

1 XAVIER BECERRA
Attorney General of California
2 MARK BECKINGTON, State Bar No. 126009
Supervising Deputy Attorney General
3 GABRIELLE D. BOUTIN, State Bar No. 267308
Deputy Attorney General
4 1300 I Street, Suite 125
P.O. Box 944255
5 Sacramento, CA 94244-2550
Telephone: (916) 210-6053
6 Fax: (916) 324-8835
E-mail: Gabrielle.Boutin@doj.ca.gov
7 *Attorneys for Defendant*
Attorney General Xavier Becerra
8

9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE EASTERN DISTRICT OF CALIFORNIA
11
12

13 **MICHAEL RICHARDSON,**

14 Plaintiff,

15 v.

16
17 **JEFFERSON SESSIONS, in his official**
capacities; XAVIER BECERRA, in his
18 **official capacities,**

19 Defendants.

2:17-cv-1838 JAM AC PS

**INITIAL DISCLOSURES OF
DEFENDANT ATTORNEY GENERAL
XAVIER BECERRA**

(Fed. R. Civ. Proc. Rule 26(a)(1))

Judge: The Honorable John A.
Mendez

Trial Date: None set

Action Filed: September 5, 2017

20
21 Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant Attorney
22 General Xavier Becerra hereby provides the initial disclosures set forth below. Defendant's
23 investigation and discovery are ongoing. At this stage of the action, Defendant makes the
24 following initial disclosures:
25
26
27
28

1 **A. Individuals likely to have discoverable information that Defendant may use to**
2 **support his defense in this action**

- 3 • Plaintiff Michael Richardson.

4 Defendant will supplement this response when and if necessary in accordance the parties'
5 obligations under Federal Rule of Civil Procedure rule 26(e)(1)(a).

6 **B. Documents, electronically-stored information, and things that Defendant has in his**
7 **possession, custody, or control and may use to support his defenses in this action**

- 8 • Legislative history records related to Assembly Bill 488 and attached in Exhibit A to
9 the Declaration of Kara Wieland in support of Defendant's Motion to Dismiss
10 Complaint, filed in this action on November 27, 2017.
11 • The pleadings, records, declarations, and other documents filed by the parties in this
12 action.

13 Defendant will supplement this response when and if necessary in accordance the parties'
14 obligations under Federal Rule of Civil Procedure rule 26(e)(1)(a).

15 **C. Computation of damages**

16 Not applicable.

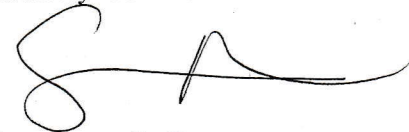
17 **D. Insurance agreements**

18 Not applicable.

19 Dated: May 7, 2018

Respectfully submitted,

20 XAVIER BECERRA
21 Attorney General of California



22 GABRIELLE D. BOUTIN
23 Deputy Attorney General
24 *Attorneys for Defendant*
25 *Attorney General Xavier Becerra*

26 SA2017109100
27 13071178.docx
28

DECLARATION OF SERVICE BY U.S. MAIL

Case Name: **Richardson, Michael v. Jefferson Sessions, et al.**
No.: **2:17-cv-1838 JAM AC PS**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On May 7, 2018, I served the attached **INITIAL DISCLOSURES OF DEFENDANT ATTORNEY GENERAL XAVIER BECERRA** by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550, addressed as follows:

Michael Richardson
4624 Ashdale Court, #4
Sacramento, CA 95841
In Pro Per

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on May 7, 2018, at Sacramento, California.

Eileen A. Ennis

Declarant



Signature