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8 Attorneys for Plaintiffs
9 MENDOCINO RAILWAY

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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION**

MENDOCINO RAILWAY, a California corporation,
Plaintiff

v.

JACK AINSWORTH, in his official capacity as
Executive Director of the California Coastal
Commission; CITY OF FORT BRAGG, a California
municipal corporation; and DOES 1 through 20,
inclusive,
Defendants.

Case No.: 4:22-cv-04597-JST

Assigned for all purposes to: Hon. John S. Tigar, Ctrm. 6

**PLAINTIFF’S REQUEST FOR
JUDICIAL NOTICE IN SUPPORT OF
ADMINISTRATIVE MOTION RE:
RELATED CASES**

Hearing Date: January 26, 2023
Hearing Time: 2:00 p.m.
Dept.: Courtroom 6
Judge: Hon. Jon S. Tigar

Complaint Filed: August 9, 2022

1 Pursuant to Federal Rule of Evidence Rule 201, Plaintiff Mendocino Railway requests that the
2 Court take judicial notice of the following Exhibits:

3 Exhibit A: Complaint of Plaintiff City of Fort Bragg in *City of Fort Bragg v. Mendocino*
4 *Railway*, Mendocino County Superior Court, Case No. 21CV00850 (hereinafter, the “*Fort*
5 *Bragg case*”).

6 Exhibit B: Complaint of Plaintiff California Coastal Commission in the *Fort Bragg case*.

7 Exhibit C: Mendocino Railway’s Notice of Removal filed in *California Coastal Commission v.*
8 *Mendocino Railway* (: 1:22-cv-06317).

9 Exhibit D: Court docket in *California Coastal Commission v. Mendocino Railway* (: 1:22-cv-
10 06317).

11 All exhibits are true and correct copies of court-filed documents. See Declaration of Paul Beard
12 II, ¶ 3. The Court may take judicial notice of court filings and other matters of public record. *Dignity*
13 *Health v. Dep’t of Indus. Rels.*, 445 F. Supp. 3d 491, 495 n.1 (N.D. Cal. 2020).

14 The exhibits are relevant to establishing the relatedness of the Removed Action and the present
15 action.

16 For all these reasons, the Court should grant Plaintiff’s request and judicially notice Exhibit 1.

17 DATED: October 31, 2022

FISHERBROYLES LLP

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19 s/ Paul Beard II

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21 Attorneys for Plaintiff MENDOCINO RAILWAY
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