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10 Attorneys for Defendants
CITY AND COUNTY OF SAN FRANCISCO, ET AL.

11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA

13 COUNTY OF SAN FRANCISCO

14 UNLIMITED JURISDICTION

15 UNITED SF FREEDOM ALLIANCE,
16 BHANU VIKRAM, CARSON R.
17 SCHILLING, CHRISTA L. FESTA,
18 CHRISTIANNE T. CROTTY, DENNIS M.
CALLAHAN, JR., FAIMING CHEUNG,
and JESSICA KWOK-BO LINDSEY,

19 Plaintiffs,

20 vs.

21 CITY AND COUNTY OF SAN
22 FRANCISCO, a municipal corporation and
administrative division of the State of
23 California, et al., and Does 1 through 100,
inclusive,

24 Defendants.
25

Case No. CGC-22-597428

**DEFENDANTS CITY AND COUNTY OF SAN
FRANCISCO, ET AL.'S DEMURRER TO THE
SECOND AMENDED COMPLAINT FOR
VIOLATION OF CIVIL RIGHTS AND
DECLARATORY AND INJUNCTIVE RELIEF**

Hearing Date: June 21, 2022
Hearing Judge: Judge Richard B. Ulmer
Time: 9:30 a.m.
Place: Dept. 302

Date Action Filed: January 4, 2022
Trial Date: None set.

1 Defendants CITY AND COUNTY OF SAN FRANCISCO (“the City”); CAROL ISEN, in her
2 individual capacity and in her official capacity as the Human Resources Director of the City; SUSAN
3 PHILIP in her individual capacity and in her official capacity as the Health Officer of the City;
4 JEANINE R. NICHOLSON in her individual capacity and in her official capacity as the Chief of
5 Department of the San Francisco Fire Department; PHILLIP A. GINSBURG. in his individual
6 capacity and his official capacity as the General Manager for the San Francisco Recreation and Parks;
7 KIMBERLY ACKERMAN, in her individual capacity and her official capacity as the Chief People
8 Officer for the San Francisco Municipal Transportation Agency; FABIAN PEREZ, in his individual
9 capacity and his official capacity as an administrator for the San Francisco Sheriff’s Office; and,
10 WILLIAM SCOTT, in his individual capacity and his official capacity as Chief of the Police for the
11 San Francisco Police Department (collectively “Defendants”), will and hereby does demurrer to the
12 Second Amended Complaint for Declaratory and Injunctive Relief of Plaintiffs UNITED SF
13 FREEDOM ALLIANCE; BHANU VIKRAM; CARSON R. SCHILLING; CHRISTA L. FESTA;
14 CHRISTIANNE T. CROTTY; DENNIS M. CALLAHAN, JR.; FAIMING CHEUNG; and JESSICA
15 KWOK-BO LINDSEY (“Plaintiffs”). Defendants brings this demurrer because Plaintiffs lack
16 standing to pursue declaratory and injunctive relief, and because Plaintiffs fail to state facts sufficient
17 to support their Causes of Action. (C.C.P. § 430.10, subd. (e).)

18
19 Dated: May 13, 2022

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