

COPY

No. H031658

IN THE COURT OF APPEAL OF THE STATE OF CALIFORNIA
SIXTH APPELLATE DISTRICT

COUNTY OF SANTA CLARA and PETER KUTRAS, JR.,
as the County Executive of the County of Santa Clara,
Petitioners,

vs.

SUPERIOR COURT OF THE STATE OF CALIFORNIA,
COUNTY OF SANTA CLARA,
Respondent.

CALIFORNIA FIRST AMENDMENT COALITION
Real Party in Interest.

Superior Court of the State of California,
County of Santa Clara Court Case No. 1-06-CV-072630
The Honorable James P. Kleinberg

**APPLICATION OF CALIFORNIA STATE ASSOCIATION OF COUNTIES
AND THE LEAGUE OF CALIFORNIA CITIES
FOR PERMISSION TO FILE AMICUS CURIAE BRIEF
AND AMICUS CURIAE BRIEF IN SUPPORT OF PETITIONERS**

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**APPLICATION OF THE CALIFORNIA STATE ASSOCIATION OF COUNTIES
AND THE LEAGUE OF CALIFORNIA CITIES FOR PERMISSION TO FILE
AMICUS CURIAE BRIEF IN SUPPORT OF PETITIONERS**

To the Honorable Conrad L. Rushing, Presiding Justice:

The League of California Cities and the California State Association of Counties respectfully apply for permission to file the attached *amicus curiae* brief in support of the petitioners.

The League of California Cities is an association of 478 California cities dedicated to protecting and restoring local control to provide for the public health, safety, and welfare of their residents, and to enhance the quality of life for all Californians. The League is advised by its Legal Advocacy Committee, which is comprised of 24 city attorneys from all regions of the State. The Committee monitors litigation of concern to municipalities, and identifies those cases that are of statewide—or nationwide—significance. The Committee has identified this case as being of such significance.

The California State Association of Counties (CSAC) is a non-profit corporation. The membership consists of all 58 California counties. CSAC sponsors a Litigation Coordination Program, which is administered by the County Counsel's Association of California and is overseen by the Association's Litigation Overview Committee, comprised of County Counsels throughout the state. The Litigation Overview Committee monitors litigation of concern to counties statewide and has determined that this case is a matter significantly affecting all counties.

The issues at stake in this case are of direct concern to *amici* and their members. *Amici* strongly support, and are deeply committed to the principles of openness in government that form the foundation of the California Public Records Act. At the same time, *amici's* members have a clear interest in this matter because a ruling that requires local governments to produce the components of a

