

1 JAMES S. BURLING, No. 113013
E-mail: jsb@pacificlegal.org
2 CHRISTOPHER M. KIESER, No. 298486
E-mail: jft@pacificlegal.org
3 Pacific Legal Foundation
930 G Street
4 Sacramento, California 95814
Telephone: (916) 419-7111
5 Facsimile: (916) 419-7747

6 JONATHAN C. CORN, No. 156983
E-mail: joncorn@axelsoncorn.com
7 VINCENT J. AXELSON, No. 159549
E-mail: vaxelson@axelsoncorn.com
8 Axelson & Corn, P.C.
9 160 Chesterfield Drive, Suite 201
10 Cardiff by the Sea, California 92007
Telephone: (760) 944-9006
11 Facsimile: (760) 454-1886

12 Attorneys for Plaintiff and Petitioner

13
14 SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 COUNTY OF SAN DIEGO, NORTH COUNTY DIVISION

16 BEACH & BLUFF CONSERVANCY,)

17 Plaintiff and Petitioner,)

18 v.)

19 CITY OF SOLANA BEACH, et al.)

20 Defendant and Respondent,)

21 _____)
22 CALIFORNIA COASTAL COMMISSION,)
a state agency; SURFRIDER FOUNDATION,)
23 a non-profit organization.)

24 Defendants/Respondents-Intervenors.)
25 _____)

CASE NO. 37-2013-00046561-CU-WM-NC

**NOTICE OF MOTION IN SUPPORT OF
MOTION FOR JUDGMENT ON THE
PLEADINGS/PETITION**

[IMAGED FILE]

Date: March 25, 2016

Time: 1:30 p.m.

Judge: Hon. Timothy M. Casserly

Dept.: N-31

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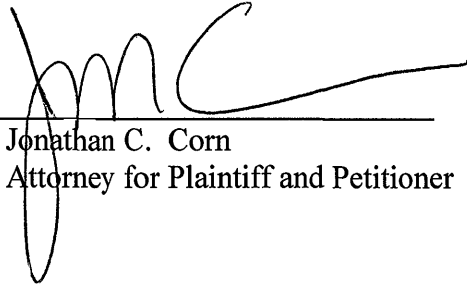
28 ///

1 of an existing stairway. Like the constitutional claims, the Conservancy's Coastal Act claims are
2 purely legal and only the text of the LUP is necessary to decide them.

3 Dated: March 3, 2016

JAMES S. BURLING
CHRISTOPHER M. KIESER
Pacific Legal Foundation

JONATHAN C. CORN
VINCENT J. AXELSON
Axelson & Corn, P.C.

8
9 By: 
10 _____
11 Jonathan C. Corn
12 Attorney for Plaintiff and Petitioner
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DECLARATION OF SERVICE

I, Kristine Merel, declare as follows:

I am a resident of the State of California, residing or employed in Cardiff, California. I am over the age of 18 years and am not a party to the above-entitled action. My business address is 160 Chesterfield Dr., Suite 201, Cardiff, California 92007.

On March 3, 2016, true copies of:

NOTICE OF MOTION IN SUPPORT OF MOTION FOR JUDGMENT ON THE PLEADINGS/PETITION

were emailed and placed in envelopes addressed to:

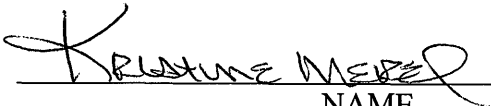
Kamala D. Harris
Attorney General of California
Jamee Jordan Patterson
Supervising Deputy Attorney General
110 West A Street, Suite 1100
San Diego, CA 92101
Jamee.patterson@doj.ca.gov

Steven H. Kaufmann
Richards, Watson & Gershon
355 South Grand Avenue, 40th Floor
Los Angeles, CA 90071-3101
skaufmann@rwglaw.com

Angela T. Howe
Surfrider Foundation
P.O. Box 6010
San Clemente, CA 92674
ahowe@surfrider.org

which envelopes, with postage thereon fully prepaid, were then sealed and deposited in a mailbox regularly maintained by the United States Postal Service in Cardiff, California.

I declare under penalty of perjury that the foregoing is true and correct and that this declaration was executed this 3rd day of March, 2016, at Cardiff, California.


NAME

Kiren Mathews

From: Jim Burling
Sent: Thursday, March 03, 2016 5:36 PM
To: EDM Files
Cc: Christopher M. Kieser
Subject: FW: eService Alert! Case No. 37-2013-00046561-CU-WM-NC. Notice of Motion for Judgment on the Pleadings

Just in case you didn't receive this.

From: eservice@onelegal.com [mailto:eservice@onelegal.com]
Sent: Thursday, March 3, 2016 4:22 PM
To: Jim Burling <jsb@pacificlegal.org>
Subject: eService Alert! Case No. 37-2013-00046561-CU-WM-NC. Notice of Motion for Judgment on the Pleadings

This is to inform you that you are being served electronically. To view the details of this service and view the eService documents, click on the link below or copy and paste the link into your browser.

eSERVICE SUMMARY

Submitted By: Corn, Jonathan Submitted On: Thu, Mar 3, 2016

eService Recipient: James S. Burling Email: jsb@pacificlegal.org

Court: Superior Court of California, San Diego County Case No.: 37-2013-00046561-CU-WM-NC Case Title: Beach & Bluff Conservancy vs. City of Solana Beach [IMAGED]

<https://platform.onelegal.com/Eservice/Index/M2BgO5GwJE2lArqsCfVZmw>

DOCUMENTS SUMMARY

Notice of Motion for Judgment on the Pleadings Notice of Motion for Judgment on the Pleadings

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