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6 Environmental Council of Sacramento

7 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 FOR THE COUNTY OF SACRAMENTO

9
10 ENVIRONMENTAL COUNCIL OF)
11 SACRAMENTO;)

12 Petitioner)

13 v.)

14 CALIFORNIA DEPARTMENT OF)
15 TRANSPORTATION, MICHAEL)
16 DOUGHTERY, Director; and,)
DOES 1 through 20;)

17 Respondents)

18 UNITED STATES DEPARTMENT OF)
19 TRANSPORTATION; FEDERAL)
20 HIGHWAY ADMINISTRATION and,)
DOES 21-100;)

21 Real Parties in Interest)

Case No. _____

**VERIFIED PETITION FOR WRIT
OF MANDATE**

BY FAX

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1 for the Project, CalTrans is responsible for preparation of an environmental document and
2 describes the Project and its impacts, and if necessary evaluates mitigation measures and/or
3 alternatives to lessen or avoid any significant environmental impacts. CalTrans is responsible
4 for implementing and complying with the provisions of CEQA and the CEQA Guidelines with
5 respect to the Project.

6 6. Respondent Malcolm Dougherty is the Director of CalTrans. As Director, Mr.
7 Kempton is responsible for the day-to-day operation of CalTrans. Mr. Dougherty is sued in his
8 official capacity as Director of CalTrans.

9 7. Petitioner is unaware of the true names and capacities of Respondents identified as
10 Does 1-20. Petitioner is informed and believes, and on that basis alleges, that Respondents Does
11 1-20, inclusive, are individuals, entities or agencies with material interests affected by the Project
12 with respect to the Project or by the County's actions with respect to the Project. When the true
13 identities and capacities of these Respondents have been determined, Petitioner will, with leave
14 of Court if necessary, amend this Petition to insert such identities and capacities.

15 8. Real Party in Interest United States Department of Transportation, Federal
16 Highway Administration is an agency of the United States. The Federal Highway
17 Administration is the federal lead agency for Project the under the National Environmental
18 Policy Act.

19 9. Petitioner is unaware of the true names and capacities of Real Parties in Interest
20 identified as Does 21-100. Petitioner is informed and believes, and on that basis alleges, that
21 Respondents Does 21-100, inclusive, are individuals, entities or agencies with material
22 interests affected by the Project or by CalTrans' actions with respect to the Project. When the
23 true identities and capacities of these Real Parties in Interest have been determined, Petitioner
24 will, with leave of Court if necessary, amend this Petition to insert such identities and
25 capacities.

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