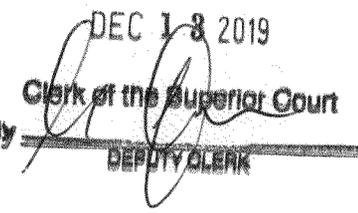


FILED
SAN MATEO COUNTY

DEC 18 2019

Clerk of the Superior Court

By 
DEPUTY CLERK

1 THOMAS D. ROTH, SBN 208601
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4 Attorney for Petitioners and Plaintiffs
5 CASA MIRA HOMEOWNERS' ASSOCIATION AND ITS MEMBERS,
AS SPECIFIED HEREIN

7 SUPERIOR COURT OF CALIFORNIA

8 IN AND FOR THE COUNTY OF SAN MATEO

9
10 CASA MIRA HOMEOWNERS
ASSOCIATION, a California non-profit
11 mutual benefit corporation, on its behalf
and on behalf of the Association members,
12 Petitioners and Plaintiffs,

13 ROBERT D. GLYNN, JR., and KATHLEEN
O. GLYNN, as TRUSTEES of the GLYNN
14 1994 REVOCABLE TRUST AGREEMENT,
dated March 15, 1994, and GLYNN 1994
15 REVOCABLE TRUST AGREEMENT, dated
March 15, 1994, each as a member of the
16 Casa Mira Homeowners' Association and
individually,

17 Petitioners and Plaintiffs,

18 PAULA SKINNER, KAREN PEARLMAN,
and CHRISTEN AGNELLO, each as a
19 member of Casa Mira Homeowners'
Association and individually

20 Petitioners and Plaintiffs,

21 WILLIAM V. REGAN III and ANN
22 WILLIAMS REGAN, as TRUSTEES of the
REGAN REVOCABLE TRUST dated
23 December 29, 1992, and the REGAN
REVOCABLE TRUST dated December 29,
24 1992, each as a member of the Casa Mira
Homeowners' Association and
25 individually,

26 Petitioners and Plaintiffs,
27
28

Case No.: 19-CIV-04677

VERIFIED SECOND AMENDED
PETITION FOR WRIT OF
ADMINISTRATIVE MANDAMUS
(C.C.P. § 1094.5) AND/OR
TRADITIONAL MANDAMUS (C.C.P. §
1085);

COMPLAINT FOR INVERSE
CONDEMNATION, DECLARATORY
AND INJUNCTIVE RELIEF; and

DEMAND FOR JURY TRIAL

19 - CIV - 04677
ACM2
Second Amended Complaint
2168876



1 STUART M. SCHLISSERMAN, as
2 TRUSTEE of the STUART MARK
3 SCHLISSERMAN REVOCABLE TRUST
4 dated April 14, 2004, and the STUART
5 MARK SCHLISSERMAN REVOCABLE
6 TRUST dated April 14, 2004, each as a
7 member of the Casa Mira Homeowners'
8 Association and individually,
9 Petitioners and Plaintiffs,

10 TARANEH RAZAVI, as TRUSTEE of the
11 TARANEH RAZAVI LIVING TRUST dated
12 September 29, 2009, and the TARANEH
13 RAZAVI LIVING TRUST dated September
14 29, 2009, each as a member of the Casa Mira
15 Homeowners' Association and
16 individually,
17 Petitioners and Plaintiffs,

18 KELLY ANN KRAMER, as TRUSTEE of the
19 KELLY ANN KRAMER 2017 TRUST under
20 Declaration of Trust dated July 18, 2017,
21 and the KELLY ANN KRAMER 2017
22 TRUST under Declaration of Trust dated
23 July 18, 2017, each as a member of the Casa
24 Mira Homeowners' Association and
25 individually,
26 Petitioners and Plaintiffs,

27 GREGG E. MILLER, as TRUSTEE of the
28 MILLER SURVIVOR'S TRUST dated April
5, 1993, and the MILLER SURVIVOR'S
TRUST dated April 5, 1993, each as a
member of the Casa Mira Homeowners'
Association and individually,
Petitioners and Plaintiffs,

GIAN D. POLASTRI and ROBIN M.
POLASTRI, as TRUSTEES of the TRUST OF
GIAN AND ROBIN POLASTRI, dated
April 7, 2001, and the TRUST OF GIAN
AND ROBIN POLASTRI, dated April 7,
2001, each as a member of the Casa Mira

1 Homeowners' Association and
2 individually,

3 Petitioners and Plaintiffs,

4 RODERICK A. YOUNG and CHARLOTTE
5 D. JACOBS, as TRUSTEES of the
6 YOUNG/JACOB 1998 TRUST, and the
7 YOUNG/JACOB 1998 TRUST, each as a
8 member of the Casa Mira Homeowners'
9 Association and individually,

10 Petitioner and Plaintiff,

11 GUSTAVINO HOLDINGS, LLC, a
12 California limited liability company, solely
13 as a member of the Casa Mira
14 Homeowners' Association and not
15 individually,

16 Petitioner and Plaintiff,

17 MICHAEL PATRICK SULLIVAN, JR., as
18 Successor Trustee of the MAVIS R.
19 SULLIVAN DECLARATION OF TRUST
20 dated October 21, 2015, the MAVIS R.
21 SULLIVAN DECLARATION OF TRUST
22 dated October 21, 2015, KIM M. THOMAS,
23 MICHAEL PATRICK SULLIVAN, JR.,
24 KERRY SULLIVAN, JAMIE SULLIVAN,
25 ASHLEY SULLIVAN, and MAGGIE SUE
26 SULLIVAN, each named solely as a
27 member of the Casa Mira Homeowners'
28 Association and not individually,

 Petitioners and Plaintiffs,

 vs.

 CALIFORNIA COASTAL COMMISSION,
 an agency of the State of California, and
 DOES 1-50, inclusive,

 Respondent and Defendant,

 JOHN (JACK) AINSWORTH, in his official
 capacity as Executive Director of the
 California Coastal Commission, and DOES

1 1-50, inclusive,

2 Respondent and Defendant,

3 CALIFORNIA DEPARTMENT OF PARKS
4 AND RECREATION, a department of the
5 State of California, and DOES 1-50,
6 inclusive,

7 Real Party-in-Interest,

8 CITY OF HALF MOON BAY, a charter city,
9 and DOES 1-50, inclusive,

10 Real Party-in-Interest,

11 GRANADA COMMUNITY SERVICES
12 DISTRICT, a special district formed under
13 California Government Code § 61000, and
14 DOES 1-50, inclusive,

15 Real Party-in-Interest,

16 TOP OF MIRADA, LLC, a California
17 limited liability company, and JENNIFER
18 THOMAS, an individual, and DOES 1-50,
19 inclusive,

20 Real Parties-in-Interest,

21 IRINA VLASSOVA PLACE, an individual,
22 and DOES 1-50, inclusive,

23 Real Party-in-Interest,

24 WILLIAM S. EASTERLING, and
25 DARLENE INEZ CASTRO-EASTERLING,
26 as TRUSTEES of THE EASTERLING
27 REVOCABLE TRUST UTA dated July 11,
28 2000, and THE EASTERLING
REVOCABLE TRUST UTA dated July 11,
2000, and DOES 1-50, inclusive,

Real Parties-in-Interest, and

