

1 Francis X. Hardiman Bar #140504
Margaret M. Cahill Bar #138231

2 HARDIMAN & CAHILL
3 Attorneys at Law
1500 Brookhollow
4 Suite 114
SANTA ANA, CALIFORNIA 92705
(714) 556-2233
5 Facsimile (714) 556-5223

6 Attorneys for: Richard S. et al.

Richard S. v. Dept. of Developmental Serv. of Cal.



MR-CA-004-009

7
8 UNITED STATES DISTRICT COURT

9 FOR THE CENTRAL DISTRICT OF CALIFORNIA

10
11 RICHARD S., CYNTHIA R., VALDINA)
R., and ROES 1 through 800,)
12 individually and on behalf of all)
those similarly situated by)
13 WILLIAM CABLE, M.D. as Guardian)
ad Litem)

14 Plaintiffs,)

15 vs.)

16 DEPARTMENT OF DEVELOPMENTAL)
SERVICES OF THE STATE OF)
17 CALIFORNIA, FAIRVIEW)
DEVELOPMENTAL CENTER, SOUTH)
18 COAST REGIONAL PROJECT, HARBOR)
REGIONAL CENTER, REGIONAL CENTER)
19 OF ORANGE COUNTY, SAN DIEGO)
REGIONAL CENTER, SOUTH CENTRAL)
20 LOS ANGELES REGIONAL CENTER,)
WESTSIDE REGIONAL CENTER, DENNIS)
21 G. AMUNDSON, as Director of the)
DEPARTMENT OF DEVELOPMENTAL)
22 SERVICES STATE OF CALIFORNIA,)
HUGH KOHLER, as Executive)
23 Director of FAIRVIEW)
DEVELOPMENTAL CENTER, LILIA TAN)
24 FIGUEROA, M.D., as Medical)
Director of FAIRVIEW)
25 DEVELOPMENTAL CENTER, DAWN)
LEMONDS as director of SOUTH)
26 COAST REGIONAL PROJECT, and Does)
1 through 500, inclusive,)

27 Defendants)
28

CASE NO:

NOTICE OF APPLICATION RE:
APPLICATION FOR TRO AND
PRELIMINARY INJUNCTION,
DECLARATION OF FRANCIS X.
HARDIMAN

[Local Rule 7.18.1]

Date: March 20, 1997
Time: 10:00 a.m.
Place: Federal District
Court, Santa Ana, California

1 I, FRANCIS X. HARDIMAN, declare:

2 1. That I am an attorney of record for Plaintiffs in this
3 action.

4 2. That the facts asserted herein are of my own personal
5 knowledge and that if called upon to testify in a court of law I
6 would and could testify to the following:

7 3. That on March 19, 1997, I made the following efforts
8 to contact all adverse parties and their known attorneys as
9 follows:

10 4. That at 10:55 a.m. I contacted Tom Scheere, Esq. of
11 the California Attorney Generals office in Los Angeles who
12 represents the Department of Developmental Services in the
13 related of action of Cable v. DDS Case no. SACV96 1190 GLT
14 (EEX). I advised Mr. Scheere that we were filing a related
15 action and Application for TRO on March, 20, 1997 in this Court.
16 Mr. Scheere advised me to contact the Department of
17 Developmental Services ("DDS").

18 5. At or about 11:35 I received a telephone call in
19 response to my earlier call to the DDS. I spoke with Susan
20 Geanacou, Esq. attorney representing the DDS. I advised her
21 that I was notifying her pursuant to Local Rule 7.18.1. that
22 Plaintiffs would seek a Temporary Restraining Order and
23 Preliminary Injunction in the Federal District Court, Santa Ana,
24 on Thursday, March, 20, 1997 at 10:00 a.m. I identified the
25 Plaintiffs and Defendants and advised her that Dr. Cable was
26 filing an application to be appointed as Guardian ad Litem for
27 purposes of this action. I told her that the parents of
28 "Richard S." had been contacted and were not opposed to I

1 identified the Causes of Action as Violations of Title II and V
2 of the Americans with Disabilities Act ("ADA")

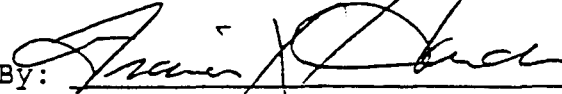
3 2. I was informed that Tom Nixon, Esq., Woodruff,
4 Spradlin & Smart, 701 S. Parker St., Suite 7000, Orange, CA 92868
5 Tel: 714/558/7000 would be representing Regional Center of
6 Orange County.

7 3. Bob Rubin, Esq., BRUMER, RUBIN & WESTON, 3600 Wilshire
8 Blvd., Suite 1120, Los Angeles, CA 90010, 213/487/7800, might
9 be representing San Diego Regional Center.

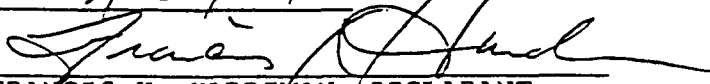
10 4. I contacted all Defendants at least twice on march 19,
11 1997. No others would confirm attorney representation.

12 Dated: March 20, 1997,

HARDIMAN & CAHILL
A Professional Corporation

13 BY: 
14 FRANCIS X. HARDIMAN
15 Attorney for Plaintiffs

16 I declare under penalty of perjury under the laws of
17 the State of California and of the United States that the
18 foregoing is true and correct

19 Executed on: 3/20/97

20 FRANCIS X. HARDIMAN, DECLARANT
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