

COPY

In the Supreme Court of the State of California

SUPREME COURT COPY

CALIFORNIA REDEVELOPMENT  
ASSOCIATION, LEAGUE OF  
CALIFORNIA CITIES, CITY OF UNION  
CITY, CITY OF SAN JOSE, and JOHN F.  
SHIREY,

Case No. S194861

Petitioners,

v.

ANA MATOSANTOS, in her official  
capacity as Director of Finance, JOHN  
CHIANG, in his official capacity as the  
Controller of the State of California,  
PATRICK O'CONNELL, in his official  
capacity as the Auditor-Controller of the  
County of Alameda and as a representative  
of the class of county auditor-controllers,

Respondents.

SUPREME COURT  
FILED

AUG 31 2011

Frederick K. O'Riagh Clerk

Deputy

RESPONDENT'S OPPOSITION TO MOTION FOR CLARIFICATION  
AND MODIFICATION OF STAY

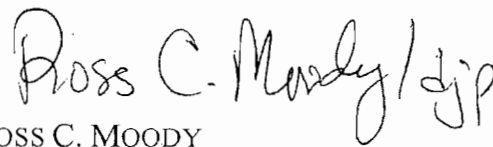
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State Solicitor General  
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Matosantos, Director of the California  
Department of Finance, and State  
Controller John Chiang*

Respondent Ana Matosantos, sued in her official capacity as Director of the California Department of Finance, respectfully opposes the Motion for Clarification and Modification of Stay filed by petitioners. Respondent believes that the August 17, 2011 Order partially staying ABX1 26 and 27 is an appropriate compromise that preserves the status quo pending the outcome of this case. The modification requested by petitioners would jeopardize the status quo by allowing RDAs to benefit from the new Voluntary Alternative Redevelopment Program while staying the financial obligations required by the new program. Respondent does not oppose lifting the stay entirely, but opposes the self-serving modifications currently sought by petitioners.

Dated: August 31, 2011

Respectfully submitted,

KAMALA D. HARRIS  
Attorney General of California  
MANUEL M. MEDEIROS  
State Solicitor General  
DOUGLAS J. WOODS  
Senior Assistant Attorney General  
PETER A. KRAUSE  
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A handwritten signature in black ink that reads "Ross C. Moody" followed by a stylized initial "djp".

ROSS C. MOODY  
Deputy Attorney General  
*Attorneys for Respondents Ana Matosantos,  
Director of the California Department of  
Finance, and State Controller John Chiang*

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**DECLARATION OF SERVICE BY U.S. MAIL**

Case Name: **California Redevelopment Association, et al. v. Matosantos, et al.**

No.: **S194861**

I declare:

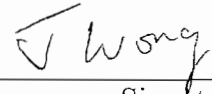
I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service that same day in the ordinary course of business.

On August 31, 2011, I served the attached **RESPONDENT'S OPPOSITION TO MOTION FOR CLARIFICATION AND MODIFICATION OF STAY** by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the internal mail collection system at the Office of the Attorney General at 455 Golden Gate Avenue, Suite 11000, San Francisco, CA 94102-7004, addressed as follows:

Steven L. Mayer Howard, Rice, Nemerovski, Canady, Falk & Rabkin Three Embarcadero Center, 7th Floor San Francisco, CA 94111-4024 (Attorneys for Petitioners)	Jennifer Rockwell Chief Counsel Department of Finance 915 "L" Street Sacramento, CA 95814
Claude Kolm Deputy County Counsel Alameda County Counsel's Office 1221 Oak Street, Room 450 Oakland, CA 94612-4296	Brian E. Washington Alameda County Counsel's Office 1221 Oak Street, Room 450 Oakland, CA 94612-4296
Richard J. Chivaro Chief Counsel State Controller's Office P.O. Box 942850 Sacramento, CA 94250	Lizanne Reynolds Deputy County Counsel Santa Clara County Counsel's Office 70 West Hedding Street, 9th Floor East Wing San Jose, CA 95125

I declare under penalty of perjury under the laws of the State of California the foregoing is true and correct and that this declaration was executed on August 31, 2011, at San Francisco, California.

Janet Wong  
\_\_\_\_\_  
Declarant

  
\_\_\_\_\_  
Signature

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