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 LOS ANGELES  
 SUPERIOR COURT

8 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
 9 FOR THE COUNTY OF LOS ANGELES

11 FRANK MANCUSO, SR., an  
 individual,

12 Petitioner,

13 v.

14 CALIFORNIA STATE COASTAL  
 15 CONSERVANCY, an agency of the  
 State of California, CALIFORNIA )  
 16 STATE COASTAL CONSERVANCY BOARD, )  
 the governing body of the )  
 17 California State Coastal )  
 Conservancy, CALIFORNIA )  
 18 DEPARTMENT OF GENERAL SERVICES, )  
 an agency of the State of )  
 19 California, and DOES 1 through )  
 100, )

20 Respondents.

CASE NO. BS0407.

PETITION FOR ALTERNATIVE WRIT  
 OF MANDATE

[Code Civ. Proc. 885]

**RECEIVED**

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STATE COASTAL CONSERVANCY  
 OAKLAND, CALIF.

COPY

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M uso, Sr.

SUPERIOR

8 SUPERIOR COURT FOR THE STATE OF CALIFORNIA  
9 FOR THE COUNTY OF LOS ANGELES

11 F RANK MANCUSO, SR., an )  
i ndividual, )  
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P etitioner, )  
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15 C ONSERVANCY, an agency of the )  
S tate of California, CALIFORNIA )  
16 S TATE COASTAL CONSERVANCY BOARD, )  
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17 C alifornia State Coastal )  
C oastal Conservancy, CALIFORNIA )  
18 D EPARTMENT OF GENERAL SERVICES, )  
a n agency of the State of )  
19 C alifornia, and DOES 1 through )  
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R espondents. )  
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CASE NO. BS 040197  
PETITION FOR ALTERNATIVE WRIT  
OF MANDATE  
[Code Civ. Proc. § 1085]

22 T HE HONORABLE JUDGE OF THE SUPERIOR COURT:  
23 P etitioner Frank Mancuso, Sr. petitions this Court for an  
24 a lternative writ of mandate pursuant to section 1085 of the Code  
25 o f Civil Procedure to vacate the California Coastal Conservancy's  
26 ("Conservancy") May 16, 1996 action with respect to Conservancy  
27 F iled No. 88-46 (the "May 16 Action") for the Conservancy's failure  
28 t o provide due process and statutorily required notice and

1 opportunity to be heard to Petitioner and other affected members  
2 of the public, and for failure to comply with the California  
3 Environmental Quality Act. Petitioner, by this verified petition,  
4 alleges as follows:

5 INTRODUCTION

6 1. This action is necessitated by the Conservancy's failure  
7 to provide Petitioner and other affected members of the public  
8 with notice and an opportunity to be heard regarding specific  
9 actions authorized by the Conservancy Board ("Board") on May 16,  
10 1996 as part of the Conservancy's ongoing efforts to plan and  
11 develop an easement for general public use to an area commonly  
12 known as Escondido Beach. The easement traverses certain real  
13 property and various physical improvements which are owned by  
14 Petitioner and which are utilized as his personal residence. The  
15 Conservancy's failure to provide notice and opportunity to be  
16 heard violated the well-established due process rights of  
17 Petitioner and other members of the public as identified by the  
18 California Supreme Court in Horn v. County of Ventura, 4 Cal. 3d  
19 605, 156 Cal. Rptr. 718 (1979). Such lack of notice was also due  
20 in part to the Conservancy's related failure to develop and  
21 implement notice procedures as statutorily required by Section  
22 31107.1 of the Public Resources Code.

23 2. Petitioner and other members of the public have suffered  
24 irreparable injury in that unless they are afforded notice and an  
25 opportunity to be heard, numerous public concerns pertaining to  
26 the opening, operation and maintenance of the easement will be  
27 improperly excluded from the Board's consideration.

28

1 . The Conservancy has refused Petitioner's repeated  
2 re able requests that the Conservancy correct such defects by  
3 st ing further action and re-opening its consideration of the May  
4 16 96 Action so that Petitioner and other affected members of  
5 th blic can be afforded proper notice and an opportunity to be  
6 he Indeed, Conservancy staff has failed and refused to even  
7 pr t such requests to the Board.

8 THE PARTIES

9 . Petitioner Frank Mancuso, Sr. ("Petitioner") is an  
10 ind ividual who is, and at all times mentioned herein was, the  
11 own er of certain real property which is improved as a single  
12 fam ily residence located within the City of Malibu, Los Angeles  
13 Cou nty, California (hereinafter "Petitioner's Residence") and  
14 whi ch is burdened by a currently undeveloped easement.

15 . Respondent the California State Coastal Conservancy (the  
16 "Co nservancy") is an agency located within the California  
17 Res ources Agency. The Conservancy holds the public easement in  
18 que stion which burdens Petitioner's Residence. The Conservancy is  
19 cur rently considering opening and developing that easement.

20 . Respondent the California State Coastal Conservancy  
21 Boa rds (the "Board") is the governing body of the Conservancy,  
22 whi ch is charged with decision-making authority regarding the  
23 eas ement in question.

24 . Respondent the California State Department of General  
25 Ser vices ("Department of General Services") is an agency of the  
26 Sta te of California.

27 The true names and capacities of DOES 1 through 100,  
28 inc lude, whether individual, corporate, associate or otherwise,

1 are unknown to Petitioner, who names these DOES by s fictitious  
2 names and who will seek leave of court to amend this ition to  
3 show their true names and capacities when the same h been  
4 ascertained.

5 FACTUAL ALLEGATIONS

6 The Easement

7 9. The Conservancy currently holds title to an sement  
8 which is commonly known as the "Chiate/Wildman easem  
9 (hereinafter the "Easement") which traverses a portio f  
10 Petitioner's property. The Easement also burdens a s nd  
11 residential property adjacent to petitioner's.

12 10. Although no easement existed across Petition 's  
13 Residence historically, such Easement was extracted a he  
14 insistence of the California Coastal Commission ("Com sion") in  
15 1978 as a condition for granting permits to develop titioner's  
16 Residence and the single family home on the property acent to  
17 Petitioner's Residence. Such requirement was imposed ior to the  
18 United States Supreme Court's 1987 holding in Nollan California  
19 Coastal Commission, 483 U.S. 825, 107 S. Ct. 3141 (19 , that  
20 involuntary extractions (akin to the Commission's ext tion of  
21 the Easement in question) by governmental agencies as condition  
22 of issuing development permits constitute "takings" i he absence  
23 of an essential nexus.

24 11. The Easement is 10 feet in width and commen at  
25 Pacific Coast Highway. The Easement is currently uni oved, not  
26 open to the public, and impassable due to severe natu  
27 landforms, dense natural vegetation, and private impr ements.

28 Upon entering the property which comprises Petitioner Residence,

1 the easement overlays a portion of Petitioner's private driveway,  
2 passes through Petitioner's front and side yard improvements  
3 adjacent to his house, through portions of Petitioner's rear yard,  
4 and when drops steeply down to Escondido Beach, which is  
5 approximately 130 feet below Pacific Coast Highway.

6 Conservancy's Failure to Provide Petitioner with  
7 Notice or an Opportunity to Be Heard

8 12. In order to open the Easement, the Conservancy must,  
9 among other things, determine that the benefits of public use are  
10 not outweighed by the costs of development and maintenance.

11 Public Resources Code Section 31404. On May 16, 1996 the Board  
12 authorized a proposed action regarding the scope, budget and  
13 authority for a study of opening and developing the Easement.

14 13. Despite the fact that Petitioner owns property over  
15 which a portion of the Easement runs, the Conservancy failed to  
16 provide Petitioner with notice of the May 16, 1996 Action and an  
17 opportunity to be heard regarding the appropriate scope of the  
18 proposed study.

19 14. On information and belief, Petitioner's neighbors and  
20 other area residents who also would be adversely affected by the  
21 development of the Easement were not provided with notice or an  
22 opportunity to be heard regarding the proposed May 16 Action.

23 15. As a result of the lack of notice, the Board failed to  
24 obtain required property owner and public input, and improperly  
25 excluded from the study consideration of all of the issues which  
26 must be evaluated in connection with determining the actual cost  
27 of developing and maintaining the Easement for public use so as to

28

1 enable a fully informed determination to be made pursuant to  
2 Section 31404.

3 16. Specifically, in its May 16, 1996 Action, Board  
4 improperly limited the scope of the study of the Easement to  
5 construction issues only. (See, Exhibit B at pages 10 and 11 to  
6 Administrative Record.) In addition, the Board limited the budget  
7 for the study to an amount sufficient to examine construction  
8 issues only, which as a practical matter ensures that the issues  
9 which concern Petitioner and other members of the public will not  
10 be analyzed. (See, Exhibit B at pages 6 and 7 to Administrative  
11 Record.)

12 17. Opening the Easement to public use will result, among  
13 other things, the demolition of existing improvements which  
14 comprise portions of Petitioner's Residence, dramatic alteration  
15 of existing landforms, and the construction of substantial  
16 improvements to make the Easement usable. Furthermore, and on  
17 information and belief, as demonstrated by the opening of similar  
18 access points along Pacific Coast Highway, opening the easement  
19 may attract hundreds and perhaps thousands of visitors on a daily  
20 basis to a location which is not provided with even the most basic  
21 infrastructure and services to serve the general public which in  
22 turn will result in life-safety hazards, unmitigatable  
23 environmental impacts and adverse effects to property owned by  
24 Petitioner and neighboring residents. All of such impacts should  
25 have been, but were not, included as items to be addressed in the  
26 study authorized by May 16, 1996 Action.

27 18. As a result of the Conservancy's failure to provide  
28 notice and opportunity to be heard, Petitioner and other members

1 of public were prevented from presenting the following  
2 specific issues to the Board for inclusion in the authorized scope  
3 of study:

4 (a) the Conservancy's ability to mitigate, and the cost  
5 of mitigating, traffic hazards resulting from the opening of the  
6 East entrance, which is situated along a high speed blind-  
7 curve of Pacific Coast Highway;

8 (b) the Conservancy's ability to provide, and the cost  
9 of providing, sufficient off-street parking to serve the Easement;

10 (c) the Conservancy's ability to provide, and the cost  
11 of providing, life-safety facilities, such as lifeguards,  
12 emergency communication, and rescue and evacuation services to the  
13 remote location of the Easement;

14 (d) the Conservancy's ability to provide, and the cost  
15 of providing, sanitary facilities, such as toilets and changing  
16 rooms to the remote location of the Easement;

17 (e) the Conservancy's ability to provide, and the cost  
18 of providing, police services to the remote location of the  
19 East entrance;

20 (f) the Conservancy's ability to mitigate, and the  
21 cost of mitigating, environmental impacts resulting from the  
22 intensification of the use of the beach in an area without  
23 sufficient infrastructure to support general recreational use.

24 (g) the Conservancy's ability to mitigate, and the  
25 cost of mitigating, environmental impacts resulting from the  
26 destruction of coastal bluffs, sensitive plant and animal species,  
27 the protected Monarch Butterfly habitat, and other issues required  
28 to be addressed and mitigated to comply with CEQA and the Coastal Act;

1 (h) the Conservancy's ability to mitigate and the  
2 costs of mitigating, erosion and geologic hazards resulting from  
3 development of the Easement and its use by the public;  
4 (i) the costs of maintaining the Easement subsequent to  
5 development;  
6 (j) the ability to develop the Easement, the cost  
7 of developing the Easement in a manner which will not  
8 upon the privacy of Petitioner's Residence and adjacent  
9 residential property; and

10 (k) reasonable arrangements for the Conservancy's  
11 vendors and contractors to enter upon Petitioner's Residence to  
12 conduct studies of the Easement without the disruption of  
13 Petitioner's privacy and quiet enjoyment of his residence.

14 19. Unless the issues identified in Paragraphs 17 and 18  
15 above are considered as part of the study, the Conservancy will  
16 not be provided with any analysis of all of the costs associated  
17 with developing and maintaining the Easement and hence cannot  
18 fully comply with its responsibilities under Section 1004 of the  
19 Public Resources Code.

20 20. On May 14, 1996, Petitioner became apprised of the  
21 impending Conservancy meeting and the proposed action item  
22 regarding the Easement study. Petitioner's counsel telephoned  
23 upon  
24 wrote and called the Conservancy to request that the Conservancy  
25 continue the matter until after Petitioner and other members of  
26 the public were provided with due notice and opportunity to be  
27 heard. (See, Exhibit C at pages 16 and 17 to Administrative  
28 Record.) This reasonable request was rejected by the Conservancy  
staff; instead the Board acted and authorized the study as

1 de bed in Paragraph 16, above. (See, Exhibit D at page 18 to  
2 Ad strative Record.)  
3 1. Upon becoming informed of that the matter had not been  
4 co ued as requested, Petitioner requested that the Conservancy  
5 st all work being undertaken pursuant to the May 16 Action until  
6 af a duly noticed public hearing had taken place. (See,  
7 Ex t E at page 21 to Administrative Record.)

8 2. Conservancy staff summarily and improperly denied  
9 Pe oner's request without presenting the same to the Board.  
10 Up becoming aware of staff's ultra vires denial of his request,  
11 Pe oner objected and demanded that the Board be presented with  
12 Pe oner's request for notice and opportunity to be heard.  
13 De e Petitioner's demand, staff failed and refused to present  
14 su equest to the Board (See, Exhibit I at page 29 to  
15 Ad strative Record.)

16 FIRST CAUSE OF ACTION - WRIT OF MANDATE

17 VIOLATION OF DUE PROCESS

18 (Against the Conservancy and the Board)

19 (Cal. Civ. Proc. Code. § 1085)

20 3. Petitioner realleges and incorporates herein by this  
21 re nce as though the same were fully set forth herein each and  
22 ev allegation set forth above in Paragraphs 1 through 22,  
23 in sive, of this Petition.

24 4. Petitioner has exhausted all administrative remedies  
25 av ble to him, as alleged in Paragraphs 20 through 22, above by  
26 re ting on numerous occasions that the Conservancy suspend  
27 ac ty pursuant to the May 16 Action until Petitioner has been  
28 pr ed with notice and an opportunity to be heard regarding the

1 issues which should be included in the study of the Easement.  
2 Petitioner's repeated requests for notice and an opportunity to be  
3 heard have been denied, and indeed, Conservancy staff refused to  
4 present such requests to the Conservancy Board (See, Declaration  
5 of Allan J. Abshez at ¶¶ 8, 9 and 10.) The Conservancy's actions  
6 therefore demonstrate that, not only has Petitioner exhausted his  
7 administrative remedies, but it would have been futile for him to  
8 do anything other than file the instant Petition.

9 25. Pursuant to Horn v. County of Ventura, 24 Cal. 3d 605,  
10 156 Cal. Rptr. 718 (1979), the Conservancy had a ministerial duty  
11 to provide Petitioner, as a property owner whose property rights  
12 will be affected by the Conservancy's activities, with notice and  
13 an opportunity to be heard regarding which issues should be  
14 addressed in the study considering opening and developing the  
15 Easement.

16 26. The Conservancy failed to provide Petitioner with notice  
17 and an opportunity to be heard in violation of its ministerial  
18 duty as required by Horn v. County of Ventura, 24 Cal. 3d 605, 156  
19 Cal. Rptr. 718 (1979), and has since repeatedly refused  
20 Petitioner's reasonable requests to stay the study until a  
21 properly noticed hearing has been held.

22 27. Consequently, Petitioner has no other speedy and adequate  
23 remedy in the ordinary course of law except pursuant to the claims  
24 raised in this Petition.

25 28. The Conservancy's actions and failures to act as  
26 described herein, constitute separate and independent violations  
27 of its duties as imposed by California law, and prejudicial abuses  
28 of discretion. Petitioner is therefore entitled to relief through

1 the issuance of a writ of mandate pursuant to Section 1085 of the  
2 California Code of Civil Procedure, as set forth in the prayer for  
3 relief in connection with this First Cause of Action.

4 SECOND CAUSE OF ACTION - WRIT OF MANDATE

5 FAILURE TO PROVIDE SECTION 31107.1 NOTICE

6 (Against the Conservancy and the Board)

7 (Cal. Civ. Proc. Code. § 1085)

8 29. Petitioner realleges and incorporates herein by this  
9 reference as though the same were fully set forth herein each and  
10 every allegation set forth above in Paragraphs 1 through 28,  
11 inclusive, of this Petition.

12 30. Section 31107.1 of the Public Resources Code requires  
13 the Conservancy and the Department of General Services to jointly  
14 develop and implement procedures to ensure that the Conservancy's  
15 transactions are undertaken "efficiently and equitably with proper  
16 notice to the public."

17 31. The Conservancy failed to provide Petitioner with notice  
18 of the Conservancy's proposed May 16 Action in violation of its  
19 ministerial duty imposed by Section 31107.1 of the Public  
20 Resources Code.

21 32. The Conservancy's actions and failures to act, as  
22 described herein, constitute separate and independent violations  
23 of its duties as imposed by California law, and prejudicial abuses  
24 of discretion. Petitioner is therefore entitled to relief through  
25 the issuance of a writ of mandate pursuant to Section 1085 of the  
26 California Code of Civil Procedure, as set forth in the prayer for  
27 relief in connection with this Second Cause of Action.

28

1 THIRD CAUSE OF ACTION - WRIT OF MANDATE

2 FAILURE TO INSTITUTE SECTION 31107.1 NOTICE PROCEDURES

3 (Against All Respondents)

4 (Cal. Civ. Proc. Code § 1085)

5 33. Petitioner realleges and incorporates here by this  
6 reference as though the same were fully set forth here each and  
7 every allegation set forth above in Paragraphs 1 through 32,  
8 inclusive, of this Petition.

9 34. Section 31107.1 of the Public Resources Code requires  
10 the Conservancy and the Department of General Services to jointly  
11 develop and implement procedures to ensure that the Conservancy's  
12 transactions are undertaken "efficiently and equitably with proper  
13 notice to the public."

14 35. Although the Conservancy and the Department of General  
15 Services have entered into a "Memorandum of Understanding  
16 Concerning Real Property Transactions" (hereinafter "Memorandum of  
17 Understanding") which the Conservancy contends satisfies the  
18 Conservancy's obligations under Section 31107.1 (see Exhibit J at  
19 pages 32 to 42 of the Administrative Record), the Memorandum of  
20 Understanding does not ensure that the Conservancy's transactions  
21 are undertaken "with proper notice to the public" as required by  
22 Section 31107.1. In fact, the only provisions regarding public  
23 notice in the Memorandum of Understanding relate solely to the  
24 Conservancy's disposition of property. (See, Exhibit at pages  
25 39 to 42 of the Administrative Record.)

26 36. The failure of the Conservancy and/or the Department of  
27 General Services to develop and implement notice procedures as  
28 required by Section 31107.1 of the Public Resources Code

1 contributed to the Conservancy's failure to provide Petitioner and  
2 interested members of the public with notice and opportunity  
3 to be heard regarding the proposed study, and constitutes a  
4 continuing violation of the Conservancy's statutory obligations to  
5 the public and property owners throughout California that may be  
6 materially affected by the Conservancy's actions.

7 37. The Conservancy's and Department of General Services'  
8 actions and failures to act, as described herein, constitute  
9 separate and independent violations of their duties as imposed by  
10 California law, and prejudicial abuses of discretion. Petitioner  
11 is therefore entitled to relief through the issuance of a writ of  
12 mandate pursuant to Section 1085 of the California Code of Civil  
13 Procedure, as set forth in the prayer for relief in connection  
14 with this Third Cause of Action.

15 FOURTH CAUSE OF ACTION - WRIT OF MANDATE

16 VIOLATION OF THE CALIFORNIA ENVIRONMENTAL QUALITY ACT

17 (Against the Conservancy and the Board)

18 (Cal. Civ. Proc. Code § 1085 & Pub. Res. Code § 21102)

19 38. Petitioner realleges and incorporates herein by this  
20 reference as though the same were fully set forth herein each and  
21 every allegation set forth above in Paragraphs 1 through 37,  
22 inclusive, of this Petition.

23 39. Developing the Easement and opening it to public use  
24 constitutes a discretionary project which is subject to the  
25 provisions of the California Environmental Quality Act  
26 (hereinafter "CEQA").

27 40. The Conservancy characterizes the study authorized by  
28 the Board on May 16, 1996 as a "feasibility study" of the project.

1 41. Section 21102 of the Public Resources Code requires that  
2 feasibility studies must include the consideration of  
3 environmental factors.

4 42. Section 21106 of the Public Resources Code requires that  
5 all state agencies must request in their budgets the funds  
6 necessary to protect the environment in relation to problems  
7 caused by the agencies' activities.

8 43. In violation of the ministerial duty imposed by Section  
9 21102 and in violation of CEQA's prohibition against "piece-  
10 meal" evaluation of projects, the study authorized by the  
11 Conservancy only authorizes consideration of construction costs  
12 and does not include the consideration of any environmental  
13 factors, including factors necessary to enable the Conservancy to  
14 comply with its obligations under Section 21106 of the Public  
15 Resources Code. (See, Exhibit B at pages 6, 7 and 10 of the  
16 Administrative Record.) Specifically, the study will not include  
17 consideration of the factors set forth in Paragraph 1 of this  
18 Petition.

19 44. In accordance with Section 21177(e) of the Public  
20 Resources Code, Petitioner's exhaustion obligation under CEQA is  
21 excused by the failure of the Conservancy to provide Petitioner  
22 with notice and an opportunity to be heard.

23 45. The Conservancy's actions and failures to act as  
24 described herein, constitute separate and independent violations  
25 of its duties as imposed by California law, and prejudicial abuses  
26 of discretion. Petitioner is therefore entitled to relief through  
27 the issuance of a writ of mandate pursuant to Section 85 of the

28

1 California Code of Civil Procedure, as set forth in the prayer for  
2 relief in connection with this Fourth Cause of Action.

3 PRAYER FOR RELIEF

4 WHEREFORE, Petitioner prays for relief as follows:

5 . On the First, Second, Third, and Fourth Causes of  
6 Action, that this Court issue an alternative writ of mandate,  
7 pursuant to Section 1085 of the California Code of Civil  
8 Procedure, commanding Respondents and each of them, to stay all  
9 activities relating to the May 16 Action until Petitioner and  
10 other affected property owners have been provided with notice and  
11 an opportunity to be heard regarding the scope of any study or  
12 studies relating to the feasibility of opening and/or developing  
13 the segment;

14 . On the Third Cause of Action, that this Court issue an  
15 alternative writ of mandate, pursuant to Section 1085 of the  
16 California Code of Civil Procedure, commanding Respondents and  
17 each of them, to develop and implement notice procedures to ensure  
18 that the Conservancy's transactions are undertaken "efficiently  
19 and suitably with proper notice to the public" as required by  
20 Section 31107.1 of the Public Resources Code.

21 . On the Fourth Cause of Action, that this Court issue an  
22 alternative writ of mandate, pursuant to Section 1085 of the  
23 California Code of Civil Procedure, commanding Respondents and  
24 each of them, to include environmental factors listed in Paragraph  
25 18 above within the scope of any feasibility study regarding the  
26 Easement which may be authorized after Petitioners and other  
27 affected property owners are provided with notice and opportunity  
28 to be heard;

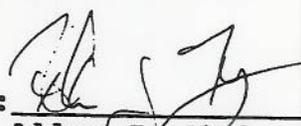
1 D. On the First, Second, Third, and Fourth Counts of  
2 Action, that the Court award Petitioner attorneys' fees pursuant  
3 to Section 1021.5 of the California Code of Civil Procedure on the  
4 grounds that (i) Petitioner's action protects the important right  
5 of the general public to receive notice of the Conservancy's  
6 transactions and compels the Conservancy and the Department of  
7 General Services to develop and implement long-overdue notice  
8 procedures, (ii) Petitioner's action protects the important right  
9 of the general public that feasibility studies include  
10 consideration of environmental factors as required by CEQA, and  
11 (iii) Petitioner has undertaken a substantial financial burden,  
12 disproportionate to his individual stake in the matter, in an  
13 effort to privately enforce compliance with California law;

14 E. That the Court award Petitioner the costs of suit  
15 incurred herein; and

16 F. That the Court award Petitioner such other relief ther  
17 relief as the Court may deem just and proper.

18  
19 Dated: July 2, 1996

20 IRELL & MANELLA LLP  
21 Allan J. Abshez  
22 Michael S. Lowe

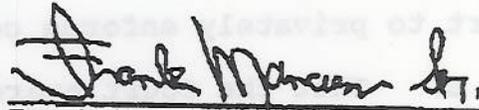
23 By:   
24 Allan J. Abshez  
25 Attorneys for Petitioner Frank  
26 Mancuso, Sr.  
27  
28

VERIFICATION

Frank Mancuso, Sr., hereby verify:

I am the Petitioner in this action and have read the  
foregoing Petition and know its contents. I declare that the  
facts alleged in the Petition are true of my own knowledge  
I declare under penalty of perjury under the laws of the  
State of California that the foregoing is true and correct and  
that this verification is executed this 2<sup>nd</sup> day of July

1996.

  
Frank Mancuso, Sr.

L. R. MANILLA LLP  
United Utility Industry  
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Special Compensation  
8 Ave. Of The Stars  
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92807-4270

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