DAVID Y. IMAI, ESQ. ATTORNEY AT LAW

311 BONITA DRIVE APTOS, CALIFORNIA 95003 TELEPHONE: (831) 662-1706 FACSIMILE: (831) 662-0561 EMAIL: davidimai@sbcglobal.net

May 24, 2024

Re: Tamelin Stone, Amanda Kunwar and all others similarly situated v Alameda Health System et al.

California Supreme Court Case no S279137

Chief Justice Patricia Guerrero Associate Justices Supreme Court of California 350 McAllister Street Room 1295 San Francisco, California 94102

Dear Chief Justice Guerrero and Associate Justices:

Please take notice that pursuant to the Notice to Counsel Appearing for Oral Argument, Plaintiffs/Appellants Tamelin Stone and Amanda Kunwar may cite the following additional authorities at oral argument set in this matter for 9:00 a.m. On June 4, 2024:

1. <u>Alameda Health System v. Alameda County Employees Retirement Association</u> (3/27/24) 100 Cal.App.5th 1159, 1169-70. ("ACERA")

<u>ACERA</u> was published after the date for filing Plaintiff/Appellants' Answer Brief on the Merits in this matter. It is relevant to the issue of Defendant/Respondent Alameda Health System's financial and liability independence from the County of Alameda.

2. Wage Theft in California: Minimum Wage Violations, 2014-2023 Report by Daniel J. Galvin, Jake Barnes, Janice Fine, and Jenn Round, published the Rutgers School of Management and Labor Relations, page 1.

This study was published in May of 2024, after the date for filing Plaintiff/Appellants' Answer Brief on the Merits in this matter. It is relevant to policy issues regarding wage theft in California.

In addition, Plaintiffs/Appellants may refer to additional authority:

3. Government Code sec. 6502:

Gov. Code sec. 6502 is relevant to the issue of sovereign status for Joint Powers Authorities, which have all the powers of those local governments which contract to form them.

Chief Justice Patricia Guerrero Calif. Supreme Court May 24, 2024 p. 2

Thank you for your attention.

Very truly yours,

David Y. Imai, Esq.

DYI:wp 240524SC.wpd

PROOF OF SERVICE

STONE, KUNWAR, all others similarly situated v. ALAMEDA HEALTH SYSTEM, A Public Hospital Authority

California Supreme Court Case No.S279137

I am employed in the County of Santa Cruz, California. I am over the age of 18 years and not a party to the within entitled action. My business address is 311 Bonita Drive, Aptos, California 95003.

On May 24, 2024, I served the attached *PLAINTIFF/APPELLANTS' SUPPLEMENTAL AUTHORITY LETTER* in the above-captioned matter to the following persons:

Geoff Spellberg, Ryan McGinley-Stempel Anastasia Bondarchuk Renne Public Law Group 350 Sansome Street, Suite 300 San Francisco, Calif. 94104 VIA TRUEFILING	First District Court of Appeal Division 5 350 McAllister Street San Francisco, CA 94102 VIA TRUEFILING
California Employment Lawyers Association: Amicus curiae Ariel J. Stiller Stiller Law Firm 16133 Ventura Boulevard, Suite 1200 Encino, CA 91436 VIA TRUEFILING	American Federation of State, County and Municipal Employees: Amicus curiae Gillian Santos American Federation of State, County and Municipal Employees 1625 L Street, NW Washington, DC, DC 20036 Teague Pryde Paterson
	VIA TRUEFILING
Board of Trustees of the California State University : Amicus curiae	Kern County Hospital Authority : Amicus curiae
Jens B. Koepke Complex Appellate Litigation Group LLP 355 South Grand Avenue, Suite 2450 Los Angeles, CA 90071 VIA TRUEFILING	Brian P. Walter Liebert Cassidy Whitmore 6033 West Century Boulevard, #601 Los Angeles, CA 90045-6410 <i>VIA TRUEFILING</i>

	,
California Association of Joint Powers Authorities : Amicus curiae	California Special Districts Association : Amicus curiae
Michael G. Colantuono Colantuono, Highsmith & Whatley, PC 420 Sierra College Drive, Ste 140 Grass Valley, CA 95945 Pamela Kentos Graham Colantuono, Highsmith & Whatley 420 Sierra College Drive, Ste 140 Grass Valley, CA 95945 VIA TRUEFILING	Michael G. Colantuono Colantuono, Highsmith & Whatley, PC 420 Sierra College Drive, Ste 140 Grass Valley, CA 95945 Pamela Kentos Graham Colantuono, Highsmith & Whatley 420 Sierra College Drive, Ste 140 Grass Valley, CA 95945 <i>VIA TRUEFILING</i>
California State Association of Counties : Amicus curiae	League of California Cities : Amicus curiae
Michael G. Colantuono Colantuono, Highsmith & Whatley, PC 420 Sierra College Drive, Ste 140 Grass Valley, CA 95945 Pamela Kentos Graham Colantuono, Highsmith & Whatley 420 Sierra College Drive, Ste 140 Grass Valley, CA 95945 VIA TRUEFILING	Michael G. Colantuono Colantuono, Highsmith & Whatley, PC 420 Sierra College Drive, Ste 140 Grass Valley, CA 95945 Pamela Kentos Graham Colantuono, Highsmith & Whatley 420 Sierra College Drive, Suite 140 Grass Valley, CA 95945 VIA TRUEFILING
Hon. Noël Wise Alameda County Superior Court 1221 Oak Street, Floor 3 Oakland, CA 94612 Judge of the Superior Court of Alameda County BY U.S. MAIL	

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct, and that this is executed on May 24, 2024, in Aptos, California.

David Imai

STATE OF CALIFORNIA

Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIASupreme Court of California

Case Name: STONE v. ALAMEDA HEALTH

SYSTEM

Case Number: **S279137**Lower Court Case Number: **A164021**

- 1. At the time of service I was at least 18 years of age and not a party to this legal action.
- 2. My email address used to e-serve: davidimai@sbcglobal.net
- 3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
LETTER	Additional Authorities Letter

Service Recipients:

Person Served	Email Address	Туре	Date / Time
David Imai Law Office of David Y. Imai 142822	davidimai@sbcglobal.net	e- Serve	5/24/2024 12:34:07 PM
Ariel Stiller-Shulman Stiller Law Firm 294676	ari@stillerlawfirm.com	Serve	5/24/2024 12:34:07 PM
Jennifer Henning California State Association of Counties 193915	jhenning@counties.org	e- Serve	5/24/2024 12:34:07 PM
Kathryn Parker Complex Appellate Litigation Group LLP	paralegals@calg.com	Serve	5/24/2024 12:34:07 PM
Bobette Tolmer Renne Public Law Group	btolmer@publiclawgroup.com	I	5/24/2024 12:34:07 PM
Michael Colantuono Colantuono, Highsmith & Whatley, PC 143551	mcolantuono@chwlaw.us	e- Serve	5/24/2024 12:34:07 PM
Dustin Collier Collier Socks LLP 264766	dcollier@collierlawsf.com	l l	5/24/2024 12:34:07 PM
Scott Tillett Pine Tillett LLP 275119	stillett@pineappeals.com	e- Serve	5/24/2024 12:34:07 PM
Arthur Hartinger RENNE PUBLIC LAW GROUP 121521	ahartinger@publiclawgroup.com	I	5/24/2024 12:34:07 PM

Ryan McGinley-Stempel Renne Public Law Group 296182	rmcginleystempel@publiclawgroup.com	1	5/24/2024 12:34:07 PM
Teague Paterson American Federation Of State, County and Municipal Employees 226659	tpaterson@afscme.org	Serve	5/24/2024 12:34:07 PM
Gillian santos 888263178	gsantos@afscme.org	1	5/24/2024 12:34:07 PM
Amber Heinze Liebert Cassidy Whitmore	aheinze@lcwlegal.com	e- Serve	5/24/2024 12:34:07 PM
Brian Walter Liebert Cassidy Whitmore 171429	bwalter@lcwlegal.com	e- Serve	5/24/2024 12:34:07 PM
Pamela Graham Colantuono, Highsmith & Whatley, PC 216309	pgraham@chwlaw.us	e- Serve	5/24/2024 12:34:07 PM
McCall Williams Colantuono, Highsmith & Whatley, PC	mwilliams@chwlaw.us	e- Serve	5/24/2024 12:34:07 PM
Jens Koepke Complex Appellate Litigation Group LLP 149912	jens.koepke@calg.com	e- Serve	5/24/2024 12:34:07 PM

This proof of service was automatically created, submitted and signed on my behalf through my agreements with TrueFiling and its contents are true to the best of my information, knowledge, and belief.

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

5/24/2024		
Date		
/s/David Imai		
Signature		
Imai, David (142822)		
Last Name, First Name (PNum)		

Law Office of David Y. Imai

Law Firm