STATE OF CALIFORNIA GAVIN NEWSOM, Governor



Sacramento Regional Office 1031 18th Street Sacramento, CA, 95811-4124 Telephone: (916) 584-5676



August 19, 2021

Michael Plank, Attorney Bush Gottlieb 801 N. Brand Blvd., Ste. 950 Glendale, CA 91203

Erica Deutsch, Attorney Bush Gottlieb 801 North Brand Blvd., #950 Glendale, CA 91203

David A. Moreno, Attorney Fagen, Friedman & Fulfrost, LLP 30 E. River Park Place W. Suite 400 Fresno, CA 93720

Lynn Beekman, Partner Fagen, Friedman & Fulfrost, LLP 1525 Faraday AVe., STe. 300 Carlsbad, CA 92008

Katy McCully Merrill, Associate Fagen, Friedman & Fulfrost, LLP 30 E. River Park Pl. W, Ste. 400 Fresno, CA 93720

Re: Association of Clovis Educators, CTA/NEA v. Clovis Unified School District

Unfair Practice Charge No. SA-CE-3047-E

COMPLAINT

## Dear Parties:

The Office of the General Counsel has issued the enclosed COMPLAINT in the above-entitled matter. The Respondent is required to file an **ANSWER** within twenty (20) calendar days from the date of service of the COMPLAINT, pursuant to PERB

Unfair Practice Charge No. SA-CE-3047-E August 19, 2021 Page 2

Regulation 32644.<sup>1</sup> The required contents of the **ANSWER** are described in PERB Regulation 32644(b).

If you have not filed a Notice of Appearance form, one should be completed and returned with your **ANSWER**. Please be aware that once legal counsel is designated, PERB will only correspond with that individual(s).

An informal settlement conference will be scheduled shortly. Please direct all inquiries, filings and correspondence to the undersigned. Designated legal counsel who do not attend the Informal Conference for any reason, must designate in writing consent that the meeting go forward in their absence, including, but not limited to the execution of a settlement agreement.

Sincerely,

James Coffey

Senior Regional Attorney

**Enclosure** 

<sup>&</sup>lt;sup>1</sup> PERB's Regulations are codified at California Code of Regulations, title 8, section 31001 et seq. The text of PERB's Regulations may be found at www.perb.ca.gov.

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Re: Association of Clovis Educators, CTA/NEA v. Clovis Unified School District

Unfair Practice Charge No. SA-CE-3040-E

COMPLAINT

## Dear Parties:

The Office of the General Counsel has issued the enclosed COMPLAINT in the above-entitled matter. The Respondent is required to file an **ANSWER** within twenty (20) calendar days from the date of service of the COMPLAINT, pursuant to PERB

Unfair Practice Charge No. SA-CE-3040-E August 19, 2021 Page 2

Regulation 32644.<sup>1</sup> The required contents of the **ANSWER** are described in PERB Regulation 32644(b).

If you have not filed a Notice of Appearance form, one should be completed and returned with your **ANSWER**. Please be aware that once legal counsel is designated, PERB will only correspond with that individual(s).

An informal settlement conference will be scheduled shortly. Please direct all inquiries, filings and correspondence to the undersigned. Designated legal counsel who do not attend the Informal Conference for any reason, must designate in writing consent that the meeting go forward in their absence, including, but not limited to the execution of a settlement agreement.

Sincerely,

James Coffey

Senior Regional Attorney

Enclosure

<sup>&</sup>lt;sup>1</sup> PERB's Regulations are codified at California Code of Regulations, title 8, section 31001 et seq. The text of PERB's Regulations may be found at www.perb.ca.gov.



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Re:

Association of Clovis Educators, CTA/NEA v. Clovis Unified School District

Injunctive Relief No. 804

Unfair Practice Charge No. SA-CE-3040-E / SA-CE-3047-E

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**Dear Parties:** 

By direction of the Board, the request for injunctive relief in the above-entitled matters is granted.

Sincerely,

J. Felix De La Torre General Counsel

**JFD**