

Holland & Knight LLP  
400 South Hope Street, 8th Floor  
Los Angeles, CA 90071  
Tel: 213.896.2400  
Fax: 213.896.2450

Jennifer L. Hernandez (State Bar No. 114951)  
HOLLAND & KNIGHT LLP  
400 South Hope Street, 8th Floor  
Los Angeles, CA 90071  
Tel: (213) 896-2400  
Fax: (213) 896-2450  
Email: jennifer.hernandez@hklaw.com

Attorneys for Plaintiffs/Petitioners  
THE TWO HUNDRED, et al.

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF SACRAMENTO

THE TWO HUNDRED, an  
unincorporated association of civil  
rights leaders, and individuals JASON  
CORDOVA and LYNN BROWN-  
SUMMERS,

Plaintiffs/Petitioners,

vs.

GOVERNOR'S OFFICE OF PLANNING AND  
RESEARCH, CALIFORNIA NATURAL  
RESOURCES AGENCY, WADE  
CROWFOOT, in his Official Capacity, KATE  
GORDON, in her Official Capacity, and DOES  
1-50,

Defendants/Respondents.

**FILED/ENDORSED**

**APR 02 2021**

By: T. Crowther  
Deputy Clerk

) Case No.: 34-2020-80003447-CU-WM-GDS

)  
) **SECOND AMENDED VERIFIED**  
) **PETITION FOR WRIT OF MANDATE**  
) **AND COMPLAINT FOR**  
) **DECLARATORY AND INJUNCTIVE**  
) **RELIEF**

) [Cal. Code Civ. Proc. §§ 1085, 1094.5,  
) 1060; Gov. Code § 12955 et seq. (FEHA);  
) 42 U.S.C. § 3601 et seq., 24 C.F.R. Part  
) 100 (FHA); Cal. Const. Art. I, § 7; Art.  
) IV, § 16; U.S. Const. Amd. 14, § 1; Cal.  
) Const. Art. III, § 3; Pub. Res. Code §  
) 21000 et seq. (CEQA); H&S Code § 38500  
) et seq. (GWSA); H&S Code § 39000 et  
) seq. (CCAA); Gov. Code § 65088 et seq.  
) (Congestion Management Plan); Gov.  
) Code §§ 65300 et seq. and § 65584  
) (General Plan Laws and Regional  
) Housing Needs Assessment Law]

BY FAX

Holland & Knight LLP  
50 California Street, Suite 2800  
San Francisco, CA 94111  
Tel: 415.743.6900  
Fax: 415.743.6910

HOLLAND & KNIGHT LLP  
Jennifer L. Hernandez (State Bar No. 114951)  
Marne S. Sussman (State Bar No. 273712)  
Sarah A. Marsey (State Bar No. 297911)  
50 California Street, Suite 2800  
San Francisco, California 94111  
Telephone: 415.743.6900  
Facsimile: 415.743.6910  
Email: jennifer.hernandez@hklaw.com  
marne.sussman@hklaw.com  
sarah.marsey@hklaw.com

Attorneys for Petitioners/Plaintiffs

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF SACRAMENTO

THE TWO HUNDRED, an unincorporated  
association of civil rights leaders, and  
individuals JASON CORDOVA and LYNN  
BROWN-SUMMERS,

Petitioners/Plaintiffs,

vs.

GOVERNOR'S OFFICE OF PLANNING  
AND RESEARCH, CALIFORNIA  
NATURAL RESOURCES AGENCY,  
OFFICE OF ADMINISTRATIVE LAW, and  
DOES 1-50.

Respondents/Defendants.

Case No.: 34-2020-80003447-CU-WM-GDS

**PROOF OF SERVICE**

Complaint Filed: December 19, 2019

Trial Date: None

BY FAX

**FILED/ENDORSED**

**APR 02 2021**

By: T. Crowther  
Deputy Clerk

PROOF OF SERVICE