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4 Attorney for Plaintiffs

5 MICHAEL CHAMNESS, DANIEL FREDERICK,  
6 and RICH WILSON

7  
8 IN THE UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA

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11 MICHAEL CHAMNESS, DANIEL  
12 FREDERICK, RICH WILSON,

13 *Plaintiffs,*

14 vs.

15 DEBRA BOWEN, in only her  
16 official capacity as California  
17 Secretary of State; DEAN LOGAN,  
18 in only his official capacity as  
19 Registrar-Recorder / County Clerk  
20 of the County of Los Angeles; and  
21 DOES 1-10;

22 *Defendants,*

23 ABEL MALDONADO, an  
24 individual; CALIFORNIA  
25 INDEPENDENT VOTER  
26 PROJECT; and CALIFORNIANS  
27 TO DEFEND THE OPEN  
28 PRIMARY;

*Intervenors-  
Defendants*

CASE NO. 2:11-CV-01479 ODW  
(FFMx)

**PLAINTIFFS' INITIAL  
DISCLOSURES PURSUANT TO  
FRCP 26(A)(1)**

HEARING DATE: June 13, 2011  
HEARING TIME: 1:30 pm  
JUDGE: Hon. Otis D. Wright II  
COURTROOM: 11

26 Plaintiffs hereby provide the following initial disclosures pursuant to FRCP  
27 26(a)(1):

1 I. Individuals “likely to have discoverable information”

2 A. Plaintiff Michael Chamness, c/o Gautam Dutta, Esq., 39270 Paseo  
3 Padre Pkwy # 206, Fremont, CA 94538; 415.236.2048. Subjects of  
4 information: Plaintiff Chamness’ claims in this lawsuit.

5 B. Plaintiff Daniel Frederick, c/o Gautam Dutta, Esq., 39270 Paseo Padre  
6 Pkwy # 206, Fremont, CA 94538; 415.236.2048. Subjects of  
7 information: Plaintiff Frederick’s claims in this lawsuit.

8 C. Plaintiff Rich Wilson, c/o Gautam Dutta, Esq., 39270 Paseo Padre  
9 Pkwy # 206, Fremont, CA 94538; 415.236.2048. Subjects of  
10 information: Plaintiff Wilson’s claims in this lawsuit.

11 D. Los Angeles County Registrar-Recorder / County Clerk Dean Logan,  
12 c/o Brandi Moore, Esq., Office of the Los Angeles County Counsel,  
13 500 W. Temple St., Room 648, Los Angeles, CA 90012;  
14 213.974.1832. Subjects of information: Plaintiff Chamness’ claims  
15 in this lawsuit.

16 E. Secretary of State Debra Bowen, c/o George Waters, Esq., Office of  
17 the Attorney General, P.O. Box 944255, Sacramento, CA 94244-  
18 2550; 916.323.8050. Subjects of information: Plaintiffs’ claims in  
19 this lawsuit (including but not limited to their claim that Secretary  
20 Bowen made binding admissions in correspondence regarding the  
21 illegality of Senate Bill 6’s Vote Counting Ban and Party Preference  
22 Ban) and communications from, to, and within her office regarding  
23 Senate Bill 6.

24 F. Nichole Becker, Legislative Analyst, Office of Secretary of State  
25 Debra Bowen, c/o George Waters, Esq., Office of the Attorney  
26 General, P.O. Box 944255, Sacramento, CA 94244-2550;  
27 916.323.8050. Subjects of information: Plaintiffs’ claims in this  
28 lawsuit (including but not limited to their claim that Secretary Bowen

1 made binding admissions regarding the illegality of Senate Bill 6's  
2 Vote Counting Ban and Party Preference Ban) and communications  
3 from, to, and within the Office of the Secretary of State regarding  
4 Senate Bill 6.

5 G. Ronda Paschal, Deputy Secretary for Legislative and Constituent  
6 Affairs, Office of Secretary of State Debra Bowen, c/o George  
7 Waters, Esq., Office of the Attorney General, P.O. Box 944255,  
8 Sacramento, CA 94244-2550; 916.323.8050. Subjects of  
9 information: Plaintiffs' claims in this lawsuit (including but not  
10 limited to their claim that Secretary Bowen made binding admissions  
11 regarding the illegality of Senate Bill 6's Vote Counting Ban and  
12 Party Preference Ban) and communications from, to, and within the  
13 Office of the Secretary of State regarding Senate Bill 6.

14 H. Abel Maldonado, former Lieutenant Governor, c/o Marguerite Leoni  
15 and Chris Skinnell, Esq. 2350 Kerner Blvd # 250, San Rafael, CA  
16 94901; 415.389.6800. Subjects of information: Plaintiffs' claims in  
17 this lawsuit (including but not limited to their claim that Secretary  
18 Bowen made binding admissions regarding the illegality of Senate  
19 Bill 6's Vote Counting Ban and Party Preference Ban) and  
20 communications from, to, and within the Office of the Lieutenant  
21 Governor regarding Senate Bill 6.

22 I. Dinora Ramirez, former Capitol Director, Office of the Lieutenant  
23 Governor, current contact information not known by Plaintiffs.  
24 Subjects of information: Plaintiffs' claims in this lawsuit (including  
25 but not limited to their claim that Secretary Bowen made binding  
26 admissions regarding the illegality of Senate Bill 6's Vote Counting  
27 Ban and Party Preference Ban) and communications from, to, and  
28 within the Office of the Lieutenant Governor regarding Senate Bill 6.

1 II. Documents Supporting Plaintiffs' Claims

2 A. All documents filed by Plaintiffs in this lawsuit, including but not  
3 limited to (a) their First Amended Complaint and (b) all documents  
4 filed by Plaintiffs in connection with their Motion for Summary  
5 Judgment.

6 III. Computation of damages: N/A (Plaintiffs' Motion for Summary Judgment  
7 seeks declaratory relief, not money damages)

8 IV. Insurance Agreements: N/A

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11 DATED: May 31, 2011

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Respectfully submitted,

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By: /s/ \_\_\_\_\_  
GAUTAM DUTTA, ESQ.

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Attorney for Plaintiffs

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MICHAEL CHAMNESS, DANIEL  
FREDERICK, and RICH WILSON

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