

DAVID LOY, Cal. Bar No. 229235
AARON R. FIELD, Cal. Bar No. 310648
FIRST AMENDMENT COALITION
534 4th Street, Suite B
San Rafael, CA 94901-3334
Telephone: 415.460.5060
Email: dloy@firstamendmentcoalition.org
afield@firstamendmentcoalition.org

ELECTRONICALLY FILED
Superior Court of California,
County of Solano
01/23/2026 at 08:22:28 PM
By: K. Schoenberg, Deputy Clerk

\$60.00

Attorneys for Petitioner VALLEJO SUN LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SOLANO

VALLEJO SUN LLC,

Petitioner,

v.

CITY OF VALLEJO,

Respondent.

Case No. CU25-10261

**NOTICE OF MOTION AND MOTION
FOR JUDGMENT GRANTING PETITION
FOR DECLARATORY RELIEF AND
WRIT OF MANDATE**

Date: April 29, 2026

Time: 10:00 a.m.

Dept: 3

Judge: Hon. Stephen Gizzi



Action filed: November 5, 2025

TO THE COURT, ALL PARTIES, AND ALL COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on April 29, 2026, at 10:00 am, in Department 3 of the Solano County Superior Court, at 600 Union Ave., Fairfield, California 94533, before the Honorable Stephen Gizzi, petitioner Vallejo Sun LLC will and hereby does move for an order granting its Verified Petition for Declaratory Relief and Writ of Mandate under the California Public Records Act (“the Petition”).

Specifically, petitioner moves the Court for (1) a writ of mandate, order, and judgment in favor of petitioner and against respondent City of Vallejo granting the Petition in full and directing the City to disclose all records called for by the Public Records Act request set forth in **Exhibit 1** to the Petition and (2) a judicial declaration that by withholding records responsive to the Public Records Act request set forth in **Exhibit 1** to the Petition, the City violated the Public

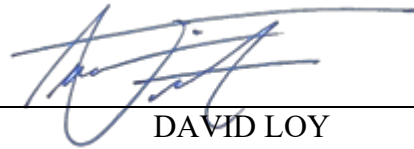
1 Records Act, Gov. Code §§ 7920.000 et seq., Government Code section 7923.625, and Article I,
2 section 3(b) of the California Constitution. The requested records are subject to and not exempt
3 from the presumption of access enshrined in the Public Records Act, Gov. Code §§ 7920.000 et
4 seq., Government Code section 7923.625, and Article I, section 3(b) of the California
5 Constitution, and respondent's withholding of the requested records was and is inconsistent with
6 these laws.

7 This Motion is based on this Notice, petitioner's Memorandum of Points and Authorities in
8 support, the declaration of Aaron R. Field in support, the declaration of Scott Morris in support,
9 the Request for Judicial Notice in support, the anticipated Reply in support, all pleadings, records,
10 and files in this action, and all other evidence and argument that may be received by the Court
11 before, at, or in connection with the hearing on this Motion.

12 Dated: January 23, 2026

13 FIRST AMENDMENT COALITION

14
15 By



16 DAVID LOY
AARON R. FIELD

17 Attorneys for Petitioner FIRST
18 AMENDMENT COALITION
19
20
21
22
23
24
25
26
27
28

- 1
- 2
- 3
- 4
- 5
- 6
- 7
- 8
- 9
- 10
- 11
- 12
- 13
- 14
- 15
- 16
- 17
- 18
- 19
- 20
- 21
- 22
- 23
- 24
- 25
- 26
- 27
- 28

On January 23, 2026, I served true copies of the following document(s) described as **NOTICE OF MOTION AND MOTION FOR JUDGMENT GRANTING PETITION FOR DECLARATORY RELIEF AND WRIT OF MANDATE** on the interested parties in this action as follows:

BY E-MAIL OR ELECTRONIC TRANSMISSION: I caused a copy of the document(s) to be sent from e-mail address rregnier@firstamendmentcoalition.org 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.


Robin P. Regnier