

1 KAMALA D. HARRIS
Attorney General of California
2 ANGELA SIERRA
Senior Assistant Attorney General
3 MICHAEL L. NEWMAN
Supervising Deputy Attorney General
4 CHRISTINE CHUANG
Deputy Attorney General
5 State Bar No. 257214
1515 Clay Street, 20th Floor
6 P.O. Box 70550
Oakland, CA 94612-0550
7 Telephone: (510) 622-2260
Facsimile: (510) 622-2121
8 Email: Christine.Chuang@doj.ca.gov
Attorneys for Respondent
9 *Kamala D. Harris, Attorney General of the State of California*

FILED

MAR 18 2016

JRB

SUPERIOR COURT OF CALIFORNIA
COUNTY OF HUMBOLDT

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11 SUPERIOR COURT OF THE STATE OF CALIFORNIA
12 COUNTY OF HUMBOLDT
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14 In the Matter of the Investigation:

Case No. CV160225

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16 **IN RE HUMBOLDT COUNTY CHILD
PROTECTION AND MANDATORY
REPORTING COMPLIANCE**

**DECLARATION OF DEPUTY
ATTORNEY GENERAL CHRISTINE
CHUANG IN SUPPORT OF
OPPOSITION TO MOTION TO QUASH
INVESTIGATIVE SUBPOENA**

Hearing Date: March 25, 2016
Time: 8:30 a.m.
Dept: 6

FAX FILE

1 I, Christine Chuang, declare as follows:

2 1. I am an attorney licensed to practice before all courts of this State, and am employed
3 by the California Attorney General's office as a Deputy Attorney General. I am one of the
4 attorneys assigned to the Attorney General's investigation into Humboldt County agencies'
5 compliance with California's Child Abuse and Neglect Reporting Act ("CANRA") and one of the
6 attorneys representing Respondent.

7 2. This declaration is based on personal knowledge. If called to testify in this action, I
8 could and would competently testify to the matters set forth herein.

9 3. On March 16, 2016, counsel for Petitioner Department of Health and Human Services
10 ("DHHS") emailed me a copy of its Motion to Quash Investigative Subpoena ("Motion"),
11 informing that it was received by the Juvenile Court on March 15, 2016.

12 4. On March 17, 2016, counsel for DHHS informed me that she was resubmitting and
13 Re-filing the Motion as a Petition for Relief from Subpoena ("Petition") at the clerk's office's
14 request and that she would update me on the hearing schedule for the matter. On March 18, 2016,
15 I called the clerk of the Civil Division of this Court to receive a case number relating to the
16 Motion and Petition, and confirmed with the clerk that the March 25 hearing was still on calendar
17 and that the case was assigned to the Civil Division.

18 5. Although I was not yet been served with a copy of the re-filed Petition, in light of the
19 currently scheduled hearing on March 25, I am filing an Opposition to DHHS's Motion to comply
20 with Local Rule 7.26, which requires a response to a Motion in Juvenile Court 5 court days prior
21 to the hearing.

22 I declare under penalty of perjury that the foregoing is true and correct, and that this
23 declaration was executed on March 18, 2016, in Oakland, California.

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26 Christine Chuang
27 Deputy Attorney General
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