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5 738 South Mariposa Ave. #203
6 Los Angeles, CA 90005

7 Plaintiff,
8 IN PRO PER

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 LOS ANGELES COUNTY

11 DES MANTTARI,

12 Plaintiff/Petitioner,

13 vs.

14 SANTA MONICA COMMUNITY
15 COLLEGE DISTRICT, CHUI L. TSANG,
16 AND DOES 1-20, INCLUSIVE.

17 Defendants/Respondents.
18

19) Case No. BS104928

20) **ORDER FOR INJUNCTIVE RELIEF**

21 The Defendants/Respondents Santa Monica Community College District (hereinafter,
22 “SMCCD”), Chui L. Tsang, and DOES 1-20, inclusive, and each of them and their agents,
23 servants, and employees, and all persons acting under, in concert with, or for
24 Defendants/Respondents are hereby ordered to provide Plaintiff/Petitioner with copies of the
25 following records on payment of a fee covering the costs to SMCCD of providing such copies:

26 **RECORDS:**

27
28 **ORDER FOR INJUNCTIVE RELIEF**
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1 1. Any and all administrative regulations, board policies, or other documents pertaining
2 to student conduct, including disruption and disruptive behavior.

3 2. Any and all administrative regulations, board policies, or other documents pertaining
4 to Santa Monica College's harassment policies, anti-harassment policies, and sexual
5 harassment policies.
6

7 3. Any and all administrative regulations, board policies, or other documents pertaining
8 to Santa Monica College's discrimination policies, anti-discrimination policies, disability
9 discrimination policies, and policies that may fall into this category.
10

11 4. Any and all administrative regulations, board policies, or other documents pertaining
12 to Santa Monica College's Free Speech Area or free speech zones, including any
13 determinations made, maps, diagrams, or other identifying documents.
14

15 5. Any and all documents pertaining to the SMC Game Club, the SMC Gaming Club,
16 and the Academy Gaming Club for the period between 2003 to the present, including by-
17 laws, constitutions, recommendations, approvals, reprimands, restrictions, lists of officers,
18 lists of faculty advisors or co-advisors, request for funding, funding approval, minutes of
19 meetings, and agendas.
20

21 6. Any and all documents pertaining to any and all studies initiated by the Vice
22 President of Student Affairs to determine the increase in discipline cases and recommended
23 mitigation strategies as set forth in Plan-IIA.7(b) of Standard II: Student Learning Programs
24 and Services, SMC's Policies, Accreditation Self-Study Standard II from 2004 to the present.
25

26 7. Any and all documents pertaining to any and all reviews of data from the college
27 disciplinarian, ombudspersons and the College Police, revealing that the number of student
28

29 **ORDER FOR INJUNCTIVE RELIEF**

1 referrals and staff investigations has significantly increased and the reported causes of such
2 as set forth in Evaluation-IIA.7(b) of Standard II: Student Learning Programs and Services,
3 SMC's Policies, Accreditation Self-Study Standard II from 2004 to the present.
4

5 8. Any and all documents pertaining to any and all studies to determine the causes for
6 the rise in number of discipline cases and the strategies developed to address these concerns
7 as set forth in the SMC Evaluation Report, SMC's Policies, Santa Monica Team Report
8 March 2004 for the period of March 2004 to the present, inclusive.
9

10 9. Any and all documents pertaining to student grievance procedures, policies,
11 regulations, and investigations.

12 10. Any and all administrative regulations, board policies, or other documents pertaining
13 to Santa Monica College's due process rights of students, including disciplinary proceedings.
14

15 11. Any and all administrative regulations, board policies, or other documents pertaining
16 to Santa Monica College's students rights to free speech and free expression on campus,
17 including any restrictions and guarantees of such.

18 12. Contract with Animatics (as described in the Board of Trustees minutes, Consent
19 Agenda, Recommendation No. 12, dated April 3, 2000) and all related documents re:
20 economic development virtual multimedia /entertainment center grant.
21

22 13. Any and all documents regarding the \$125,000 GTE grant given to Santa Monica
23 College on or about December 1996 for the purpose of creating a videoconferencing center,
24 including grant awards, invoices, purchase orders, expenditures, or other relevant documents
25 pertaining to the videoconferencing center including, but not limited to, classes taught,
26 services provided, and specialized training to area businesses at their sites.
27

28 **ORDER FOR INJUNCTIVE RELIEF**
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1 14. Any and all documents regarding the \$125,000 GTE grant given to Santa Monica
2 College for the purpose of creating a videoconferencing center, including grant awards,
3 invoices, purchase orders, expenditures, or other relevant documents pertaining to the
4 videoconferencing center.
5

6 15. Any and all documents regarding the contract with Broadband Multimedia for the
7 period of November 12, 2001 through January 15, 2002, in an amount not to exceed \$30,000
8 to research, plan, and design a set of software tools that will facilitate and enable ADA
9 Section 508 compliance for multimedia produced by SMC under the Title III and Virtual
10 Multimedia grants as set forth in SMC's Board of Trustee Minutes and Agendas for
11 November 5, 2001, including but not limited to all grants, contracts, consultant contracts,
12 receipts, invoices, purchase orders, required tax disclosures, final reports, progress reports, or
13 other reports and documentation, including a list of individuals who participated or oversaw
14 this project.
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17 16. Any and all documents pertaining to the number of vocational certificates,
18 occupational certificates, or career certificates awarded at the Academy of Entertainment and
19 Technology from 1997 to the present.
20

21 17. Any and all documents pertaining to the number of vocational certificates,
22 occupational certificates, or career certificates awarded at the Academy of Entertainment and
23 Technology from 1997 to the present in the area of Themed Entertainment, Theme Park
24 Entertainment and/or Theme Park Management.
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26 18. Any and all documents pertaining to the number of vocational certificates,
27 occupational certificates, or career certificates awarded at the Academy of Entertainment and
28

29 **ORDER FOR INJUNCTIVE RELIEF**

1 Technology from 1997 to the present in the area of Entertainment Business, Entertainment
2 Industry Business, and/or Entertainment Industry Accounting.

3 19. Any and all documents pertaining to the number of vocational certificates,
4 occupational certificates, or career certificates awarded at the Academy of Entertainment and
5 Technology from 1997 to the present in the area of New Media, and/or Interactive Media.

6 20. Any and all documents pertaining to the number of vocational certificates,
7 occupational certificates, or career certificates awarded at the Academy of Entertainment and
8 Technology from 1997 to the present in the area of Computer Animation, 3D Animation, and/or
9 and/or traditional 2D animation.

10 21. Any and all documents pertaining to the number of vocational certificates,
11 occupational certificates, or career certificates awarded at the Academy of Entertainment and
12 Technology from 1997 to the present in the area of Gameworks, Game Works, Game Design
13 and/or Game Development.

14 22. Any and all documents pertaining to the number of vocational certificates,
15 occupational certificates, or career certificates awarded at the Academy of Entertainment and
16 Technology from 1997 to the present in the area of Web Design and/or Web Development.

17 23. Any and all documents pertaining to Judith Penchansky's salary, job duties, job
18 description, contracts, terms and dates of employment as it pertains to her role as Assistant
19 Dean, Student Affairs for External Programs as set forth in the Academy of Entertainment
20 and Technology official website from her time of employment in such capacity until its
21 termination, resignation, or transfer, including dates of employment.
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28 **ORDER FOR INJUNCTIVE RELIEF**
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1 24. Any and all documents pertaining to Judith PENCHANSKY's salary, job duties, job
2 description, contracts, terms and dates of employment as it pertains to her role as Assistant
3 Dean, Judicial Affairs from her time of employment in such capacity until the present,
4 including dates of employment.
5

6 25. Any and all documents pertaining to Robert SAMMIS's salary, job duties, job
7 description, contracts, terms and dates of employment as it pertains to his role as Vice-
8 President of Human Resources from the period between 1998 through 2004, inclusive.
9

10 26. Any and all documents pertaining to Robert SAMMIS's salary, job duties, job
11 description, contracts, terms and dates of employment as it pertains to his role as Vice-
12 President of Planning and Development from his time of employment in such capacity until
13 the present.
14

15 27. Any and all documents pertaining to Robert ADAM's salary, job duties, job
16 description, contracts, terms and dates of employment as it pertains to his role as Vice-
17 President of Student Affairs from his time of employment in such capacity until the present.
18

19 28. Any and all documents pertaining to Denya HEARN's salary, job duties, job
20 description, contracts, terms and dates of employment as it pertains to her role as Assistant
21 Dean of Student Life from his time of employment in such capacity until the present.
22

23 29. Any and all documents pertaining to James F. KEESHEN's salary, job duties, job
24 description, contracts, terms and dates of employment as it pertains to his role as faculty from
25 his time of employment in such capacity until the present.
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28 **ORDER FOR INJUNCTIVE RELIEF**
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1 30. Any and all documents pertaining to David Javelosa's salary, job duties, job
2 description, contracts, terms and dates of employment as it pertains to his role as faculty from
3 his time of employment in such capacity until the present.

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5 31. Any and all documents pertaining to Howard A. Stahl's salary, job duties, job
6 description, contracts, terms and dates of employment as it pertains to his role as faculty from
7 his time of employment in such capacity until the present.

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9 32. Any and all documents pertaining to Chui L. Tsang's salary, job duties, job
10 description, contracts, terms and dates of employment as it pertains to his role as
11 President/Superintendent from his time of employment in such capacity until the present.

12 33. Any and all documents pertaining to successful job placement of graduates from the
13 Academy of Entertainment & Technology, including freelance jobs, from 2005 to the
14 present.

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16 34. Any and all documents pertaining to internship placements of students from the
17 Academy of Entertainment & Technology, including paid internships and non-paid
18 internships, from 2005 to the present.

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20 35. Any and all documents pertaining to information and enrollment figures of full-time
21 students (FTE) and part-time students at SMC's Academy of Entertainment & Technology
22 for the following semesters: Winter 2006, Spring 2006, Summer 2006, and Fall 2006,
23 respectively.

24
25 36. Any and all documents pertaining to information and data as to the number of
26 disruptive student complaints received to Judith Penchansky and the Office of Judicial
27 Affairs in the year 2006.

28 **ORDER FOR INJUNCTIVE RELIEF**

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1 37. Any and all documents pertaining to information and data as to the number of
2 disruptive student complaints received to Judith Penchansky and the Office of Judicial
3 Affairs in the year 2005.

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5 38. Any and all documents pertaining to information and data as to the number of
6 disruptive student complaints received to Judith Penchansky and the Office of Judicial
7 Affairs in the year 2004.

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9 39. Any and all documents pertaining to information and data as to the number of
10 disruptive student complaints received to Judith Penchansky and the Office of Judicial
11 Affairs in the year 2003.

12 40. Any and all documents pertaining to information and data as to the number of
13 disruptive student complaints received to Judith Penchansky and the Office of Judicial
14 Affairs in the year 2002.

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16 41. Any and all documents pertaining to information and data as to the number of
17 disabled students, including students with perceived disabilities, who were suspended from
18 Santa Monica in the year 2006.

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20 42. Any and all documents pertaining to information and data as to the number of
21 disabled students, including students with perceived disabilities, who were suspended from
22 Santa Monica in the year 2005.

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24 43. Any and all documents pertaining to information and data as to the number of
25 disabled students, including students with perceived disabilities, who were suspended from
26 Santa Monica in the year 2004.

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28 **ORDER FOR INJUNCTIVE RELIEF**
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1 44. Any and all documents pertaining to information and data as to the number of
2 disabled students, including students with perceived disabilities, who were suspended from
3 Santa Monica in the year 2003.
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5 45. Any and all documents pertaining to information and data as to the number of
6 disabled students, including students with perceived disabilities, who were suspended from
7 Santa Monica in the year 2002.
8

9 46. Any and all documents pertaining to information and data as to the number of
10 disabled students, including students with perceived disabilities, who were expelled from
11 Santa Monica in the year 2006.
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13 47. Any and all documents pertaining to information and data as to the number of
14 disabled students, including students with perceived disabilities, who were expelled from
15 Santa Monica in the year 2005.
16

17 48. Any and all documents pertaining to information and data as to the number of
18 disabled students, including students with perceived disabilities, who were expelled from
19 Santa Monica in the year 2004.
20

21 49. Any and all documents pertaining to information and data as to the number of
22 disabled students, including students with perceived disabilities, who were expelled from
23 Santa Monica in the year 2003.
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25 50. Any and all documents pertaining to information and data as to the number of
26 disabled students, including students with perceived disabilities, who were expelled from
27 Santa Monica in the year 2002.
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29 **ORDER FOR INJUNCTIVE RELIEF**

1 51. Any and all documents pertaining to information and data as to the number of
2 students who received an immediate interim suspension from Santa Monica in the year 2006.

3 52. Any and all documents pertaining to information and data as to the number of
4 students who received an immediate interim suspension from Santa Monica in the year 2005.

5 53. Any and all documents pertaining to information and data as to the number of
6 students who received an immediate interim suspension from Santa Monica in the year 2004.

7 54. Any and all documents pertaining to information and data as to the number of
8 students who received an immediate interim suspension from Santa Monica in the year 2003.

9 55. Any and all documents pertaining to information and data as to the number of
10 students who received an immediate interim suspension from Santa Monica in the year 2002.

11 56. Any and all documents pertaining to information and data as to the number of
12 students suspended from Santa Monica College for the duration of less than one semester in
13 the year 2006.

14 57. Any and all documents pertaining to information and data as to the number of
15 students suspended from Santa Monica College for the duration of less than one semester in
16 the year 2005.

17 58. Any and all documents pertaining to information and data as to the number of
18 students suspended from Santa Monica College for the duration of less than one semester in
19 the year 2004.

20 59. Any and all documents pertaining to information and data as to the number of
21 students suspended from Santa Monica College for the duration of less than one semester in
22 the year 2003.

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28 **ORDER FOR INJUNCTIVE RELIEF**

1 60. Any and all documents pertaining to information and data as to the number of
2 students suspended from Santa Monica College for the duration of less than one semester in
3 the year 2002.
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5 61. Any and all documents pertaining to information and data as to the number of
6 students suspended from Santa Monica College for the duration of one semester in the year
7 2006.
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9 62. Any and all documents pertaining to information and data as to the number of
10 students suspended from Santa Monica College for the duration of one semester in the year
11 2005.
12

13 63. Any and all documents pertaining to information and data as to the number of
14 students suspended from Santa Monica College for the duration of one semester in the year
15 2004.
16

17 64. Any and all documents pertaining to information and data as to the number of
18 students suspended from Santa Monica College for the duration of one semester in the year
19 2003.
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21 65. Any and all documents pertaining to information and data as to the number of
22 students suspended from Santa Monica College for the duration of one semester in the year
23 2002.
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25 66. Any and all documents pertaining to information and data as to the number of
26 students suspended from Santa Monica College for the duration of two semesters in the year
27 2006.
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29 **ORDER FOR INJUNCTIVE RELIEF**

1 67. Any and all documents pertaining to information and data as to the number of
2 students suspended from Santa Monica College for the duration of two semesters in the year
3 2005.

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5 68. Any and all documents pertaining to information and data as to the number of
6 students suspended from Santa Monica College for the duration of two semesters in the year
7 2004.

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9 69. Any and all documents pertaining to information and data as to the number of
10 students suspended from Santa Monica College for the duration of two semesters in the year
11 2003.

12 70. Any and all documents pertaining to information and data as to the number of
13 students suspended from Santa Monica College for the duration of two semesters in the year
14 2002.

15
16 71. Any and all documents pertaining to information and data as to the number of
17 students suspended from Santa Monica College for the duration of three semesters in the year
18 2006.

19
20 72. Any and all documents pertaining to information and data as to the number of
21 students suspended from Santa Monica College for the duration of three semesters in the year
22 2005.

23
24 73. Any and all documents pertaining to information and data as to the number of
25 students suspended from Santa Monica College for the duration of three semesters in the year
26 2004.

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28 **ORDER FOR INJUNCTIVE RELIEF**
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1 74. Any and all documents pertaining to information and data as to the number of
2 students suspended from Santa Monica College for the duration of three semesters in the year
3 2003.

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5 75. Any and all documents pertaining to information and data as to the number of
6 students suspended from Santa Monica College for the duration of three semesters in the year
7 2002.

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9 76. Any and all documents pertaining to information and data as to the number of
10 students suspended from Santa Monica College for the duration of four semesters in the year
11 2006.

12 77. Any and all documents pertaining to information and data as to the number of
13 students suspended from Santa Monica College for the duration of four semesters in the year
14 2005.

15
16 78. Any and all documents pertaining to information and data as to the number of
17 students suspended from Santa Monica College for the duration of four semesters in the year
18 2004.

19
20 79. Any and all documents pertaining to information and data as to the number of
21 students suspended from Santa Monica College for the duration of four semesters in the year
22 2003.

23
24 80. Any and all documents pertaining to information and data as to the number of
25 students suspended from Santa Monica College for the duration of four semesters in the year
26 2002.

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28 **ORDER FOR INJUNCTIVE RELIEF**
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1 81. Any and all documents pertaining to information and data as to the number of
2 students suspended from Santa Monica College for the duration of two or more years in the
3 year 2006.
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5 82. Any and all documents pertaining to information and data as to the number of
6 students suspended from Santa Monica College for the duration of two or more years in the
7 year 2005.
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9 83. Any and all documents pertaining to information and data as to the number of
10 students suspended from Santa Monica College for the duration of two or more years in the
11 year 2004.
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13 84. Any and all documents pertaining to information and data as to the number of
14 students suspended from Santa Monica College for the duration of two or more years in the
15 year 2003.
16

17 85. Any and all documents pertaining to information and data as to the number of
18 students suspended from Santa Monica College for the duration of two or more years in the
19 year 2002.
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21 86. Any and all documents pertaining to information and data as to the number of
22 students expelled from Santa Monica College in the year 2006.
23

24 87. Any and all documents pertaining to information and data as to the number of
25 students expelled from Santa Monica College in the year 2005.
26

27 88. Any and all documents pertaining to information and data as to the number of
28 students expelled from Santa Monica College in the year 2004.
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ORDER FOR INJUNCTIVE RELIEF

1 89. Any and all documents pertaining to information and data as to the number of
2 students expelled from Santa Monica College in the year 2003.

3 90. Any and all documents pertaining to information and data as to the number of
4 students expelled from Santa Monica College in the year 2002.
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7 It is so ordered:
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10 Dated: _____
11 _____
12 Judge, Superior Court of Los Angeles County
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28 **ORDER FOR INJUNCTIVE RELIEF**
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