

DAVID CHIU, State Bar #189542
City Attorney
JENNIFER E. CHOI, State Bar #184058
Chief Trial Deputy
ZUZANA S. IKELS, State Bar # 208671
Deputy City Attorney
Fox Plaza
1390 Market Street, Sixth Floor
San Francisco, California 94102-5408
Telephone: (415) 335-3307
Facsimile: (415) 554-3837
E-Mail: Zuzana.Ikels@sfcityatty.org

Attorneys for Defendants
MAYOR LONDON BREED,
DIRECTOR SHIREEN MCSPADDEN and
CITY AND COUNTY OF SAN FRANCISCO

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

UNLIMITED JURISDICTION

RAMONA MAYON,

Plaintiff,

vs.

MAYOR LONDON BREED AND
DIRECTOR SHIREEN MCSPADDEN OF
DEPT OF HOMELESSNESS AND
SUPPORTIVE HOUSING OF CITY AND
COUNTY OF SAN FRANCISCO, ONLY IN
THEIR OFFICIAL CAPACITY, AND DOES
1-50,

Defendants.

Case No. CGC-24-611907

**DEFENDANTS' REPLY BRIEF AND NOTICE
OF NON-OPPOSITION TO AMENDED
DEMURRER TO COMPLAINT**

Hearing Date: May 29, 2024
Time: 9:30 a.m.
Place: Dept. 302

Date Action Filed: January 26, 2024
Trial Date: Not Set.

Defendants Mayor London Breed, Director Shireen McSpadden of Dept of Homelessness and Supportive Housing of City and County of San Francisco (the "City Defendants") hereby informs this Court that Defendants filed and served, by email and U.S. mail, their Amended Demurrer to Plaintiff's Complaint, on April 24, 2024. A true and correct copy of the email, confirming receipt by

1 Plaintiff Ramona Mayon, is attached hereto as **Exhibit A**. Defendants were not served an Opposition
2 by Plaintiff Ramona Mayon to Defendant's Amended Demurrer. Plaintiff's Opposition was due, at the
3 latest, on May 15, 2024. The Court's Docket also reflects that no Opposition was filed with the Court.
4 Because Plaintiff has failed to file any opposition to the Demurrer, the City Defendants move this
5 Court for an order sustaining its Demurrer to Plaintiff's Complaint, for the reasons set forth in the City
6 Defendants' moving papers, without leave to amend and for other such relief as the court deems
7 proper.

8
9 Dated: May 21, 2024

10 DAVID CHIU
11 City Attorney
12 JENNIFER E. CHOI
13 Chief Trial Deputy
14 ZUZANA S. IKELS
15 Deputy City Attorney

16 By: /s/ Zuzana S. Ikels
17 ZUZANA S. IKELS

18 Attorneys for Defendant(s)
19 MAYOR LONDON BREED,
20 DIRECTOR SHIREEN MCSPADDEN
21
22
23
24
25
26
27
28

PROOF OF SERVICE

I, KASSY ADAMS, declare as follows:

I am a citizen of the United States, over the age of eighteen years and not a party to the above-entitled action. I am employed at the City Attorney's Office of San Francisco, Fox Plaza Building, 1390 Market Street, Sixth Floor, San Francisco, CA 94102.

On May 21, 2024, I served the following document(s):

DEFENDANTS' REPLY BRIEF AND NOTICE OF NO OPPOSITION FILED TO AMENDED DEMURRER TO COMPLAINT

on the following persons at the locations specified:

Ramona Mayon
1559 Sloat Blvd, Suite B-Box 175,
San Francisco, California 94132
ramonamayon@yahoo.com
telephone: 415-595-6308

Plaintiff in Pro Per

in the manner indicated below:

☒ **BY UNITED STATES MAIL:** Following ordinary business practices, I sealed true and correct copies of the above documents in addressed envelope(s) and placed them at my workplace for collection and mailing with the United States Postal Service. I am readily familiar with the practices of the San Francisco City Attorney's Office for collecting and processing mail. In the ordinary course of business, the sealed envelope(s) that I placed for collection would be deposited, postage prepaid, with the United States Postal Service that same day.

☒ **BY ELECTRONIC MAIL:** Based on a court order or an agreement of the parties to accept electronic service, I caused the documents to be served electronically through File & ServeXpress in portable document format ("PDF") Adobe Acrobat.

☒ **BY ELECTRONIC MAIL:** I caused a copy of such document to be transmitted *via* electronic mail in portable document format ("PDF") Adobe Acrobat from the electronic address: kassy.adams@sfcityatty.org.

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

Executed May 21, 2024, at San Francisco, California.

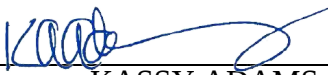

KASSY ADAMS

EXHIBIT A

Ikels, Zuzana (CAT)

From: Ramona Mayon <ramonamayon@yahoo.com>
Sent: Friday, April 26, 2024 11:26 AM
To: Ikels, Zuzana (CAT)
Cc: Adams, Kassy (CAT)
Subject: Re: Mayon v CCSF

Thank you. Yes, that's fine.

-R

On Friday, April 26, 2024 at 10:11:05 AM PDT, Ikels, Zuzana (CAT) <zuzana.ikels@sfcityatty.org> wrote:

Dear Ramona,

Attached is a courtesy copy of the demurrer we filed on April 24, 2024. We served you also by mail. Normally, both sides agree to service by email. Could we do that here, including you emailing the opposition you file?

Thank you and have a nice weekend.

Best,

Zuzana



Zuzana S. Ikels

Deputy City Attorney

Office of City Attorney David Chiu

(415) 355-3307

www.sfcityattorney.org