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10 Attorneys for Petitioners PEGGY HALL and  
11 CHILDREN'S HEALTH DEFENSE,  
12 CALIFORNIA CHAPTER

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
14 **FOR THE COUNTY OF ORANGE**

15 **PEGGY HALL**, an individual;  
16 **CHILDREN'S HEALTH DEFENSE-**  
17 **CALIFORNIA CHAPTER**, a California  
18 501(c)(3) non-profit corporation, on its own  
19 and on behalf of its members

20 Petitioner,

21 vs.

22 **COUNTY OF ORANGE; ORANGE**  
23 **COUNTY BOARD OF SUPERVISORS,**

24 Respondents.

Case No.: 30-2021-01220678-CU-WM-CJC  
Assigned for All Purposes to: Judge Richard Y.  
Lee  
Dept.: W15

**REQUEST FOR JUDICIAL NOTICE IN  
SUPPORT OF PETITIONERS'  
OPPOSITION TO RESPONDENTS'  
NOTICE OF RELATED CASES AND  
REQUEST FOR SANCTIONS PURSUANT  
TO *CODE OF CIVIL PROCEDURE*,  
SECTION 128.5 *ET SEQ.***

*[Opposition filed concurrently herewith]*

Complaint Filed: September 14, 2021  
Trial: December 1, 2022

25 **TO THIS HONORABLE COURT AND TO ALL PARTIES AND COUNSEL OF RECORD:**

26 PLEASE TAKE NOTICE that pursuant to *Evidence Code*, sections 451 and 452, Petitioners  
27 PEGGY HALL and CHILDREN'S HEALTH DEFENSE, CALIFORNIA CHAPTER will and hereby  
28 do request that this Court take judicial notice of the following in support of Petitioners' Opposition to  
the untimely Notice of Related Cases of Respondents ORANGE COUNTY and ORANGE COUNTY  
BOARD OF SUPERVISORS and Request for Sanctions, filed currently herewith.

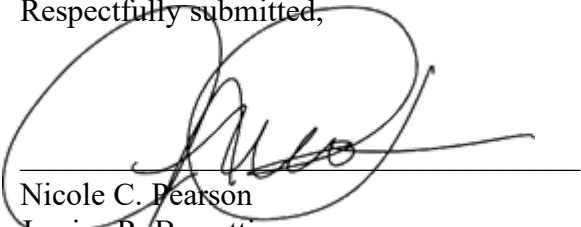
1           1. The entire file, and all its contents subject to public inspection, filed with this Court in  
2 Department W15 of the Orange County Superior Court, West Justice Center, in *Peggy Hall v. County*  
3 *of Orange, Orange County Board of Supervisors* (Case No. 30-2021-01220678-CU-WM-CJC).  
4 “Judicial notice shall be taken of the following: (a) The decisional, constitutional, and public statutory  
5 law of this state...” Evid. Code, § 452 subd. (a).

6           2. The entire file and all its contents subject to public inspection, filed with Department C18  
7 of the Orange County Superior Court, Central Justice Center, in *Orange County Board of Education v.*  
8 *Gavin Newsom* (Case No. 2021-01233170-CU-CR-CJC). “Judicial notice shall be taken of the  
9 following: (a) The decisional, constitutional, and public statutory law of this state...” Evid. Code, § 452  
10 subd. (a).

11  
12 Dated: October 17, 2022

Respectfully submitted,

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14  
15 By:



Nicole C. Pearson  
Jessica R. Barsotti  
Rita Barnett-Rose  
Attorneys for Petitioners PEGGY HALL and  
CHILDREN’S HEALTH DEFENSE,  
CALIFORNIA CHAPTER

**PROOF OF SERVICE**

I am over the age of 18 and not a party to the within action. My business address is **3421 Via Oporto, Suite 201, Newport Beach, Calif. 92263.**

On October 17, 2022, I served the following document(s) described as **PETITIONERS’ REQUEST FOR JUDICIAL NOTICE IN OPPOSITION TO RESPONDENTS’ NOTICE OF RELATED CASES AND REQUEST FOR SANCTIONS PURSUANT TO CODE OF CIVIL PROCEDURE, SECTION 128.5 ET SEQ.** on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Laura Knapp Kayla Watson Office of the County Counsel County of Orange 400 West Civic Center Drive, Suite 202 Santa Ana, CA 92701-1379 714.834.3400 <i>Deputy County Counsel</i>	<a href="mailto:Suzy.Shoai@coco.ocgov.com">Suzy.Shoai@coco.ocgov.com</a> <a href="mailto:Kayla.Watson@coco.ocgov.com">Kayla.Watson@coco.ocgov.com</a> <a href="mailto:Kevin.Dunn@coco.ocgov.com">Kevin.Dunn@coco.ocgov.com</a> <a href="mailto:leon.page@coco.ocgov.com">leon.page@coco.ocgov.com</a> <a href="mailto:Laura.Knapp@coco.ocgov.com">Laura.Knapp@coco.ocgov.com</a>
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**Via Electronic Transmission.** By personally emailing the aforementioned document(s) in PDF format to the respective email address(es) listed above on pursuant to stipulation and agreement between counsel for the parties and/or Court order. I did not receive an electronic message indicating any errors in transmission.

**By Mail.** I am “readily familiar” with the firm’s practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U. S. Postal Service on that same day with postage thereon fully prepaid at Irvine, CA in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing of affidavit.

**By Personal Service.** I delivered such envelope by hand to the addressee on 09/14/2021.

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

**Federal.** I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed at **NEWPORT BEACH, California.**

\_\_\_\_\_  
**MICHELLE CUSUMANO**

DATED: October 17, 2022