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10 TAXPAYERS FOR RESPONSIBLE LAND USE and LA JOLLA SHORES ASSOCIATION

11 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
12 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**

13 TAXPAYERS FOR RESPONSIBLE LAND)
14 USE, et al.,)

15 Plaintiffs and Petitioners,)

16 v.)

17 CITY OF SAN DIEGO, et al.,)

18 Defendants and Respondents.)

19 HILLEL OF SAN DIEGO, et al.,)

20 Real Parties-in-Interest.)

Case No. GIC867378

OPENING BRIEF: PETITIONERS'
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT OF WRIT OF
MANDAMUS UNDER CEQA

ASSIGNED FOR ALL PURPOSES TO:
Hon. Linda B. Quinn

Date: March 1, 2006

Time: 1:30 PM

Dept: 74

Action filed: June 12, 2006

21 Petitioners TAXPAYERS FOR RESPONSIBLE LAND USE and LA JOLLA SHORES
22 ASSOCIATION respectfully submit this Opening Brief: Petitioners' Memorandum of Points and
23 Authorities in Support of Mandamus Under CEQA.

24 Dated: January 8, 2007

COAST LAW GROUP LLP

25 
26 Todd T. Cardiff, Esq.

27 Attorneys for Petitioners
28 Taxpayers for Responsible Land Use
La Jolla Shores Association

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1 **STATUTES:**

2 **Public Resources Code:**

3 Pub. Res. Code § 21002 11

4 Pub. Res. Code § 21080 3, 9

5 Pub. Res. Code § 21091 13

6 Pub. Res. Code § 21100 3

7 Pub. Res. Code § 21151 3

9 **California Code of Regulations:**

10 14 CCR 15003 4

11 14 CCR 15064 7, 8, 9

12 14 CCR 15070 9

13 14 CCR 15384 3

15 **Other Authorities:**

16 Remy et al., GUIDE TO THE CAL. ENVIRONMENTAL QUALITY ACT (1999 ed.) 4

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