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 Superior Court of California,
 County of Solano
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9 Attorneys for Petitioner VALLEJO SUN LLC
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA

9 COUNTY OF SOLANO
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VALLEJO SUN LLC,

Case No. CU25-10261

Petitioner,

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

v.

CITY OF VALLEJO,

Respondent.

Date: April 29, 2026

Time: 10:00 a.m.

Dept: 3

Judge: Hon. Stephen Gizzi

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Action filed: November 5, 2025

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

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

24 Specifically, petitioner moves the Court for (1) a writ of mandate, order, and judgment in
 25 favor of petitioner and against respondent City of Vallejo granting the Petition in full and
 26 directing the City to disclose all records called for by the Public Records Act request set forth in
 27 **Exhibit 1** to the Petition and (2) a judicial declaration that by withholding records responsive to
 28 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

FIRST AMENDMENT COALITION

By

DAVID LOY
AARON R. FIELD
Attorneys for Petitioner FIRS
AMENDMENT COALITION

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Marin, State of California. My business address is 534 4th Street, Suite B, San Rafael, CA 94901-3334.

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:

7 Katelyn M. Knight, Assistant City Attorney
Kristoffer S. Jacob, Assistant City Attorney
8 Sukhnandan Nijjar, Deputy City Attorney
CITY OF VALLEJO, City Hall
555 Santa Clara Street, 3rd Floor
9 Vallejo, CA 94590
10 Email: katelyn.knight@cityofvallejo.net;
Sarah.Chesser@cityofvallejo.net

11 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the
12 document(s) to be sent from e-mail address rregnier@firstamendmentcoalition.org to the persons
13 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.

14 I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on January 23, 2026, at East Palo Alto, California.

Robin P. Regnier
Robin P. Regnier