

de Castro, P.C.

Attorneys & Counselors

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City of National City

VIA ELECTRONIC MAIL AND U.S. MAIL

November 29, 2021

City of National City
Charles Bell, City Attorney
1243 National City Boulevard
National City, CA 91950

Alena Shamos, Esq.
Aleks R. Giragosian, Esq.
Colantuono, Highsmith & Whatley, PC
440 Stevens Avenue, Suite 200
Solana Beach, CA 92075

Re: Further Notice of Violation of California Voting Rights Act of 2001

Counsel,

This letter is in furtherance of the November 8, 2021 notice sent to the National City Clerk pursuant to California Elections Code §10010(e)(1). As we previously stated, we represent several residents (and communities-of-interest in the City), including the prospective plaintiffs, Ms. Ditas Yamane and Ms. Florfina Arce. They are residents of National City.

As the City's at-large election system violates the California Voting Rights Act of 2001 ("CVRA"), the plaintiffs have demanded the City adopt a resolution within 45 days outlining its intention to transition from at-large to district-based elections in accordance with Cal. Elec. Code §10010(e)(3)(a). The 45 day period ends December 23, 2021.

While counsel have had preliminary discussions about the possibility of stipulating to an extension beyond the first 45 day period, no such stipulations have been entered into. Until that occurs, the City should consider taking progressive steps toward adopting a resolution in case the parties are unable to agree. Otherwise, the prospective plaintiffs will be prepared to seek injunctive relief and take other actions shortly after the expiration of the statutory deadline.

I am hoping there can be more progress within the next week so that neither of our clients will be placed in a time sensitive position as the deadline approaches.

City Attorney, City of National City, et. al.
November 30, 2021, continued

If you have any questions, please let me know.

Sincerely,



Audie J. de Castro
DE CASTRO, P.C.

cc: City Clerk, National City