

TABLE OF CONTENTS RE DEMURRER TO PETITON

<i>Petition Cause of Action¹</i> ¶ 31	<i>Demurrer MP&A²</i> <i>III. Legal Arguments</i>	<i>Opposition to Demurrer</i> <i>IV. Argument</i>	<i>Reply</i> <i>II. L. Arg.</i>	<i>Opposition to Reply</i> <i>II. Arg.</i>
1 a-c Failure to properly construe:		B. -p3	A. -p1	A. -p1
a. April 1, 2014 Board Order	--	--	--	--
b. “formal action”	--	B. -p4 at 4	B. 1. -p3 at 3	B. 2. - p2
c. “continuing subject matter jurisdiction”	--	B. -p4 at 22	D. 1. -p8 at 3	B. 2. -p2
1 d. Failure to provide HRC a definition of which committees are subject to the Act	--	--	--	--
2 a-d. Allowing committees to engage in ongoing private meetings ³	<u>No alleged facts showing “legislative body” created⁴</u>	B. -p6 at 6-19		
d. CHIP committee	C. 2. - p6	C. 1. -p6	B. 1. -p2	B. 1. -p2 at 3
b. Board Agenda committee	D. 2. - p8	C. 2. -p7	C. 1. -p5	B. 1. -p2 at 6
a. April 1 Bd. Order committee	E. 1. - p10	C. 3. -p8	D. 1. -p8	B. 1. -p2 at 8
c. HRC Homeless committee	--	C. 4. -p8	--	B.1. -p2 at 11
	<u>Other issues in Demurrer</u>			
--	§54960.2 compliance re CHIP C. 1. -p5	D. 1. -p9	B. 2. -p4	C. 1. -p3
--	Setting agenda not subject to Act D. 1. -p8	D. 2. -p9	C. 3. -p7	C. 2. -p4
--	No Brown Act “meeting” held D. 3. -p9	D. 3. -p10	C. 2. -p6 & D.1. -p8 at 19	C. 3. -p5
2 e. Failing to adhere to the <u>Rules of the Board</u> re committees	This is not a Br. Act violation E. 2. -p11	D. 4. (p10)	D. 2. -p9	C. 4. -p5
--	Failure to name HRC as a respondent (indispensable party) F. 1. -p13 F. 2. -p14	D. 5. (p12) D. 6. (p12)	E. -p9	C. 5. -p5

¹ One cause of action, violations of the Brown Act

² Notice, Proposed Order and MP&A all written as if each named committee is a separate cause of action

³ List altered to match Demurrer listing order

⁴ Notice of Demurrer at p1 Ln 21, p2 Ln 2 and 10; and Prop.Order at p2 Ln 9, 19, 26