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MATTHEW BOSCHETTO; ALBERT CHOW;  
7 LISA ARJES and LIVABLESF, INC.

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF SAN FRANCISCO

11 MATTHEW BOSCHETTO; ALBERT CHOW;  
LISA ARJES AND LIVABLESF, INC,

12 Petitioners/Plaintiffs,

13 vs.

14 CITY AND COUNTY OF SAN FRANCISCO;  
15 SAN FRANCISCO BOARD OF  
SUPERVISORS; SAN FRANCISCO  
16 DEPARTMENT OF RECREATION AND  
PARKS; and DOES 1-10,

17 Defendants/Respondents.

18 vs.

19 SUPERVISOR JOEL ENGARDIO;  
20 SUPERVISOR MYRNA MELGAR;  
21 (FORMER) SUPERVISOR DEAN PRESTON;  
22 SUPERVISOR RAFAEL MANDELMAN;  
AND SUPERVISOR MATT DORSEY IN  
23 THEIR CAPACITY AS PROPONENTS OF  
PROPOSITION K,

24 Real Parties in Interest.

Unlimited Jurisdiction  
Case No

Judge:

**VERIFIED PETITION FOR WRIT OF  
MANDATE AND COMPLAINT FOR  
INJUNCTIVE AND DECLARATORY  
RELIEF**

CEQA CASE

(Cal. Code Civ. Proc. sections 525, 526, 1060,  
1085 & 1094.5; Cal. Veh. Code sections 21 &  
21101; Cal. Pub. Recs. Code sections 21168 &  
21168.5.)

Date Action Filed:  
Trial Date:

1 The plaintiffs in this action are committed stakeholders dedicated to preserving and  
2 enhancing the quality of life in San Francisco neighborhoods. They believe in the principles of  
3 representative government, recognizing that political power resides with the people through their  
4 elected officials. Their trust in these leaders is founded on the expectation that those elected will  
5 faithfully and transparently represent their constituents. Equally, the plaintiffs insist that all  
6 government actions strictly adhere to the rule of law.

7 The effects of Proposition K will be to displace longtime residents, merchants, visitors, and  
8 daily commuters. Proposition K advances exclusionary public policies of limited benefit, and  
9 compromises the safety, accessibility, and overall well-being of the entire Bay Area. It effectively  
10 denies people equitable access to public roads, safe transportation, and a livable environment.

11 Petitioners bring this matter before the court because they believe in the rule of law. They  
12 cannot stand by while harmful, unlawful public policies are enacted.

13 **INTRODUCTION**

14 1. Petitioner and Plaintiffs Matthew Boschetto, Albert Chow, Lisa Arjes, and Livable  
15 SF (“Petitioners”) bring this action to challenge the legality of the “Permanently Closing the  
16 Upper Great Highway to Private Vehicles to Establish a Public Open Recreation Space” measure  
17 (“Proposition K”). Proposition K was placed on the November 5, 2024 City and County of San  
18 Francisco (the “City” or “San Francisco”) ballot by five members of the Respondent and  
19 Defendant San Francisco Board of Supervisors (the “Board”).

20 2. Petitioners assert that Proposition K is legally invalid because: (1) the State of  
21 California has preempted the field of traffic control and roads, and state law precludes local voters  
22 from acting to close a public street (Cal. Veh. Code section 21(a)); (2) Proposition K effects a  
23 “partial” closure of the Upper Great Highway in violation of Vehicle Code section 21101(a)(1);  
24 and (3) Proposition K violates mandatory provisions of the California Environmental Quality Act  
25 (“CEQA”) requiring the City to consider and mitigate the potential environmental impacts of  
26 closing the Upper Great Highway to most traffic (Cal. Pub. Res. (“PRC”) Code sections 2100 et  
27 seq.).

28 ///



1 duty to invalidate an illegal measure, even after an election. (See, e.g., Citizens for Jobs and the  
2 Economy v. County of Orange (2002) 94 Cal.App.4th 1311 [trial court invalidated ballot measure  
3 after election and court of appeal affirmed].)

4 **PARTIES**

5 8. Petitioner/Plaintiff Matthew Boschetto is a resident, taxpayer and vehicle owner in  
6 the Miraloma Park neighborhood.

7 9. Petitioner/Plaintiff Albert Chow is a resident, taxpayer and vehicle owner in San  
8 Francisco's Sunset District, the location of the Upper Great Highway.

9 10. Petitioner/Plaintiff Lisa Arjes is a resident, taxpayer and vehicle owner in San  
10 Francisco's Sunset District, the location of the Upper Great Highway.

11 11. Petitioner/Plaintiff Livable SF, Inc. is a nonprofit corporation registered with the  
12 California Secretary of State and set up to promote sustainable transportation solutions in San  
13 Francisco.

14 12. Respondent/Defendant City is a municipal government governed by the laws of the  
15 State of California, the San Francisco Charter ("Charter"), and the laws of San Francisco.

16 13. Respondent/Defendant Board is the elected decision-making body of the City, five  
17 members of which independently placed Proposition K on the ballot.

18 14. Respondent and Defendant Rec. & Park is the City department taking the lead on  
19 the closure of the Upper Great highway.

20 15. Real Parties in Interest Supervisors Joel Engardio, Supervisor Myrna Melgar,  
21 (former) Supervisor Dean Preston, Supervisor Rafael Mandelman, and Supervisor Matt Dorsey  
22 were or are members of the Board and were the proponents of Proposition K.

23 16. The true identities and capacities of Respondent Does 1 through 10 are unknown to  
24 Petitioners at this time. Petitioners are informed and believe, and based upon such information  
25 and belief allege, that each of the fictitiously named respondents is in some manner responsible for  
26 the actions described in this Petition. When the true identities and capacities of these respondents  
27 have been determined, Petitioners will seek leave to amend this Petition/Complaint to insert such  
28 identities and capacities.

1 **JURISDICTION AND VENUE**

2 17. The wrongful conduct alleged herein occurred in San Francisco, California. This  
3 Court has jurisdiction over the subject matter of this action, and venue is properly in this Court.

4 **STATEMENT OF FACTS**

5 18. The Great Highway is a major thoroughfare running along Ocean Beach in San  
6 Francisco’s Sunset and Richmond Districts, between Golden Gate Park to the north and Skyline  
7 Boulevard to the South. The main vehicle road (and the subject of this Petition) is known as the  
8 “Upper Great Highway.” The trail and frontage road located directly east of the Upper Great  
9 Highway is known as the “Lower Great Highway.”

10 19. On June 18, 2024, the Proponents submitted Proposition K (although it had not yet  
11 been assigned a measure letter) for inclusion on the November ballot pursuant to Charter section  
12 2.113. Proposition K sought to permanently close the Upper Great Highway to most vehicles,  
13 while allowing other vehicular traffic to continue to travel on the road. While the ostensible  
14 purpose of the measure was to allow the City to use the area for a public park, Proposition K does  
15 not provide any funding for such a park.

16 20. The official ballot digest prepared by the City’s Ballot Simplification Committee  
17 confirms that Proposition K only effectuates a partial closure of the Upper Great Highway, stating  
18 that “It would continue to allow emergency vehicles, official government vehicles, intrapark  
19 transit shuttle buses and similar authorized vehicles to access the Upper Great Highway at all  
20 times.”

21 21. On June 18, 2024, the Board President assigned the measure to the Board’s Rules  
22 Committee pursuant to Charter section 2.113(b).

23 22. On July 15, 2024, the Rules Committee held a hearing on the measure pursuant to  
24 Charter section 2.113(b).

25 23. On this same date, the Planning Department issued a memorandum regarding  
26 Proposition K which erroneously asserted that “CEQA does not apply to a measure submitted to  
27 the voters by the Mayor or 5 Supervisors.” The City therefore did not undertake any CEQA  
28 process in connection with Proposition K.



1           31.       CCP section 526 provides that an injunction may be granted “[w]hen it appears by  
2 the complaint that the plaintiff is entitled to the relief demanded, and the relief, or any part thereof,  
3 consists in restraining the commission or continuance of the act complained of, either for a limited  
4 period or perpetually;” “[w]hen it appears by the complaint or affidavits that the commission or  
5 continuance of some act during the litigation would produce waste, or great or irreparable injury,  
6 to a party to the action;” or “[w]hen it appears, during the litigation, that a party to the action is  
7 doing, or threatens, or is about to do, or is procuring or suffering to be done, some act in violation  
8 of the rights of another party to the action respecting the subject of the action, and tending to  
9 render the judgment ineffectual.”

10           32.       In the absence of this Court’s injunction, Respondents will give legal effect to  
11 Proposition K, thereby causing Petitioners, residents of the Sunset District, residents elsewhere in  
12 the City, Bay Area residents travelling through San Francisco, and visitors to the City to suffer  
13 irreparable harm for which there is no adequate remedy at law.

14           33.       Because Proposition K is legally invalid, Petitioners are entitled to temporary,  
15 preliminary, and permanent injunctive relief compelling Respondents not to take any action that  
16 would give legal effect to Proposition K.

17           34.       Petitioners do not have a plain, speedy, or adequate remedy in the ordinary course  
18 of law in that no damages or other legal remedy can adequately compensate Petitioners, the  
19 residents of the Sunset District, residents elsewhere in the City, Bay Area residents travelling  
20 through San Francisco, and visitors for the irreparable harm they will suffer as a result of  
21 Proposition K being given legal effect. Accordingly, Petitioners are entitled to injunctive relief as  
22 requested herein.

### **Declaratory Relief**

24           35.       Pursuant to CCP section 1060, “[a]ny person...who desires a declaration of his or  
25 her rights or duties with respect to another... may, in cases of actual controversy relating to the  
26 legal rights and duties of the respective parties, bring an original action ... in the superior court for  
27 a declaration of his or her rights and duties.... He or she may ask for a declaration of rights or  
28 duties, either alone or with other relief; and the court may make a binding declaration of these

1 rights or duties, whether or not further relief is or could be claimed at the time. The declaration  
2 may be either affirmative or negative in form and effect, and the declaration shall have the force of  
3 a final judgment. The declaration may be had before there has been any breach of the obligation  
4 in respect to which said declaration is sought.”

5 36. In the absence of this Court’s declaration regarding Proposition K’s legal  
6 invalidity, Respondents will give legal effect to Proposition K, thereby causing Petitioners, the  
7 residents of the Sunset District, residents elsewhere in the City, Bay Area residents travelling  
8 through San Francisco, and visitors to the City to suffer irreparable harm for which there is no  
9 adequate remedy at law.

10 37. Because Proposition K is legally invalid, Petitioners are entitled to a declaration  
11 stating this, so that Respondents will not take any action that would give legal effect to Proposition  
12 K.

13 38. Petitioners do not have a plain, speedy, or adequate remedy in the ordinary course  
14 of law in that no damages or other legal remedy can adequately compensate Petitioners, the  
15 residents of the Sunset District, residents elsewhere in the City, Bay Area residents travelling  
16 through San Francisco, and visitors to the City for the irreparable harm they will suffer as a result  
17 of Respondents giving legal effect to Proposition K. Accordingly, Petitioners are entitled to  
18 declaratory relief as requested herein.

19 **APPLICABLE SUBSTANTIVE LAW**

20 **San Francisco Law**

21 39. Charter section 2.113 permits four or more members of the Board to submit a  
22 measure to the voters. This provision is unique because it refers to such a measure as an  
23 “initiative measure” even though it does not require any signatures from registered voters in order  
24 to be placed on the ballot. Further, this provision is distinct from measures sponsored by the full  
25 Board because four Supervisors acting alone may place such a measure on the ballot without a  
26 majority vote (or any vote) of the Board. Upon information and belief, San Francisco is the only  
27 county in the state which allows a measure to be placed on the ballot by the independent action of  
28 less than a majority of its board of supervisors.



1                                   **The State Has Preempted the Field of Traffic Control and Roads**

2           40.     Where the state has granted itself plenary authority over a certain field, local voters  
3 are precluded from exercising their initiative power with respect to that field. As relevant here, the  
4 text of Vehicle Code section 21(a) explicitly provides that the state has preempted the entire field  
5 of traffic control and roads:

6                   “Except as otherwise expressly provided, the provisions of this code are  
7 applicable and uniform throughout the state and in all counties and municipalities  
8 therein, and a local authority shall not enact or enforce any ordinance or  
9 resolution on the matters covered by this code, including ordinances or resolutions  
10 that establish regulations or procedures for, or assess a fine, penalty, assessment,  
11 or fee for a violation of, matters covered by this code, unless expressly authorized  
12 by this code.”

13 Thus, the voters have no authority to close a public highway to vehicular traffic.

14           41.     While the local electorate’s right to legislate by initiative is guaranteed by Article  
15 II, section 11 of the California Constitution, this right is not absolute. Absent an express  
16 delegation of authority to a local legislative body, a city or county may not regulate or enact any  
17 ordinances which infringe on the state’s plenary power over traffic control and roads.

18           42.     Further, while the Legislature has expressly delegated some limited authority to  
19 enact ordinances related to traffic control and roads to local legislative bodies, that does not mean  
20 the voters are permitted to exercise such authority. While a generic reference to “legislative body”  
21 in a state statute may support the conclusion that the Legislature did not intend to preclude action  
22 by local initiative, such a reference in a statute that addresses a matter of statewide concern  
23 indicates that the Legislature intended to preclude action by local initiative. (See, e.g., Committee  
24 of Seven Thousand v. Superior Court (1988) 45 Cal.3d 491, 501 [“[A]n intent to exclude ballot  
25 measures is more readily inferred if the statute addresses a matter of statewide concern rather than  
26 a purely municipal affair.”]; Wiltshire v. Superior Court (1985) 172 Cal. App. 3d 296 [local  
27 initiative regarding solid waste management is prohibited because topic is matter of statewide  
28 concern].)

          43.     Notably, traffic control and roads are matters of statewide concern pursuant to  
Vehicle Code section 21(a). California law permits a local legislative body to close a highway to  
vehicular traffic only when the legislative body enacts an ordinance or resolution and makes a

1 finding that “in the opinion of the legislative body,” the highway is “no longer needed for  
2 vehicular traffic.” (Cal. Veh. Code section 21101(a)(1).)

3 44. The State clearly has an interest in ensuring uniform rules for drivers across the  
4 state and highways and roads are clearly of a regional nature. Upon information and belief, the  
5 Upper Great Highway is regularly used by not only residents of the Sunset District, but also  
6 residents from elsewhere in the City, residents of other Bay Area counties travelling through the  
7 City, and visitors. Thus, Proposition K was unlawfully put before the City’s voters because it  
8 pertains to a matter of statewide concern.

9 **The State Vehicle Code Does Not Permit “Partial” Closures**

10 45. In interpreting the provisions of the Vehicle Code, “delegations of power to cities  
11 regarding vehicular traffic will be strictly construed.” (Rumford v. City of Berkeley (1982) 31  
12 Cal.3d 545 [emphasis added; see also City of Poway v. City of San Diego (1991) 229 Cal.App.3d  
13 847; City of Lafayette v. County of Contra Costa (1979) 91 Cal.App.3d 749.)

14 46. Vehicle Code section 21101(a)(1) permits a locality to close a highway to vehicles  
15 only when the local legislative body enacts an ordinance and makes a finding that the highway is  
16 “[n]o longer needed for vehicular traffic.”

17 47. Although Proposition K purports to rely on Vehicle Code section 21101(a)(1), that  
18 statute does not authorize streets to be “partially closed or, more precisely, closed to some  
19 vehicular traffic.” (Rumford v. City of Berkeley (1982) 31 Cal.3d 545, 554.) On its face,  
20 Proposition K is an improper partial closure because it explicitly allows transit vehicles,  
21 emergency vehicles, official government vehicles, and other authorized vehicles to continue  
22 driving on the Upper Great Highway. These exemptions directly contradict the finding pursuant  
23 to Vehicle Code section 21101(a)(1) that the Upper Great Highway is “[n]o longer needed for  
24 vehicular traffic.” In other words, by allowing other vehicular traffic to continue to travel on the  
25 Upper Great Highway, Proposition K inherently acknowledges that the road is still needed for  
26 vehicular traffic.

27 48. Thus, Vehicle Code section 21101(a)(1) does not allow a city to close a road “to  
28 some vehicular traffic even though it be needed for other such traffic.” (Lafayette, supra at 756.)

**Proposition K is a Project Subject to CEQA**

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2           49.     State law mandates that the government must study the environmental impacts of  
3 all “projects.” (PRC section 21080(d).) A proposed activity is a project if it “is the sort that is  
4 capable of causing direct or reasonably foreseeable indirect effects on the environment.” (Union  
5 of Medical Marijuana Patients, Inc. v. City of San Diego (2019) 7 Cal.5th 1171, 1198.)

6           50.     The closure of a busy public street to vehicular traffic is clearly a project with the  
7 potential to have significant environmental impacts. (See, e.g., Citizens for Improved Sorrento  
8 Access, Inc. v. City of San Diego (2004) 118 Cal.App.4th 808, 812-813 [discussing city’s  
9 preparation of EIR to consider impact of closing street pursuant to Vehicle Code section  
10 21101(a)(1)].)

11           51.     Nonetheless, rather than comply with CEQA, the City erroneously asserted that  
12 “CEQA does not apply to a measure submitted to the voters by the Mayor or 5 Supervisors,”  
13 without further explanation or citation to any legal authority. Per binding California Supreme  
14 Court authority, “the discretionary submission of a ballot measure to the voters . . . is not exempt  
15 from CEQA.” (Friends of Sierra Madre v. City of Sierra Madre (2001) 25 Cal.4th 165, 171.)

16           52.     While measures which go on the ballot via an initiative petition signed by  
17 registered voters do not trigger CEQA (Devita v. County of Napa (1995) 9 Cal. 4th 763, 793-795),  
18 measures put on the ballot by four or more Supervisors are akin to a discretionary governmental  
19 action that is subject to CEQA. (Friends of Sierra Madre supra at 187.)

20           53.     Pursuant to CEQA, a project’s potential environmental effects must first be  
21 identified, assessed and publicly disclosed before it may be approved by an agency. A project  
22 with the potential to have significant environmental impacts may not be approved if there are  
23 feasible alternatives or mitigation measures that would avoid or substantially lessen the adverse  
24 environmental impacts.

25           54.     Neither Respondents nor the Proponents considered feasible alternatives to the  
26 closure of the Upper Great Highway to most vehicles, or considered feasible mitigation measures  
27 for the closure’s environmental impacts.

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1 **FIFTH CAUSE OF ACTION**

2 **(Declaratory Relief That Proposition K Violates**  
3 **The Law and Must Not Be Given Legal Effect)**

4 71. Petitioners incorporate by reference all of the allegations contained in paragraphs 1  
5 - 59 as though fully set forth herein.

6 72. An actual controversy has arisen between the Petitioners and Respondents in that  
7 Petitioners believe and contend, for the reasons set forth above, that Proposition K violates the law  
8 and must not be given legal effect. Further, upon information and belief, Respondents believe and  
9 contend that Proposition K does not violate the law and must be given legal effect.

10 73. A judicial determination and declaration as to the legality of Proposition K, as set  
11 forth above, is therefore necessary and appropriate to determine the respective rights and duties of  
12 the parties.

13 74. Based on the foregoing allegations, Petitioners are entitled to a judicial declaration  
14 that Proposition K is legally invalid and shall not be given any legal effect.

15 **PRAYER**

16 WHEREFORE, Petitioners pray for judgment as follows:

17 1. On the First Cause of Action, that this Court issue alternative and preemptory writs  
18 of mandate prohibiting Respondents, and their officers, agents, and all persons acting by, through,  
19 or in concert with them, from taking any action that would give legal effect to Proposition K;

20 2. On the Second Cause of Action, that this Court issue alternative and preemptory  
21 writs of mandate prohibiting Respondents, and their officers, agents, and all persons acting by,  
22 through, or in concert with them, from taking any action that would give legal effect to  
23 Proposition K;

24 3. On the Third Cause of Action, that this Court issue alternative and preemptory  
25 writs of mandate prohibiting Respondents, and their officers, agents, and all persons acting by,  
26 through, or in concert with them, from taking any action that would give legal effect to  
27 Proposition K;

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1           4.       On the Fourth Cause of Action, that this Court issue a temporary restraining order,  
2 preliminary injunction, and permanent injunction prohibiting Respondents, and their officers,  
3 agents, and all persons acting by, through, or in concert with them, from taking any action that  
4 would give legal effect to Proposition K;


5           5.       On the Fifth Cause of Action, that this court issue its judgment declaring that  
6 Proposition K is legally invalid and must not be given legal effect;

7           6.       For an award of attorneys' fees, litigation expenses, and costs as permitted or  
8 required by law, including but not limited to CCP section 1021.5, California Government Code  
9 section 800, and other statutory and common law; and

10          7.       That this Court grant Petitioners such other, different, or further relief as the Court  
11 may deem just and proper.

12  
13 Dated: March 11, 2025

RUTAN & TUCKER, LLP  
JAMES R. SUTTON  
ELI B. LOVE

14  
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16 By:   
17 \_\_\_\_\_  
18 Jim Sutton  
19 Attorneys for Petitioners/Plaintiffs  
20 MATTHEW BOSCHETTO; ALBERT  
21 CHOW; LISA ARJES and LIVABLESF,  
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**STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO**

I have read the foregoing and know its contents.

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I am informed and believe that they are true.

Executed on March 10, 2025, at San Francisco, California.

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



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Matthew Boschetto



VERIFICATION

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**STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO**

I have read the foregoing and know its contents.

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I am informed and believe that they are true.

Executed on March 10, 2025, at San Francisco, California.

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



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Lisa Arjes

VERIFICATION

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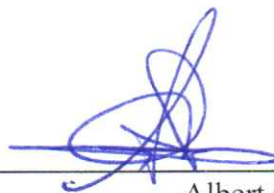
**STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO**

I have read the foregoing and know its contents.

I am a party to this action. The matters stated in the foregoing document are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I am informed and believe that they are true.

Executed on March 10, 2025, at San Francisco, California.

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



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Albert Chow

VERIFICATION

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**STATE OF CALIFORNIA, COUNTY OF SAN FRANCISCO**

I have read the foregoing and know its contents.

I am an officer of Livable SF, Inc., a party to this action, and am authorized to make this verification for and on its behalf, and I make this verification for that reason. The matters stated in the foregoing document are true of my own knowledge.

Executed on March 10, 2025, at San Francisco, California.

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

Livable SF, Inc.

By: 

\_\_\_\_\_  
Vin Budhai, President

1 **PROOF OF SERVICE**

2 *(Matthew Boschetto et al v. City and County of San Francisco et al. and RPI*  
3 *SFO Case No.: )*

4 **STATE OF CALIFORNIA, COUNTY OF ORANGE**

5 I am employed by the law office of Rutan & Tucker, LLP in the County of Orange, State  
6 of California. I am over the age of 18 and not a party to the within action. My business address is  
7 18575 Jamboree Road, 9th Floor, Irvine, CA 92612. My electronic notification address is  
8 pcarvalho@rutan.com.

9 On March 11, 2025, I served on the interested parties in said action the within:

10 **NOTICE OF COMMENCEMENT OF ACTION (Pub.Res.Code §21167.5)**

11 as stated below:

12  (BY MAIL) by placing a true copy thereof in sealed envelope(s) addressed as shown on  
13 the attached service list.

14 In the course of my employment with Rutan & Tucker, LLP, I have, through first-hand  
15 personal observation, become readily familiar with Rutan & Tucker, LLP's practice of collection  
16 and processing correspondence for mailing with the United States Postal Service. Under that  
17 practice, I deposited such envelope(s) in an out-box for collection by other personnel of Rutan &  
18 Tucker, LLP, and for ultimate posting and placement with the U.S. Postal Service on that same  
19 day in the ordinary course of business. If the customary business practices of Rutan & Tucker,  
20 LLP with regard to collection and processing of correspondence and mailing were followed, and I  
21 am confident that they were, such envelope(s) were posted and placed in the United States mail at  
22 Irvine, California, that same date. I am aware that on motion of party served, service is presumed  
23 invalid if postal cancellation date or postage meter date is more than one day after date of deposit  
24 for mailing in affidavit.

25  (BY E-MAIL) by transmitting a true copy of the foregoing document(s) to the e-mail  
26 addresses set forth on the attached service list.

27 Executed on March 11, 2025, at Irvine, California.

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

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*Pamela J. Carvalho*

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**SERVICE LIST**

*(Matthew Boschetto et al v. City and County of San Francisco et al. and RPI  
SFO Case No.: )*

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For the City and County of San Francisco

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