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**SUPREME COURT COPY**

March 30, 2016

Our File No. 48011.0003

**SUPREME COURT  
FILED**

APR - 1 2016

Frank A. McGuire Clerk

Deputy

Honorable Chief Justice Cantil-Sakauye and  
Associate Justices of the California Supreme Court  
350 McAllister Street  
San Francisco, CA 94102-4797

Re: *Citizens for Fair REU Rates, et al. v. City of Redding, et al.* (S224779):  
Notice of New Authority

Honorable Chief Justice and Associate Justices:

I represent the City of Redding ("City") in the above-captioned case. I write under California Rules of Court, rule 8.250(d), to inform the Court of a new authority not available for briefing: *California Cannabis Coalition v. City of Upland* (Mar. 18, 2016, E063664) \_\_\_ Cal.App.4th \_\_\_ [2016 WL 1072858] (*California Cannabis*).

Among other issues, *California Cannabis* discusses the term "impose" as used by Propositions 218 and 26. (*Id.* at pp. \*7-\*10.) In particular, the Fourth District adopted the definitions of the term "impose" in *Ponderosa Homes, Inc. v. City of San Ramon* (1994) 23 Cal.App.4th 1761, and in the League of California Cities' Proposition 218 and Proposition 26 Implementation Guides, to construe the meaning of that term in Propositions 13, 218 and 26. (*California Cannabis, supra*, 2016 WL 1072858 at pp. \*9-\*10.) This is relevant to the discussion of the term "impose" in the City's Opening Brief at pages 48 to 55 and in its Answer to Amicus Curiae Briefs at pages 8 and 14.

Honorable Chief Justice Cantil-Sakauye and Associate Justices of the California  
Supreme Court  
March 30, 2016  
Page 2

If the Court would prefer to have the parties provide supplemental briefing to discuss the relevance of this new authority to this case, the City would be happy to do so.

Respectfully,



Jon R. di Cristina  
SBN: 282278

JRD:jrd

Enclosure: Proof of Service


**PROOF OF SERVICE**

*Citizens for Fair REU Rates v. City Of Redding*  
California Supreme Court Case No. S224779  
Third District Court of Appeal Case No. C071906  
Shasta County Superior Court Case No. 171377

I, Ashley A. Lloyd, declare:

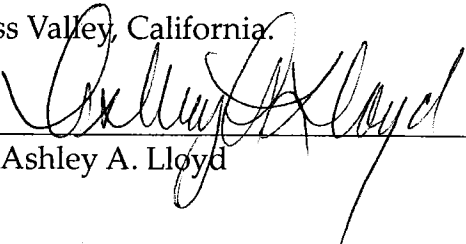
I am employed in the County of Nevada, State of California. I am over the age of 18 and not a party to the within action. My business address is 420 Sierra College Drive, Suite 140, Grass Valley, California 95945-5091. On March 30, 2016 I served the document(s) described as **LETTER REGARDING NEW AUTHORITY** on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

**SEE ATTACHED LIST**

 BY MAIL: The envelope was mailed with postage thereon fully prepaid. 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 Grass Valley, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if the postal cancellation date or postage meter date is more than one day after service of deposit for mailing in affidavit.

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

Executed on March 30, 2016, at Grass Valley, California.

  
\_\_\_\_\_  
Ashley A. Lloyd

## SERVICE LIST

*Citizens for Fair REU Rates v. City of Redding*  
California Supreme Court Case No. S224779  
Third District Court of Appeal Case No. C071906  
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