

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

Adrianna E. Guzman, Bar No. 188812  
aguzman@lcwlegal.com  
LIEBERT CASSIDY WHITMORE  
A Professional Law Corporation  
6033 West Century Boulevard, 5th Floor  
Los Angeles, California 90045  
Telephone: 310.981.2000  
Facsimile: 310.337.0837

Attorneys for Respondent  
COUNTY OF ORANGE

STATE OF CALIFORNIA  
PUBLIC EMPLOYMENT RELATIONS BOARD

ORANGE COUNTY ATTORNEYS  
ASSOCIATION,

Charging Party,

v.

COUNTY OF ORANGE,

Respondent.

PERB Case No.: LA-CE-814-M

**ANSWER TO COMPLAINT**

Respondent COUNTY OF ORANGE admits, denies, and affirmatively alleges the following in response to the Complaint:

1. Respondent admits the allegations set forth in paragraph 1 of the Complaint.
2. Respondent admits the allegations set forth in paragraph 2 of the Complaint.
3. Respondent admits the allegations set forth paragraph 3 of the Complaint.
4. Respondent denies generally and specifically each and every allegation and/or implication in paragraph 4 of the Complaint.
5. Respondent denies generally and specifically each and every allegation and/or implication in paragraph 5 of the Complaint.

//

Liebert Cassidy Whitmore  
A Professional Law Corporation  
6033 West Century Boulevard, 5th Floor  
Los Angeles, California 90045



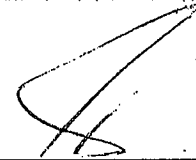
Liebert Cassidy Whitmore  
A Professional Law Corporation  
6033 West Century Boulevard, 5th Floor  
Los Angeles, California 90045

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

4. For such other and further relief as PERB deems just and proper.

Dated: May 3, 2013

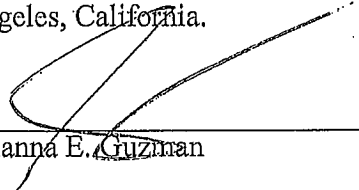
Respectfully submitted,  
LIEBERT CASSIDY WHITMORE

By:   
Adrianna E. Guzman  
Attorneys for Respondent  
COUNTY OF ORANGE

DECLARATION

I declare under penalty of perjury that this Answer is true and complete to the best of my knowledge and belief.

Executed this 3rd day of May 2013, at Los Angeles, California.

  
\_\_\_\_\_  
Adrianna E. Cruzman

Liebert Cassidy Whitmore  
A Professional Law Corporation  
6033 West Century Boulevard, 5th Floor  
Los Angeles, California 90045

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

Liebert Cassidy Whitmore  
A Professional Law Corporation  
6033 West Century Boulevard, 5th Floor  
Los Angeles, California 90045

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: **6033 West Century Boulevard, 5th Floor, Los Angeles, California 90045.**

On **May 6, 2013**, I served the foregoing document(s) described as **ANSWER TO COMPLAINT** in the manner checked below on all interested parties in this action addressed as follows:

BY FAX & U.S. MAIL

James Coffey  
Regional Attorney  
Public Employment Relations Board  
Sacramento Regional Office  
1031 18th Street  
Sacramento, CA 95811  
Fax: 916-327-6377

BY U. S. MAIL ONLY

Marianne Reinhold  
Reich, Adell & Cvitan, LLP  
2670 North Main Street  
Suite 300  
Santa Ana, CA 92705

- (BY U.S. MAIL) I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.
- (BY FACSIMILE) I am personally and readily familiar with the business practice of Liebert Cassidy Whitmore for collection and processing of document(s) to be transmitted by facsimile. I arranged for the above-entitled document(s) to be sent by facsimile from facsimile number 310.337.0837 to the facsimile number(s) listed above. The facsimile machine I used complied with the applicable rules of court. Pursuant to the applicable rules, I caused the machine to print a transmission record of the transmission, to the above facsimile number(s) and no error was reported by the machine. A copy of this transmission is attached hereto.

Executed on **May 6, 2013**, at Los Angeles, California.

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

  
\_\_\_\_\_  
Erlinda Bernabe