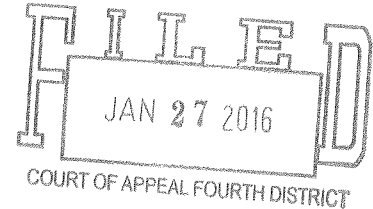




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January 26, 2016



The Honorable Art W. McKinster, Acting Presiding Justice
The Honorable Jeffrey King, Associate Justice
The Honorable Douglas P. Miller, Associate Justice
California Court of Appeal, Fourth Appellate District, Division Two
3389 Twelfth Street
Riverside, CA 92501

Re: Request for Publication of Opinion
City of Corona v. AMG Outdoor Advertising, Inc., et al.
Case No. E062869

Dear Justices McKinster, King, and Miller:

Pursuant to California Rules of Court, rule 8.1120(a), the League of California Cities (“League”) respectfully requests that the Court publish its January 7, 2016 opinion in *City of Corona v. AMG Outdoor Advertising, Inc., et al.*, Case No. E062869.

The League of California Cities is an association of 483 California cities dedicated to protecting and restoring local control to provide for the public health, safety, and welfare of their residents, and to enhance the quality of life for all Californians. The League is advised by its Legal Advocacy Committee, which is comprised of 24 city attorneys from all regions of the State. The Committee monitors litigation of concern to municipalities, and identifies those cases that are of statewide—or nationwide—significance. The Committee has identified this case as being of such significance.

The League is particularly interested in this case for the same reason stated by the City of Los Angeles in its January 25, 2016 Letter Requesting Publication¹ of this

¹ A copy of the City of Los Angeles’ January 25, 2016 Letter Requesting Publication is attached for the Court’s convenience, as the League does not seek to duplicate the arguments set forth in that letter, but to incorporate them by reference throughout this letter in the interest of efficiency and judicial economy.

The Honorable Art W. McKinster, Acting Presiding Justice
The Honorable Jeffrey King, Associate Justice
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opinion – that is, all local agencies that regulate signs in this State have a strong interest in legal certainty surrounding sign regulation. Cities routinely regulate based on the same onsite/offsite distinction at issue in this case, and rely on that distinction to maintain effective regulatory control of the growing onslaught of signage, including billboards, supergraphics, and – more recently – digital signage. The League also supported the City of Los Angeles as *amicus curiae* in the case currently pending before the California Court of Appeal for the Second Appellate District, Division 8, *Lamar Central Outdoor, LLC v. City of Los Angeles* (No. B260074).

The League also believes publication of the opinion is warranted for the same reasons set forth by the City of Los Angeles. Specifically, the Court of Appeal's opinion (1) involves a legal issue of continuing public interest regarding the constitutionality of onsite/offsite distinctions under the California Constitution and (2) reaffirms a principle of law set forth in *Metromedia, Inc. v. City of San Diego* (1980) 26 Cal.3d 848 that has not been applied in a recently reported decision. The City of Los Angeles explains in great detail in its Letter Requesting Publication why these standards set forth in California Rules of Court, rule 8.1105(c) are met, and the League does not seek to duplicate the points already raised.

The League of California Cities, therefore, respectfully requests that the Court publish the opinion for the reasons set forth by the City of Los Angeles in its January 25, 2016 Letter Requesting Publication.

Respectfully submitted,



Corrie Manning, SBN 278073

Sr. Deputy General Counsel, League of California Cities

CM:jl

Attachments: City of Los Angeles' January 25, 2016 Letter Requesting Publication and Opinion dated January 7, 2016

PROOF OF SERVICE
(Code of Civil Procedure §1013)
STATE OF CALIFORNIA - COUNTY OF SACRAMENTO

I, the undersigned, declare that I am a citizen of the United States and am employed in the City and County of Sacramento, State of California. I am over the age of 18 and not a party to this action; my business address is: 1400 K Street, Sacramento, CA 95814.

On January 26, 2016, I served the document(s) described as: **REQUEST FOR PUBLICATION (City of Los Angeles' Request for Publication and Opinion Attached)** in this action by placing true copies thereof enclosed in sealed envelopes addressed as follows:

PLEASE SEE ATTACHED SERVICE LIST

(BY MAIL) I enclosed the above-referenced document(s) in a sealed envelope or package and placed the envelope for collection and mailing, following our ordinary business practices. I am "readily familiar" with the firm's practice for collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Sacramento, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

(BY FAX) I transmitted, pursuant to Rules 2001 et seq., the above-referenced document(s) by facsimile machine (which complied with Rule 2003(3)), to the above-listed facsimile number(s). The transmission originated from facsimile phone number (916) 658-8240 and was reported as complete and without error. The facsimile machine properly issued a transmission report, a copy of which is attached hereto.

(BY PERSONAL SERVICE) I enclosed the above-referenced document(s) in a sealed envelope or package and caused the above-referenced document(s) to be delivered by hand to the offices of the addressee(s).

(BY OVERNIGHT DELIVERY) I enclosed the above-referenced document(s) in a sealed envelope or package and caused the above-referenced document(s) to be delivered overnight via an overnight delivery service in lieu of delivery by mail to the addressee(s).

(BY EMAIL OR ELECTRONIC TRANSMISSION) Based on a court order or an agreement of the parties to accept service by email or electronic transmission I caused the above-referenced document(s) to be sent to the persons at the email addresses listed below I did not receive within a reasonable time after the transmission any electronic message or other indication that the transmission was unsuccessful

Executed on January 26, 2016 at Sacramento, California.

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



Janet M. Leonard

City of Corona v. AMG Outdoor Advertising, Inc. et al.
California Court of Appeal, Fourth Appellate District, Division Two
Case Number E062869

REQUEST FOR PUBLICATION
(City of Los Angeles' Request for Publication and Opinion Attached)

SERVICE LIST

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