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FRESNO'S CHAFFEE ZOO
13 CORPORATION and JON FORREST DOHLIN

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15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF FRESNO**

17 NONHUMAN RIGHTS PROJECT, INC.,
18 on behalf of Amahle, Nolwazi, and Vusmusi,
19 individuals,

20 Petitioner,

21 v.

22 FRESNO'S CHAFFEE ZOO
CORPORATION, and JON FORREST
DOHLIN, in his official capacity as Chief
23 Executive Officer & Zoo Director of the
24 Fresno Chaffee Zoo,

25 Respondents.

Case No. 22CECG02471

**PEREMPTORY CHALLENGE TO
JUDICIAL OFFICER; DECLARATION
OF DAVID C. CASARRUBIAS
(Code Civ. Proc., § 170.6)**

Dept. 402

Assigned for All Purposes to the Hon.
Stephanie Negin

Action Filed: May 3, 2022

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**TO THE HON. DAVID KALEMKARIAN, PRESIDING JUDGE, SUPERIOR
COURT OF CALIFORNIA, COUNTY OF FRESNO:**

Respondents FRESNO’S CHAFFEE ZOO CORPORATION and JON FORREST
DOHLIN, by and through their counsel of record, Hanson Bridgett LLP, hereby move that:

1. The above-referenced case, which was assigned for all purposes to the Honorable
Judge Stephanie Negin, and involves a contested law or fact, be reassigned from that Judge; and,

2. No matters hereinafter arising in this cause be heard by or assigned to the
Honorable Judge Stephanie Negin on the ground that said Judge is prejudiced against Respondents
and/or its attorneys in this action.

This Motion is based on the matter contained herein, on Code of Civil Procedure section
170.6, and on the accompanying Declaration of David C. Casarrubias in Support of Respondent’s
Motion to Disqualify Pursuant to Code of Civil Procedure section 170.6.

WHEREFORE, Respondents pray that the relief herein requested be granted.

DATED: August 26, 2022

HANSON BRIDGETT LLP

By: s/ David C. Casarrubias
PAUL B. MELLO
ADAM W. HOFMANN
SAMANTHA D. WOLFF
DAVID C. CASARRUBIAS
Attorneys for Respondents
FRESNO’S CHAFFEE ZOO
CORPORATION and JON FORREST DOHLIN

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DECLARATION OF DAVID C. CASARRUBIAS

I, David C. Casarrubias, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am an associate with Hanson Bridgett LLP, attorneys of record for Respondents FRESNO’S CHAFFEE ZOO CORPORATION and JON FORREST DOHLIN. I have personal knowledge of the facts set forth herein, except as to those stated on information and belief and, as to those, I am informed and believe them to be true. If called as a witness, I could and would competently testify to the matters stated herein.

2. This case has been assigned to the Honorable Judge Stephanie Negin, Department 402, for all purposes. The Honorable Judge Stephanie Negin is prejudiced against Respondents or its attorneys, or the interest of the Respondents or its attorneys, so that I believe Respondents cannot have a fair and impartial trial or hearing before Judge Negin.

3. Wherefore, the undersigned attorney and Respondents hereby move for peremptory disqualification of the assigned Judge pursuant to Code of Civil Procedure, section 170.6, and respectfully move that no matters in this case be heard by or assigned to said Judge, and that this case be reassigned to a different Judge.

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

Executed on this 26th day of August, 2022, at San Francisco, California.



David C. Casarrubias

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PROOF OF SERVICE

**NonHuman Rights Project, Inc., et al. v. FRESNO'S CHAFFEE ZOO CORPORATION,
and JON FORREST DOHLIN, et al.
Fresno Superior Court, Case No. 22CECG02471**

STATE OF CALIFORNIA, COUNTY OF CONTRA COSTA

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Contra Costa, State of California. My business address is 1676 N. California Blvd., Suite 620, Walnut Creek, CA 94596.

On August 26, 2022, I served true copies of the following document described as:

PEREMPTORY CHALLENGE TO JUDICIAL OFFICER; DECLARATION OF DAVID C. CASARRUBIAS (Code Civ. Proc., § 170.6) on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address destebanez@hansonbridgett.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

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

Executed on August 26, 2022, at San Bruno, California.


Debbie Estebanez

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SERVICE LIST

NonHuman Rights Project, Inc., et al. v. FRESNO'S CHAFFEE ZOO CORPORATION, and JON FORREST DOHLIN, et al.

Fresno Superior Court, Case No. 22CECG02471

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