

Dept 38

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**FILED**  
Superior Court of California  
County of Los Angeles

JUL 15 2022 22LA00780628

Sheri R. Carter, Executive Officer/Clerk of Court

By: A. Ortiz, Deputy

Attorneys for Plaintiffs,  
Robin Crest, Earl De Vries, and Judy De Vries

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF LOS ANGELES**

ROBIN CREST, EARL DE VRIES, and  
JUDY DE VRIES,

Plaintiffs,

v.

ALEX PADILLA,<sup>1</sup> in his official capacity as  
Secretary of State of the State of California.

Defendant.

Case No. 19STCV27561

**[PROPOSED] FINAL JUDGMENT AND  
PERMANENT INJUNCTION**

<sup>1</sup> Dr. Shirley N. Weber is the current Secretary of State.

07/21/2022

1 **FINAL JUDGMENT AND PERMANENT INJUNCTION**

2 On September 20, 2019, Plaintiffs Robin Crest, Earl De Vries, and Judy De Vries filed their  
3 Amended Complaint for Declaratory and Injunctive Relief ("Amended Complaint") against Defendant  
4 Alex Padilla in his official capacity as Secretary of State of the State of California ("California Secretary  
5 of State"). On June 29, 2020, Defendant California Secretary of State filed an Answer to Plaintiffs'  
6 Amended Complaint.

7 By its Ruling on Submitted Trial and its Verdict, filed on May 13, 2022, this Court determined  
8 that Plaintiffs are entitled to judgment on the sole cause of action in Plaintiffs' Amended Complaint.  
9 Specifically, the Court determined that Senate Bill 826, California Corporations Code §§ 301.3 and  
10 2115.5, violates article I, section 7, the Equal Protection Clause of the California Constitution, and is  
11 thus enjoined. In view of its determination, the Court found it unnecessary to make any determination  
12 with respect to California Corporations Code §§ 301.3 and 2115.5 under article I, section 31, of the  
13 California Constitution.

14 This Court's May 13, 2022 Ruling on Submitted Trial and Verdict leave no claims or causes of  
15 action for resolution by this Court.

16 Accordingly, this Court hereby ORDERS, ADJUDGES, AND DECREES as follows:

17 1. This Court declares that Senate Bill 826, specifically, California Corporations Code  
18 §§ 301.3 and 2115.5, violates the Equal Protection Clause of the California Constitution, Cal. Const.,  
19 art. I, § 7.

20 2. Defendant California Secretary of State is hereby permanently enjoined and prohibited  
21 from expending or causing any expenditure of the estate, funds, or other property of the State on  
22 California Corporations Code §§ 301.3 and 2115.5.

23 3. Judgment shall be entered forthwith in favor of Plaintiffs Robin Crest, Earl De Vries, and  
24 Judy De Vries, and against Defendant California Secretary of State.

25 4. Plaintiffs Robin Crest, Earl De Vries, and Judy De Vries shall recover their costs herein  
26 as allowed by law.

27 7-15-22

28   
JUDGE OF THE SUPERIOR COURT

1 **PROOF OF SERVICE**

2 I, Robert Patrick Sticht, declare as follows:

3 I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled  
4 action. I am employed at Judicial Watch, Inc., 425 Third Street SW, Suite 800, Washington DC 20024.

5 On June 25, 2022, I served the following document(s):

6 **[PROPOSED] FINAL JUDGMENT AND PERMANENT INJUNCTION**

7 on the following persons:

8 Laura L. Faer  
9 Vilma Palma-Solana  
10 Supervising Deputy Attorneys General  
11 Ashante L. Norton  
12 Anthony V. Seferian  
13 Alexis M. Piazza  
14 Deputy Attorneys General  
15 300 South Spring Street  
16 Los Angeles CA 90013-1230  
17 Attorneys for Alex Padilla

18 ☒ BY UNITED STATES MAIL: Following ordinary business practices, I caused true and correct  
19 copies of the above documents to be sealed in addressed envelope(s) and placed for collection and  
20 mailing with the United States Postal Service. I am readily familiar with the firm's practices for  
21 collecting and processing mail. In the ordinary course of business, the sealed envelope(s) that were  
22 placed for collection would be deposited, postage prepaid, with the United States Postal Service that  
23 same day.

24 ☐ BY OVERNIGHT DELIVERY: I enclosed the documents in an envelope or package provided  
25 by an overnight delivery carrier and addressed to the persons at the addresses set forth above. I placed  
26 the envelope or package for collection and overnight delivery at an office or a regularly utilized drop  
27 box of the overnight delivery carrier.

28 ☒ BY ELECTRONIC MAIL: Based on a court order or an agreement of the parties to accept  
electronic service, I caused the documents to be served electronically through One Legal in portable  
document format ("PDF") Adobe Acrobat.

☒ BY EMAIL: I caused the documents to be served electronically to laura.faer@doj.ca.gov,  
vilma.solana@doj.ca.gov, ashante.norton@doj.ca.gov, anthony.seferian@doj.ca.gov, and  
alexis.piazza@doj.ca.gov in PDF format ("PDF") Adobe Acrobat.

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

Executed June 25, 2022, at Los Angeles, California.

/s/ Robert Patrick Sticht  
ROBERT PATRICK STICHT