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FRESNO COUNTY SUPERIOR COURT  
BY \_\_\_\_\_ DEPUTY

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13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF FRESNO

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

*Petitioner,*

19 vs.

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

*Respondents.*

Case No.: 22CRWR686796

**PEREMPTORY CHALLENGE TO  
JUDICIAL OFFICER; DECLARATION OF  
MONICA L. MILLER (Code of Civ. Proc. §  
170.6)**

Judge: Gary R. Orozco  
Dept. 70

Location: 1100 Van Ness Avenue, Fresno, CA  
93724-0002

Date Action Filed: May 3, 2022  
Trial Date: unknown

26 by fax

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**DECLARATION OF MONICA L. MILLER**

I, Monica L. Miller, declare as follows:

1. I am an attorney duly admitted to practice before this Court. I am the attorney of record for Petitioner, Nonhuman Rights Project, Inc. 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 Gary R. Orozco, Department 70, for all purposes. The Honorable Gary R. Orozco is prejudiced against Petitioner or its attorneys, or the interest of the Petitioner or its attorneys, so that I believe Petitioner cannot have a fair and impartial trial or a hearing before Judge Orozco.

3. Wherefore, the undersigned attorney and Petitioner hereby move for peremptory disqualification of Judge Orozco 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 is 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 1st day of November 2022, at Novato, California

/s/ Monica Miller  
MONICA L. MILLER



1 [ ] (BY MAIL) I am readily familiar with the firm's practice of collection and  
2 processing correspondence by mailing. Under that practice it would be deposited with  
3 U.S. postal service on that same day with postage fully prepaid at Los Angeles,  
4 California in the ordinary course of business. I am aware that on motion of the party  
served, service is presumed invalid if postal cancellation date or postage meter date is  
more than one day after date of deposit for mailing in affidavit.

5 [X] (BY E-MAIL OR ELECTRONIC TRANSMISSION) I caused the documents to  
6 be sent on the date shown above to the email address(es) of the person(s) listed above.  
7 I did not receive within a reasonable time after the transmission any electronic  
message or other indication that the transaction was unsuccessful.

8 [ ] (BY PERSONAL DELIVERY) I delivered such documents by hand to the office of  
9 the addressee.

10 I declare under penalty of perjury under the laws of the State of California that the  
11 above is true and correct. Executed on November 1, 2022 at Los Angeles, California.

12  
13 Fernando Mercado  
14 PRINT NAME

  
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SIGNATURE