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**FILED**  
Clerk of the Superior Court

AUG 20 2020

By: T. Abas

7 Attorneys for Real Party in Interest MARA ELLIOTT  
8

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 FOR THE COUNTY OF SAN DIEGO  
11 UNLIMITED JURISDICTION

<p>12 CORY J. BRIGGS, 13 14 Petitioner, 15 16 v. 17 ELIZABETH MALAND, as City Clerk of the City of San Diego; MICHAEL VU, as 18 Registrar of Voters of the County of San Diego; and DOES 11 through 100, 19 20 Respondents.</p>	<p>Case No. 37-2020-00028168-CU-WM-CTL  <b>STIPULATION RE: ISSUANCE OF PERMANENT INJUNCTION; [PROPOSED] ORDER</b></p>
<p>21 MARA ELLIOTT; and DOES 101 through 22 1000, 23 24 Real Parties in Interest.</p>	

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28 Stipulation re: Issuance of Permanent Injunction; [Proposed] Order

1 IT IS HEREBY STIPULATED, by and between Petitioner CORY J. BRIGGS ("Briggs")  
2 and Real Party in Interest MARA ELLIOTT ("Elliott"), by and through their respective attorneys  
3 of record, that good cause exists for the issuance of a permanent injunction:

4 (1) ordering Respondent ELIZABETH MALAND ("Maland") to replace Elliott's original  
5 Candidate's Statement of Qualifications (a true and correct copy of which is attached hereto as  
6 Exhibit 1 and incorporated herein by this reference) with Elliott's amended Candidate's  
7 Statement of Qualifications (a true and correct copy of which is attached hereto as Exhibit 2 and  
8 incorporated herein by this reference), and

9 (2) ordering Maland to provide Exhibit 2 to Respondent MICHAEL VU ("Vu"), so that  
10 Exhibit 2, instead of Exhibit 1, will appear in the voter information pamphlet in advance of the  
11 November 3, 2020 San Diego municipal election.

12 IT IS FURTHER STIPULATED between Briggs and Elliott that the replacement of  
13 Exhibit 1 with Exhibit 2 fully resolves Briggs's concerns regarding Elliott's Candidate's  
14 Statement of Qualifications and that Briggs will not raise any other legal challenges to Elliott's  
15 Candidate's Statement of Qualifications.

16 IT IS FURTHER STIPULATED, by and between Briggs, Elliott, Maland, and Vu, by and  
17 through their respective attorneys of record, that upon order of the Court:

18 (1) Maland will replace Elliott's original Candidate's Statement of Qualifications  
19 (Exhibit 1) with Elliott's amended Candidate's Statement of Qualifications (Exhibit 2);

20 (2) Maland will provide Elliott's amended Candidate's Statement of Qualifications  
21 (Exhibit 2) to Vu; and

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24 ///

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28 Stipulation re: Issuance of Permanent Injunction; [Proposed] Order

1 (3) Vu will cause Exhibit 2, instead of Exhibit 1, to be published in the voter information  
2 pamphlet in advance of the November 3, 2020 San Diego municipal election.

3  
4 Dated: August \_\_\_, 2020

  
\_\_\_\_\_  
Janna Ferrero  
Attorney for Petitioner Cory Briggs

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6  
7 Dated: August \_\_\_, 2020

\_\_\_\_\_  
Matthew C. Alvarez  
Attorney for Real Party in Interest  
Mara Elliott

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10  
11 Dated: August \_\_\_, 2020

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Brian Pierik  
Attorney for Respondent  
Elizabeth Maland

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15 Dated: August \_\_\_, 2020

\_\_\_\_\_  
Christina Snider  
Attorney for Respondent  
Michael Vu

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19 **ORDER ISSUING PERMANENT INJUNCTION**

20 Based on the Stipulations of the parties, and good cause having been demonstrated to the  
21 Court, IT IS HEREBY ORDERED that, by the issuance of this Permanent Injunction:

22 (1) Respondent ELIZABETH MALAND ("Maland") shall replace Elliott's original  
23 Candidate's Statement of Qualifications (Exhibit 1) with Elliott's amended Candidate's  
24 Statement of Qualifications (Exhibit 2);

25 (2) Maland shall provide Elliott's amended Candidate's Statement of Qualifications  
26 (Exhibit 2) to Respondent MICHAEL VU ("Vu"); and

27  
28 Stipulation re: Issuance of Permanent Injunction; [Proposed] Order

1 (3) Vu will cause Exhibit 2, instead of Exhibit 1, to be published in the voter information  
2 pamphlet in advance of the November 3, 2020 San Diego municipal election.

3  
4 Dated: August \_\_, 2020

5 \_\_\_\_\_  
6 Janna Ferraro  
7 Attorney for Petitioner Cory Briggs

8 Dated: August 20, 2020

9 \_\_\_\_\_  
10 Matthew C. Alvarez  
11 Attorney for Real Party in Interest  
12 Mara Elliott

13 Dated: August \_\_, 2020

14 \_\_\_\_\_  
15 Brian Pierik  
16 Attorney for Respondent  
17 Elizabeth Maland

18 Dated: August \_\_, 2020

19 \_\_\_\_\_  
20 Christina Snider  
21 Attorney for Respondent  
22 Michael Vu

23 **ORDER ISSUING PERMANENT INJUNCTION**

24 Based on the Stipulations of the parties, and good cause having been demonstrated to the  
25 Court, IT IS HEREBY ORDERED that, by the issuance of this Permanent Injunction:

26 (1) Respondent ELIZABETH MALAND ("Maland") shall replace Elliott's original  
27 Candidate's Statement of Qualifications (Exhibit 1) with Elliott's amended Candidate's  
28 Statement of Qualifications (Exhibit 2);

(2) Maland shall provide Elliott's amended Candidate's Statement of Qualifications  
(Exhibit 2) to Respondent MICHAEL VU ("Vu"); and

Stipulation re: Issuance of Permanent Injunction; [Proposed] Order

1 (3) Vu will cause Exhibit 2, instead of Exhibit 1, to be published in the voter information  
2 pamphlet in advance of the November 3, 2020 San Diego municipal election.


3  
4 Dated: August \_\_, 2020

5 \_\_\_\_\_  
Cory Briggs, Petitioner

6  
7 Dated: August \_\_, 2020

8 \_\_\_\_\_  
Matthew C. Alvarez  
Attorney for Real Party in Interest  
Mara Elliott

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11 Dated: August 20, 2020

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Brian Pierik  
Attorney for Respondent  
Elizabeth Maland

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15 Dated: August \_\_, 2020

16 \_\_\_\_\_  
Christina Snider  
Attorney for Respondent  
Michael Vu

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19 **ORDER ISSUING PERMANENT INJUNCTION**

20 Based on the Stipulations of the parties, and good cause having been demonstrated to the  
21 Court, IT IS HEREBY ORDERED that, by the issuance of this Permanent Injunction:

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23 Candidate's Statement of Qualifications (Exhibit 1) with Elliott's amended Candidate's  
24 Statement of Qualifications (Exhibit 2);

25 (2) Maland shall provide Elliott's amended Candidate's Statement of Qualifications  
26 (Exhibit 2) to Respondent MICHAEL VU ("Vu"); and

27  
28 Stipulation re: Issuance of Permanent Injunction; [Proposed] Order

1 (3) Vu will cause Exhibit 2, instead of Exhibit 1, to be published in the voter information  
2 pamphlet in advance of the November 3, 2020 San Diego municipal election.

3  
4 Dated: August \_\_, 2020

5 \_\_\_\_\_  
6 Janna Ferraro  
7 Attorney for Petitioner Cory Briggs

8 Dated: August \_\_, 2020

9 \_\_\_\_\_  
10 Matthew C. Alvarez  
11 Attorney for Real Party in Interest  
12 Mara Elliott

13 Dated: August \_\_, 2020

14 \_\_\_\_\_  
15 Brian Pierik  
16 Attorney for Respondent  
17 Elizabeth Maland

18 Dated: August 20, 2020

19 \_\_\_\_\_  
20 *Christina Snider*  
21 Christina Snider  
22 Attorney for Respondent  
23 Michael Vu

24 **ORDER ISSUING PERMANENT INJUNCTION**

25 Based on the Stipulations of the parties, and good cause having been demonstrated to the  
26 Court, IT IS HEREBY ORDERED that, by the issuance of this Permanent Injunction:

27 (1) Respondent ELIZABETH MALAND (“Maland”) shall replace Elliott’s original  
28 Candidate’s Statement of Qualifications (Exhibit 1) with Elliott’s amended Candidate’s  
Statement of Qualifications (Exhibit 2);

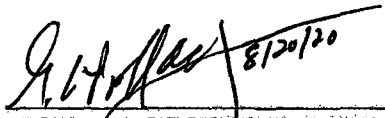
(2) Maland shall provide Elliott’s amended Candidate’s Statement of Qualifications  
(Exhibit 2) to Respondent MICHAEL VU (“Vu”); and

Stipulation re: Issuance of Permanent Injunction; [Proposed] Order

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(3) Vu shall cause Exhibit 2, instead of Exhibit 1, to be published in the voter information pamphlet in advance of the November 3, 2020 San Diego municipal election.

Dated: August \_\_\_\_, 2020

  
HON. GREGORY W. POLLACK  
JUDGE, SAN DIEGO COUNTY  
SUPERIOR COURT

Stipulation re: Issuance of Permanent Injunction; [Proposed] Order

# **Exhibit 1**



The City of San Diego

RECEIVED  
CITY CLERK'S OFFICE

20 JUL 28 PM 1:50

CANDIDATE'S STATEMENT OF QUALIFICATIONS

SAN DIEGO, CALIF.

City Name:  
(ALL CAPS)

CITY OF SAN DIEGO

Office Sought:  
(ALL CAPS)

CITY ATTORNEY

Type statement within the box provided below. Use block paragraph/justified alignment format. If you wish for your name to be included within your Statement of Qualifications, you must include it as part of your 200-word count. Word count starts here:

Mara Elliott  
San Diego City Attorney

Mara Elliott - Protecting San Diego

Through challenging times, Mara Elliott continues to protect San Diego - our families, neighborhoods, and most vulnerable residents - by:

- Taking Swift Action On Coronavirus. Worked to enact emergency public health orders, protect families from evictions. Cracked down on coronavirus scams, prosecuted substandard living facilities that put seniors at risk.
- Preventing Gun Violence. Pioneered Gun Violence Restraining Orders in San Diego, removing hundreds of weapons from dangerous people, including those who threaten mass shootings.
- Defending Victims of Abuse. Expanded safety services for victims of domestic violence, sex trafficking. Added prosecutors to bring abusers to justice.
- Reforming Criminal Justice. Enacted programs that treat, not punish, substance abuse, mental illness. Committed to equal justice for all.
- Safeguarding Taxpayer Dollars. Saved millions by defeating frivolous lawsuits, making polluters pay to clean up their mess.

Mara Elliott's passion is rooted in life experience. Mara is a mother, wife, daughter of an immigrant, and first woman elected City Attorney.

For fearlessly protecting San Diego, Mara Elliott was named California's 2020 Public Lawyer of the Year.

Endorsements:

- San Diego Firefighters
- San Diegans for Gun Violence Prevention
- San Diegans Against Crime
- San Diego Union-Tribune
- San Diego Deputy City Attorneys Association
- Planned Parenthood Action Fund

[www.MaraElliott.com](http://www.MaraElliott.com)

# **Exhibit 2**



The City of San Diego

CANDIDATE'S STATEMENT OF QUALIFICATIONS

City Name: CITY OF SAN DIEGO
(ALL CAPS)

Office Sought: CITY ATTORNEY
(ALL CAPS)

Type statement within the box provided below. Use block paragraph/justified alignment format. If you wish for your name to be included within your Statement of Qualifications, you must include it as part of your 200-word count. Word count starts here:

Mara Elliott
San Diego City Attorney

Mara Elliott - Protecting San Diego

Through challenging times, Mara Elliott continues to protect San Diego - our families, neighborhoods, and most vulnerable residents - by:

- Taking Swift Action On Coronavirus. Worked to enact emergency public health orders, protect families from evictions, Cracked down on coronavirus scams, prosecuted substandard living facilities that put seniors at risk.
• Preventing Gun Violence. Pioneered Gun Violence Restraining Orders in San Diego, removing hundreds of weapons from dangerous people, including those threatening mass shootings.
• Defending Victims of Abuse. Expanded safety services for domestic violence victims. Added prosecutors to bring abusers to justice.
• Reforming Criminal Justice. Enacted programs that treat, not punish, substance abuse, mental illness. Committed to equal justice.
• Safeguarding Taxpayer Dollars. Saved millions defeating frivolous lawsuits, making polluters pay to clean up their mess.

Mara Elliott's passion is rooted in life experience. Mara's a mother, wife, daughter of an immigrant, first woman elected City Attorney.

For fearlessly protecting San Diego, Mara Elliott was named California's 2020 Public Lawyer of the Year.

- Endorsements:
San Diego Firefighters
San Diegans for Gun Violence Prevention
San Diegans Against Crime
San Diego Deputy City Attorneys Association
Planned Parenthood Action Fund

Union-Tribune on Mara Elliott: "San Diegans are safer because of her"

**PROOF OF SERVICE**

1. My name is Ashley Engelman. I am over the age of eighteen. I am employed in the State of California, County of San Diego.

2. My  business \_\_\_\_\_ residence address is 4891 Pacific Highway, Suite 104, San Diego, CA 92110

3. On August 20, 2020, I served \_\_\_\_\_ an original copy  a true and correct copy of the following documents: Stipulation RE: Issuance of Permanent Injunction; Order

4. I served the documents on the person(s) identified on the attached mailing/service list as follows:

*by personal service.* I personally delivered the documents to the person(s) at the address(es) indicated on the list.

*by U.S. mail.* I sealed the documents in an envelope or package addressed to the person(s) at the address(es) indicated on the list, with first-class postage fully prepaid, and then I

\_\_\_\_\_ deposited the envelope/package with the U.S. Postal Service

\_\_\_\_\_ placed the envelope/package in a box for outgoing mail in accordance with my office's ordinary practices for collecting and processing outgoing mail, with which I am readily familiar. On the same day that mail is placed in the box for outgoing mail, it is deposited in the ordinary course of business with the U.S. Postal Service.

I am a resident of or employed in the county where the mailing occurred. The mailing occurred in the city of \_\_\_\_\_, California.

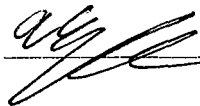
*by overnight delivery.* I sealed the documents in an envelope/package provided by an overnight-delivery service and addressed to the person(s) at the address(es) indicated on the list, and then I placed the envelope/package for collection and overnight delivery in the service's box regularly utilized for receiving items for overnight delivery or at the service's office where such items are accepted for overnight delivery.

*by facsimile transmission.* Based on an agreement of the parties or a court order, I sent the documents to the person(s) at the fax number(s) shown on the list. Afterward, the fax machine from which the documents were sent reported that they were sent successfully.

*by e-mail delivery.* Based on the parties' agreement or a court order or rule, I sent the documents to the person(s) at the e-mail address(es) shown on the list. I did not receive, within a reasonable period of time afterward, any electronic message or other indication that the transmission was unsuccessful.

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

Date: August 20, 2020

Signature: 

## SERVICE LIST

*Cory J. Briggs v. Elizabeth Maland et al.*

San Diego County Superior Court Case no. 37-2020-00028168-CU-WM-CTL

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OFFICE OF COUNTY COUNSEL

Attorneys for Respondent Michael Vu

Christina Snider

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San Diego, CA 92101

christina.snider@sdcounty.ca.gov

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Elliott

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