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SUPREME COURT COPY

Our File No. 48011.0003

May 21, 2018

Chief Justice Tani Cantil-Sakauye and Associate Justices
California Supreme Court
350 McAllister Street
San Francisco, California 91402-4797

Re: ***Citizens for Fair REU Rates v. City of Redding*** (Case No. S224779):
Request for Leave; Notice of Additional Authorities for Oral Argument

Honorable Chief Justice and Associate Justices:

I represent Respondent City of Redding ("City") in the above-captioned matter set for argument on May 30, 2018. I write under California Rules of Court, rule 8.520(d), to seek this Court's leave to file this notice of an additional authority for argument one day after the 10-day period specified by the rule.

Good cause to do so arises from the fact the Court gave 21 days' notice of this argument, leaving seven business days to file this notice. In that time, I argued *Reid v. City of San Diego*, Case No. D072493 to the Fourth District; attended a two-day meeting of the Board of Trustees of the State Bar of California, of which I am the Chair; and participated in drafting an answer to a petition for review in *Urgent Care Medical Services, Inc. v. City of Pasadena*, 2nd DCA Case Nos. B277868, B277827, reply briefs in *Saavedra v. City of Glendale*, 2nd DCA Case No. B283731 and *Glendale Coalition for Better Government v. City of Glendale*, 2nd DCA Case No. B283819, a motion to strike and an opposition to a motion to take new evidence on appeal in *City of San Buenaventura v. United Water Conservation District* on remand from this Court as 2nd DCA Case No. B251810, and a motion to strike a jury demand in *Jacks v. City of Santa Barbara*, on remand from this court as Santa Barbara Superior Court Case No. 1383959.

I wish to argue this authority, in addition to those briefed:

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MAY 22 2018

CLERK SUPREME COURT

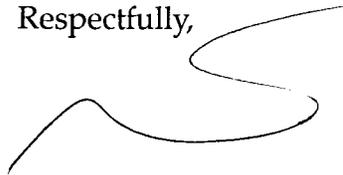
Chief Justice Tani Cantil-Sakauye

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Sterling Park, L.P. v. City of Palo Alto (2013) 57 Cal.4th 1193, 1206 [limiting *Barratt American, Inc. v. City of Rancho Cucamonga* (2005) 37 Cal.4th 685 to fees governed by Government Code section 66014 and 66022 of the Mitigation Fee Act].

Respectfully,



Michael G. Colantuono
State Bar No. 143551

MGC:lw

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 (Consol. with Case No. 172960)

I, Ashley A. Lloyd, declare:

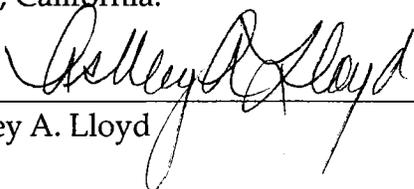
I am employed in the County of Nevada, State of California. I am over the age of 18 and not a party to the within action. My business address is 420 Sierra College Drive, Suite 140, Grass Valley, California 95945-5091. On May 21, 2018 I served the document(s) described as **NOTICE OF NEW AUTHORITY** 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 May 21, 2018 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
Shasta County Superior Court Case No. 171377 (Consol. with Case No. 172960)

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