

*Olins Riviere Coates and Bagula*

2214 SECOND AVENUE • SAN DIEGO, CA 92101 • PHONE (619) 272-4235 • FACSIMILE (619) 272-4309

June 20, 2012

VIA U.S. MAIL

Judge Donn Ginoza  
Public Employment Relations Board  
San Francisco Regional Office  
1330 Broadway, Suite 1532  
Oakland, CA 94612-2514  
Fax: (510) 622-1027

**Re: DCAA Motion to Consolidate**  
**PERB Case No. LA-CE-752-M**

Dear Judge Ginoza:

Deputy City Attorneys Association of San Diego (“DCAA”) filed a motion to consolidate PERB Case No. LA-CE-752-M (DCAA’s charge) with PERB case No. LA-CE-746-M (San Diego Municipal Employees Association’s Charge) on March 5, 2012. DCAA respectfully requests that its charge be consolidated with the San Diego Municipal Employees Association (MEA) charge pursuant to its motion, and that the hearing on the consolidated charges be scheduled on July 17, 18, 20 and 23, or as soon as is possible thereafter.

DCAA filed its charge with PERB on February 15, 2012, and PERB issued a complaint on the charge on March 2, 2012. On March 28, 2012, you issued an “Abeyance Letter” in the matter pursuant to a stay issued by the Superior Court. As outlined in MEA’s letter sent to you yesterday, the Fourth District Court of Appeal issued an opinion directing the Superior Court to vacate its order staying the administrative proceedings and to enter a new order denying the City of San Diego’s motion to stay the proceedings.

DCAA is prepared to go forward on the hearing dates currently reserved for July 17, 18, 20 and 23, and does not oppose consolidation of all of the charges currently before PERB on this issue filed by AFSCME Local 127, MEA, San Diego City Firefighters Local 145, and the DCAA.

PERB Case No. LA-CE-752-M

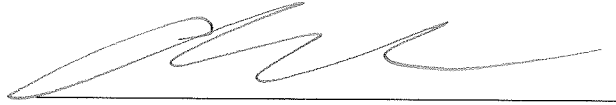
June 20, 2012

Page 2

Thank you for your consideration. I can be reached at (619) 333-2457 should you have any questions or would like to discuss this matter further.

Sincerely,

OLINS RIVIERE COATES AND BAGULA

A handwritten signature in black ink, appearing to read 'Adam Chaikin', written over a horizontal line.

Adam Chaikin

cc: Donald R. Worley, City of San Diego (via email and mail)  
Ann Smith, Attorney for San Diego Municipal Employees Association (via email and mail)  
Fern Steiner, Attorney for San Diego City Firefighters Local 145 (via email and mail)  
Constance Hsiao Attorney for AFSCME Local 127 (via email and mail)