forth herein.

22 110. California's public contracting laws and regulations are designed to invite and ensure  
23 fair and open competition, guard against favoritism, improvidence, fraud and corruption.

24 111. Under California law, the public bidding process must be open, honest and unbiased.

25 112. As described above, the award of the Contract to GTL was contrary to California law  
26 and arbitrary and capricious and/or an abuse of discretion.

27 113. Awarding the Contract to GTL is not in the best interest of the State nor is it the most  
28 advantageous to the State.

1           114. The award of the Contract to GTL seriously undermines the integrity of the public  
2 contracting system.

3           115. These improprieties and discrepancies have been brought to the attention of the State  
4 but it has failed to take action to address them.

5           116. Upon information and belief, the State is moving forward with the implementation of  
6 the Contract to GTL.

7           117. Petitioner has been substantially prejudiced and aggrieved by the State's award of the  
8 Contract to GTL.

9           118. Without Petitioner's action, the State's actions would go unchallenged, harming the  
10 taxpayers and undermining the integrity of the public contracting process.

11           119. Petitioner is an aggrieved bidder in the RFP process and has a substantial interest in  
12 the State awarding public contracts to bidders without the award being arbitrary, capricious, an abuse  
13 of discretion, or otherwise not in accordance with law.

14           120. If the Court does not enter an injunction, there will be significant and irreparable harm  
15 to the Petitioner and taxpayers of California and the competitive procurement process as set forth  
16 above and there is no fully adequate remedy at law.

17           121. On the other hand, if the Court does enter an injunction, there will be no harm to the  
18 State because the State will continue to receive incarcerated individual telephone service from GTL.

19           122. Petitioner is likely to prevail on the merits of the claims herein.

20           123. Any possible harm to Respondents by granting a preliminary and permanent  
21 injunction would be outweighed by the harm suffered to Petitioner and the taxpayers of California if  
22 no injunction were granted.

23           124. An injunction would not adversely affect the public interest but instead would protect  
24 the public interest.

25           125. The Petitioner's right to relief is clear.

- 1            126.    Petitioner has no adequate remedies at law.
- 2            127.    Petitioner's injuries cannot be compensated by an award of damages.
- 3            128.    Redress through other channels is unavailable.
- 4            129.    If the award of the Contract to GTL is not overturned now, it will be so later, which
- 5 will cause unnecessary expense and delay.
- 6

**THIRD CAUSE OF ACTION**

(Declaratory Judgment Against the State)

9            130.    Petitioner restates and incorporates by reference all of the foregoing paragraphs of this  
10 Petition as if fully set forth herein.

11            131.    The State's award of the Contract to GTL is illegal in that it contravenes California  
12 law, including California public bidding laws.

13            132.    The award of the Contract to GTL is also arbitrary and capricious and an abuse of  
14 discretion for the reasons identified herein.

15            133.    An actual controversy presently exists between the Petitioner, on the one hand, and the  
16 Respondents, on the other hand, with respect to the award of the Contract in that Petitioner contends  
17 and the Respondents deny that the award of the Contract to GTL is illegal, arbitrary and capricious.

18            134.    Petitioner and Respondents have a direct and immediate interest in the award of the  
19 Contract to GTL.  
20

**PRAAYER FOR RELIEF**

21            WHEREFORE, Petitioner prays for judgment as follows:

- 22            (1)    On the First Cause of Action for Writ of Mandate Against the State, a writ of mandate
- 23 directing the State: (a) to rescind the Contract it entered into with GTL; and (b) award the Contract to
- 24 Securus as the highest scoring responsible and responsible bidder, or conduct a re-bid in full
- 25 compliance with California law.
- 26
- 27
- 28

1 (2) On the Second Cause of Action for Injunction Against the State, an order that: (a)  
2 preliminarily and permanently enjoins the State from awarding the Contract to GTL; (b) requires the  
3 State to rescind the Contract it entered into with GTL; and (c) award the Contract to Securus as the  
4 highest scoring responsible and responsible bidder, or conduct a re-bid in full compliance with  
5 California law.  
6

7 (3) On the Third Cause of Action for Declaratory Judgment Against the State, an order  
8 declaring that: (a) the State's award of the Contract to GTL is illegal and null and void; (b) any  
9 Contract with GTL is illegal, null and void; and (c) the State must award the Contract to Securus as  
10 the highest scoring responsible and responsible bidder, or conduct a re-bid in full compliance with  
11 California law;  
12

13 (4) Petitioner's reasonable attorneys' fees as permitted under law;

14 (5) Costs of suit; and

15 (6) Such other relief as the Court deems just and proper.  
16

17 K&L GATES LLP

18  
19 Dated: February 11, 2021

By: 

Timothy L. Pierce  
Hector H. Espinosa

Attorneys for Petitioner  
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VERIFICATION

(Case No. )

STATE OF TEXAS        }  
COUNTY OF DENTON    }

I have read the forgoing PETITION FOR WRIT OF MANDATE filed by Securus Technologies, LLC and know its contents.

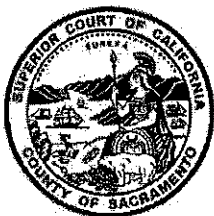
I am Sales Vice President of Securus Technologies, LLC, the Petitioner in this proceeding, and I am authorized to make this verification for and on its behalf. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on this 11<sup>th</sup> day of February, 2021 at 2:32 PM

Joshua Conklin  
Type or Print Name

[Signature]  
Signature



**SUPERIOR COURT OF CALIFORNIA**  
**County of Sacramento**  
720 Ninth Street ~ Room 102  
Sacramento, CA 95814-1380  
(916) 874-5522 — Website [www.saccourt.com](http://www.saccourt.com)

**GUIDE TO THE PROCEDURES FOR PROSECUTING PETITIONS  
FOR PREROGATIVE WRITS  
(as specified in Local Rule 2.26(E))**

This guide to the procedures for prosecuting petitions for writs of mandate and other prerogative writs in the Sacramento Superior Court is made available for your general information pursuant to Local Rule 2.26(E). A protocol for each department to which writs are assigned (hereinafter "assigned writ department") supplements these procedures with respect to the filing of documents, the scheduling of hearings, and the use of tentative rulings. The protocol is available from the assigned writ department and on the "Civil" page of the court's website under [Prerogative Writ Departments and Protocol](#).

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### Filing a Writ Petition:

Step	Action
1.	File an original and two copies of the petition and a civil case cover sheet at the civil front counter in Room 102 on the first floor of the main courthouse. <i>Or</i> mail an original and two copies of the petition and a civil case cover sheet to the Civil Division - Room 102, 720 9th Street, Sacramento, CA 95814.
2.	Pay the filing fee pursuant to Government Code section 70611 in Room 102.
3.	Receive from the civil front counter clerk a Notice of Case Assignment and a copy of this Guide to the Procedures for Prosecuting Petitions for Prerogative Writs.

### Serving a Writ Petition:

Step	Action
1.	Serve the writ petition on respondent(s) and real party(ies) in compliance with the requirements of Code of Civil Procedure (CCP) sections 1107 and 1088.5. Until compliance with these statutory service requirements is established by the filing of an appropriate proof of service, the court cannot hear or act on the petition.
2.	Along with the writ petition, serve copies of the Notice of Case Assignment and this Guide to the Procedures for Prosecuting Petitions for Prerogative Writs.

For service of an application for an alternative writ, see below, "Setting a Hearing on the Merits of a Writ Petition, (2) Securing issuance of an alternative writ."

### Filing Subsequent Documents:

Step	Action
1.	File an original and two copies of all subsequent documents related to the writ petition either at the civil front counter in Room 102 or by mail addressed to the Civil Division - Room 102, 720 9th Street, Sacramento, CA 95814. <i>Exception:</i> Documents filed one day before or on the day of the hearing shall be filed with the courtroom clerk in the assigned writ department after any applicable fees have been paid in Room 102.
2.	File documents by fax in compliance with rule 2.303 of the California Rules of Court. Documents faxed directly to the court <b>will not be filed</b> .
3.	Specify on the first page of each document the date, time and department of any scheduled hearing to which the document applies. To set a hearing, see below, "Bringing Motions before the Hearing on the Merits of a Writ Petition" and "Setting a Hearing on the Merits of a Writ Petition."



**Noticing Related  
Writ Cases and  
Possible Consolidation:**

<b>Step</b>	<b>Action</b>
1.	When filing a Notice of Related Case pursuant to rule 3.300(d) of the California Rules of Court regarding two or more writ cases assigned to different judges in this court, file the Notice <b>in each writ case</b> .
2.	When filing a Response to a Notice of Related Case pursuant to rule 3.300(g) of the California Rules of Court, file the Response <b>in each writ case</b> .
3.	Serve the Notice or Response on <b>each party to each case</b> .

Note that the court proceeds with respect to related writ cases under rule 3.300(h)(1) of the California Rules of Court (CRC) as follows:

- The judges assigned to civil writ cases listed in a Notice Of Related Case filed and served pursuant to CRC 3.300(d) identify which one of them is assigned to the earliest filed case, information which should be included in the Notice of Related Case pursuant to CRC 3.300(c)(2). That judge proceeds under CRC 3.300(h)(1)(A) to determine whether the cases are related within the meaning of CRC 3.300(a).
- If the judge assigned to the earliest filed case determines that the cases are related, the judge orders the cases related and assigned to his or her department. That order is filed in each of the related cases and served on the parties to each of the related cases pursuant to CRC 3.300(i). In addition, an Amended Notice of Case Assignment, reassigning to the judge each of the related cases not previously assigned to him or her, is filed and served upon all parties to each reassigned case. Courtesy copies of the order and Amended Notice(s) of Case Assignment are sent to the judges previously assigned to any of the related cases.
- If the judge assigned to the earliest filed case determines that the cases are not related within the meaning of CRC 3.300(a), the judge issues a minute order stating and briefly explaining the determination. This minute order is filed in each of the cases listed in the Notice of Related Case and is served on all parties to the listed cases pursuant to CRC 3.300(i).
- In response to an order determining that the cases are not related, any party to any of the cases listed in the Notice of Related Case may file a motion pursuant to CRC 3.300(h)(1)(D) to have the cases related. The motion must be filed with the Presiding judge or a judge designated by the Presiding Judge.



**Applying for a  
Temporary Stay in  
Administrative Mandate  
Proceedings (CCP § 1094.5 (g) or (h)):**

Step	Action
1.	<p>Prepare an ex parte application for an order temporarily staying operation of the administrative decision under review in the proceeding. Identify whether the temporary stay order is requested pursuant to subdivision (g) or (h) of the CCP § 1094.5. Specify "Ex Parte" in the title of the application.</p> <p>Pursuant to rules 3.1201 and 3.1202 of the California Rules of Court and this Guide to the Procedures for Prosecuting Petitions for Prerogative Writs, an ex parte application for a stay order includes the following supporting documents and papers:</p> <ul style="list-style-type: none"><li>▪ Endorsed copy of the petition.</li><li>▪ Points and authorities, declarations and other supporting documents, including relevant portions of the administrative record if available.</li><li>▪ Proposed order to show cause why the administrative decision under review in the proceeding should not be temporarily stayed pending a hearing on the merits of the writ petition (OSC). This proposed OSC should contain:<ul style="list-style-type: none"><li>- blank spaces for the date and time of the hearing on the OSC,</li><li>- an order for service of the OSC and any supporting papers not previously served with a blank space for a date of service prior to the hearing on the OSC, and</li><li>- an order staying the administrative decision pending the hearing on the OSC.</li></ul></li><li>▪ Proposed stay order.</li><li>▪ Notice of hearing on the petition with blank spaces for date and time (unless the stay is being requested in conjunction with an application for an alternative writ).</li><li>▪ Declaration regarding notice, as specified in rule 3.1204.</li></ul> <p>In addition, CCP § 1094.5 (g) and (h) require that proof of service of a copy of the application on the respondent accompany an application for a stay. See subdivisions (g) and (h) for required manner of service.</p>
2.	<p>Contact the assigned writ department to reserve an ex parte hearing date and time and to determine whether the assigned writ department requires any of the documents or papers listed above in Step 1 to be filed before the hearing. Note that some writ departments hear writ matters only on Fridays.</p>
3.	<p>Notify respondent(s) and real party(ies) of the hearing on the ex parte stay application in accordance with rule 3.1203 of the California Rules of Court. Include the details of this notification in the declaration regarding notice prepared pursuant to rule 3.1204.</p> <p><b>Note:</b> The Court prefers at least 48 hours' notice but, upon a showing of urgency, will accept less notice.</p>
4.	<p>If the assigned writ department does not require any of the documents listed above in Step 1 to be filed before the ex parte hearing, file and serve the documents and papers as soon as possible and no later than the time of the hearing. (See rule 3.1206 of the California Rules of Court.)</p>



At the ex parte hearing, depending on the nature of the factual and legal issues raised by the stay application and the practical exigencies of the matter, the court will either rule on the stay application immediately or issue the proposed OSC with or without a temporary stay order pending the hearing on the OSC at a specified date and time.

If the court grants a stay at the ex parte hearing or the hearing on the OSC, the court will sign and file the proposed stay order and set a date and time for a hearing on the merits of the petition. The court clerk will record the hearing date and time in the notice of hearing on the petition, or if the court has ordered the issuance of an alternative writ, in the alternative writ.

If the Court denies a stay at the ex parte hearing or the hearing on the OSC, the court, upon petitioner's request, will set a date and time for a hearing on the merits of the petition. The clerk will record the hearing date and time in the notice of hearing on the petition, or if the court has ordered the issuance of an alternative writ, in the alternative writ.

**Applying for a  
Temporary Stay  
in Traditional Mandate  
Proceedings (CCP § 1085):**

Step	Action
1.	Follow the statutory and regulatory provisions for obtaining a temporary restraining order (TRO), an order to show cause why a preliminary injunction should not be issued (OSC), and/or a preliminary injunction, set forth in the Code of Civil Procedure (including but not limited to CCP §§ 525, 526, 527, 528 and 529) and rule 3.1150 of the California Rules of Court. These provisions constitute rules of practice for temporary stays in mandate proceedings brought under CCP § 1085 in the absence of temporary stay provisions specific to such mandate proceedings. (See CCP § 1109.)
2.	When following the statutory and regulatory procedures for obtaining a TRO and/or an OSC, comply with the ex parte procedures outlined above in "Applying for a Temporary Stay in Administrative Mandate Proceedings" and in rule 3.1201 et seq. of the California Rules of Court.
3.	If no TRO or OSC is sought, notice a motion for a preliminary injunction following the procedures set forth below in "Bringing Motions Before the Hearing on the Merits

Note that a temporary stay in proceedings on a petition for a writ of prohibition may be obtained by following the procedures set forth below under "Setting a Hearing on the Merits of a Petition, (2) Securing issuance of alternative writ." An alternative writ of prohibition, unlike an alternative writ of mandate, stays specified action by the respondent until further order of the court. (See CCP §§ 1087, 1104.)



**Bringing Motions before  
The Hearing on the  
Merits of a Writ Petition:**

Motions on the pleadings and other pretrial matters brought in civil actions -- including motions for change of venue, demurrers, motions to strike, motions to dismiss, discovery motions, and motions for summary judgment -- may generally be brought in writ proceedings. (See CCP § 1109.)

Motions addressing the merits of the petition in whole or in part should be calendared for a hearing at the same time as the hearing on the merits. Motions directed at resolving issues preliminary to and distinct from the issues related to the merits of the petition, such as untimeliness of the petition under an applicable statute of limitations, should be calendared before the hearing on the merits of a writ petition. The court, in the exercise of its discretion to control the order of litigation before it, may advance the hearing on a motion to a date before the hearing on the merits or may postpone a motion to the hearing on the merits when such advancement or postponement will promote the efficient conduct and disposition of the proceeding.

Because a writ petition is usually disposed of by a hearing on the merits which is limited to oral argument on written briefs and documentary evidence, the usefulness of a motion for summary judgment or summary adjudication in economically disposing of an unmeritorious case or claim is substantially reduced in writ proceedings. Thus, before bringing a motion for summary judgment or summary adjudication, counsel should carefully evaluate whether the purpose of the motion can be achieved more directly and completely through a hearing on the merits of the petition.

Step	Action
1.	Contact the assigned writ department to reserve a date and time available on the department's calendar for a hearing on the motion. Prior to reserving a date, contact the other parties to the writ petition and determine their availability on the date. Some assigned writ departments hear writ matters only on Fridays.
2.	Notice the motion in accordance with the civil law and motion procedures in CCP § 1005 and in compliance with the California Rules of Court, including rules 3.1110 through 3.1113, 3.1115, 3.1116, 3.1300, and 3.1320 through 3.1324. Comply with the page limits for memoranda set forth in rule 3.1113.  If the assigned writ department uses the tentative ruling system, the notice of motion must contain tentative ruling language available from the department.



**Setting a Hearing  
on the Merits of a  
Writ Petition:**

If a hearing on the merits of a writ petition has not been set in conjunction with an ex parte hearing on an application for a temporary stay, it may be set either by (1) noticing a hearing on the petition or (2) securing issuance of an alternative writ. **Note:** The court prefers, as more efficient and economical for both itself and the parties, the procedure of noticing a hearing on the petition.

The date set for a hearing on the merits of a writ petition, whether by notice or alternative writ, should allow the parties to file briefs in accordance with the following schedule established in Local Rule 2.26(D):

Opening brief:	Due 45 days before the hearing
Opposition brief:	Due 25 days before the hearing
Reply brief:	Due 15 days before the hearing

Note that Local Rule 2.26(D) limits the length of opening and opposition briefs to 30 pages and reply briefs to 20 pages instead of the page limits in rule 3.1113 of the California Rules of Court.

The date of the hearing on the merits may be expedited and the briefing schedule shortened upon an application setting forth circumstances warranting an expedited hearing. The application for an expedited hearing may be made orally at a hearing for a temporary stay or alternative writ or on an ex parte basis in accordance with rules 3.1201 through 3.1206 of the California Rules of Court.

**(1) Noticing a hearing on a writ petition**

Step	Action
1.	Contact the assigned writ department to reserve an available date and time for a hearing on the writ petition. Prior to reserving a date, contact the other parties to the writ petition and determine their availability on the date. Writ petitions are normally heard on Fridays.
2.	Prepare and file a notice of hearing on the writ petition specifying the reserved hearing date and time. If the assigned writ department uses the tentative ruling system, the notice of hearing must contain tentative ruling language available from the department.
3.	File the notice of hearing either at the civil front counter in Room 102 or by mail addressed to the Civil Division - Room 102, 720 9th Street, Sacramento, CA 95814.
4.	Serve a copy of the notice of hearing on respondent(s) and real party(ies) no later than the time allowed for filing and serving the opening brief. If not previously served, the writ petition, the Notice of Assignment, and this Guide should also be served no later than the time for filing and serving the opening brief.





## (2) Securing issuance of an alternative writ

The alternative writ is an order to show cause that calendars a writ petition for a hearing on the merits. With the exception of an alternative writ of prohibition issued pursuant to CCP § 1104, the alternative writ does not, in and of itself, accomplish a stay or afford any affirmative relief.

Note that, with the alternative writ method, two writs may be issued in the proceeding. First, the alternative writ is issued to set a hearing on the merits of the petition. Second, a peremptory writ may issue after the hearing on the merits.

Step	Action
1.	<p>Prepare an ex parte application for an alternative writ. Specify "Ex Parte" in the title of the application.</p> <p>As provided in rules 3.1201 and 3.1202 of the California Rules of Court and this Guide, an ex parte application for an alternative writ includes the following supporting documents and papers:</p> <ul style="list-style-type: none"><li>▪ Endorsed copy of the petition.</li><li>▪ Points and authorities and any other supporting documents.</li><li>▪ Proposed order directing issuance of alternative writ.</li><li>▪ Proposed alternative writ with blank spaces for the date and time of a hearing on the petition. (Include a signature block for the clerk, not the judge.)</li><li>▪ Declaration regarding notice, as specified in rule 3.1204.</li></ul>
2.	<p>Contact the assigned writ department to reserve an available date and time for an ex parte hearing on the application for an alternative writ and to determine whether the department requires the papers listed above in Step 1 to be filed before the hearing.</p> <p>Note that some writ departments hear writ matters only on Fridays. Also note that, absent a showing of good cause or waiver by the respondent(s) and real party(ies), some departments will not issue an alternative writ unless the writ petition and application for the alternative writ have been served on respondent(s) and real party(ies) at least five days before the ex parte hearing. (See CCP § 1088, requiring service of copy of petition in conjunction with application for alternative writ; CCP § 1107, providing a five-day period for respondent(s) and real party(ies) to respond to a writ petition after receiving service of the petition.)</p>
3.	<p>Notify the respondent(s) and real party(ies) of the date and time of the ex parte hearing on the alternative writ pursuant to rule 3.1203 of the California Rules of Court. Include the details of this notification in the declaration regarding notice pursuant to rule 3.1204.</p> <p><b>Note:</b> The Court prefers at least 48 hours' notice but, upon a showing of urgency, will accept less notice.</p>
4.	<p>If the assigned writ department does not require any of the documents listed above in Step 1 to be filed before the hearing, file and serve on all parties the documents and papers as soon as possible and no later than the time of the hearing.</p>



If the court grants the application for an alternative writ, the court signs and files the proposed order directing issuance of the alternative writ that sets the petition for a hearing on the merits. The clerk then issues the proposed alternative writ with the date and time of the hearing and provides it to the petitioner after the petitioner has paid the issuance fee in Room 102. The writ must be served upon respondent(s) and real party(ies) in the same manner as a summons in a civil action unless the court expressly orders otherwise. (See CCP §§ 1073, 1096.) Once served, the writ must be filed with a proof of service.

### Applying for a Continuance:

After a hearing has been set on a motion or on the merits of a petition, it may be continued only upon approval of the Court. If the continuance requires a change in the briefing schedule, such change must also be approved.

Step	Action
1.	<p>Present a telephone request for a continuance of the hearing to the clerk in the assigned writ department, including the reason(s) for the continuance and any necessary changes in the briefing schedule. Present the request as far in advance of the scheduled hearing date as possible.</p> <p>Upon the court's approval, the clerk will provide available dates on the court's calendar to which the hearing may be continued.</p>
2.	<p>Promptly confer with all counsel to agree upon a mutually convenient hearing date from among the dates provided by the clerk and any necessary changes in the briefing schedule.</p> <p>If counsel cannot agree to a continuance, a new hearing date and/or changes in the briefing schedule, the party seeking the continuance may apply for a continuance by noticed motion.</p>
3.	<p>Promptly present to the court a stipulation signed by all parties, including the reason for the continuance, the agreed upon hearing date and any agreed upon changes in the briefing schedule, with a proposed order.</p> <p>Pay the filing fee for the stipulation pursuant to subdivision (c) of Government Code section 70617 in Room 102.</p>
4.	<p>When the stipulation and order has been signed and filed by the Court, serve the stipulation and order on all parties.</p>

Note that these procedures do not apply when a motion is dropped from the calendar by the moving party. In such circumstances, the moving party must telephonically notify the court and all other parties as far as possible in advance of the date on which the motion is to be heard and send a confirming letter to the court with copies to the other parties.



### Dismissing a Writ Petition:

Step	Action
1.	Promptly notify the assigned writ department pursuant to rule 3.1385 of the California Rules of Court when a writ proceeding is settled or otherwise disposed of.
2.	File a dismissal of the writ proceeding in the assigned writ department within 45 days after the date of the settlement pursuant to rule 3.1385(b) or after the date specified in the notice of conditional settlement pursuant to rule 3.1385(c).

### Lodging an Administrative Record:

Step	Action
1.	When securing a date and time for a hearing on the merits of the petition, inform the clerk in the assigned writ department about the size of any administrative record in the case. Determine the department's preferences regarding the format, binding and container for the administrative record.
2.	Lodge the administrative record with the assigned writ department no later than 25 days prior to the hearing on the merits of a writ petition. If the record is not lodged by this time, some assigned writ departments may take the matter off calendar.  Consult with the assigned writ department if you wish to lodge the administrative record more than 25 days before the hearing on the merits of a writ petition.
3.	Attach a cover sheet to the administrative record and any boxes containing the record that lists the: <ul style="list-style-type: none"><li>• Case name,</li><li>• Case number,</li><li>• Date and time of the hearing.</li></ul>

At the hearing on the merits of the petition, the court will mark the administrative record as an exhibit and admit it into evidence. At the conclusion of the proceedings on the petition, the court may return the administrative record to the party who lodged it or destroy it pursuant to CCP § 1952 through 1952.3 and subdivision (i) of CCP § 1094.5.

### The Hearing on the Merits:

All hearings on writ petitions proceed by way of oral argument. If a party wishes to present oral testimony at the hearing, the party must obtain permission pursuant to rule 3.1306 of the California Rules of Court.



If the assigned writ department uses a tentative ruling system and posts a tentative ruling on the court day before the hearing on the writ petition, a party desiring to be heard must contact the clerk and request oral argument by the time designated in the posted tentative ruling. When requesting oral argument, the party must advise the clerk that all other parties have been notified.

**Appearing by  
Telephone:**

Parties may appear by telephone in accordance with Local Rule 2.04.

Note that some assigned writ departments permit telephonic appearances in hearings on motions only on a limited basis and in hearings on the merits of a writ petition only under compelling circumstances.

**Preparing a  
Judgment and  
Peremptory Writ:**

**If the court denies the writ petition,** the party designated by the court shall, pursuant to rule 3.1312 of the California Rules of Court, prepare, serve on all parties, and present to the court a judgment denying the petition.

**If the court grants the writ petition:**

Step	Action
1.	The party designated by the court prepares (1) a judgment granting the writ petition and (2) a peremptory writ. The peremptory writ includes a signature block for the clerk, not the judge.
2.	Pursuant to rule 3.1312 of the California Rules of Court, prepare, serve on all parties, and present to the court a judgment granting the petition and the peremptory writ. The judgment, when approved, will be signed by the court. The clerk will issue the peremptory writ and provide it to the petitioner for service upon respondent(s) and real party(ies) after the petitioner pays the issuance fee in Room 102.
3.	Serve a copy of both the judgment granting the writ petition and the peremptory writ on the respondent(s) and real party(ies). The writ must be served in the same manner as summons in a civil action. (CCP §§ 1073, 1096, 1107.)
4.	Return the original peremptory writ with a proof of service to the assigned writ department for filing.
5.	Prepare, serve, and file in the assigned writ department a notice of entry of judgment pursuant to CCP § 664.5(a).



**SUPERIOR COURT OF CALIFORNIA**  
**County of Sacramento**  
**720 Ninth Street Room 102**  
**Sacramento, CA 95814-1380**  
**(916) 874-5522**  
**www.saccourt.ca.gov**

**NOTICE OF CASE ASSIGNMENT**  
**Proceeding for Writ of Mandate and/or Prohibition**

Case Number : 34-2021-80003594-CU-WM-GDS

This case has been assigned for all purposes to the judicial officer indicated below pursuant to rule 3.734 of the California Rules of Court and Sacramento Superior Court Local Rule 2.01; it is exempt from the requirements of the Trial Court Delay Reduction Act and the Case Management Program under Chapter 11 of the Sacramento Superior Court Local Rules.

JUDGE	COURT LOCATION	DEPT.
James P. Arguelles	Gordon D. Schaber Courthouse	17

The petitioner shall serve all parties with a copy of this order and a copy of the Sacramento Superior Court Guide to the Procedures for Prosecuting Petitions for Prerogative Writs. The Guide is available in Room 102 of the courthouse, from the clerk of the department to which this matter has been assigned, and on the "Civil" page of the Sacramento Superior Court internet website ([www.saccourt.ca.gov](http://www.saccourt.ca.gov)).

**Scheduling**

Contact the clerk in the assigned department to schedule any judicial proceedings in this matter, including hearings on ex parte applications and noticed motions.

JUDGE	DEPT.	PHONE
Hon. James P. Arguelles	17	(916) 874-5511
Hon. Steven M. Gevercer	27	(916) 874-6697
Hon. Shelleyanne W.L. Chang	21	(916) 874-5924
Hon. Laurie M. Earl	23	(916) 874-5754

**Other Information**

Pursuant to Local Rule 2.01, all documents submitted for filing in this case shall be filed in person at the Civil Front Counter (Room 102) or by mail addressed to the Clerk of the Sacramento Superior Court, Attn: Civil Division-Room 102, with the exception of certain documents filed on the day of the hearing. For specific requirements, please see the Sacramento Superior Court Guide to the Procedures for Prosecuting Petitions for Prerogative Writs.

Any administrative record must be lodged with the assigned department.

Date: 02/16/2021

Signed: /s/ I. Romo  
 I. Romo, Deputy Clerk



# SUPERIOR COURT OF CALIFORNIA

COUNTY OF SACRAMENTO

Superior Court of California, County of Sacramento

720 Ninth Street  
Sacramento, CA 95814-1311

## PAYMENT RECEIPT

Receipt #: 1063748

Clerk ID: iromo2

Transaction No: 2235947

Transaction Date: 02/16/2021

Transaction Time: 11:54:57 AM

Case Number	Fee Type	Qty	Fee Amount \$	Balance Due	Amount Paid	Remaining Balance
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34-2021-80003594-CU-WM-GDS	194 - Complaint or other 1st paper	1	\$435.00	\$435.00	\$435.00	\$0.00
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Sales Tax: \$0.00

**Total:** \$435.00 **Total Rem. Bal:** \$0.00

Check Number(s): 113643

Check: \$435.00

Total Amount Tendered: \$435.00

Change Due: \$0.00

Balance: \$0.00

**ORIGINAL**