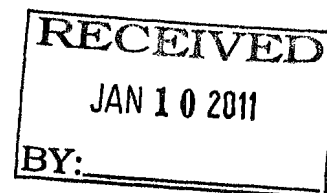


CARROLL EDWARD PEIFFER
ATTORNEY AT LAW

January 7, 2011

Certified Mail



Heather Foster, Clerk of the Board
Sierra County Board of Supervisors
P.O. Drawer "D"
100 Courthouse Square, Suite 11
Downieville, CA 95936

Re: Notice of Claim Against Government Entity (Gov. Code 910 et seq.)
COUNTY OF SIERRA, SIERRA COUNTY HUMAN SERVICES/SOCIAL SERVICES
DEPARTMENT

Dear Madame Clerk:

I represent Jill M. Molaris. I have enclosed a Notice of Claim Against Public Entity (Gov. Code § 910 et seq.), specifically County of Sierra, Sierra County Human Services/Social Services Department. Please file the original and return the copy in the self-addressed, stamped envelope that I have provided. Thank you.

Sincerely,

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke extending to the right.

Carroll Edward Peiffer

FILED

JAN 10 2011

1 **Name and Address of Claimant:**
JILL MARIE MOLARIS
2 c/o CARROLL EDWARD PEIFFER
Attorney at Law
3 The Historic McCoy House
216 5th Street
4 Marysville, CA 95901
(530)749-9538

HEATHER FOSTER, COUNTY CLERK
By: 

2011/001

5
6 **NOTICE OF CLAIM AGAINST PUBLIC ENTITY**
COUNTY OF SIERRA, SIERRA COUNTY
7 **HUMAN SERVICES/SOCIAL SERVICES DEPARTMENT**
(Cal. Government Code Section 910 et seq.)

8 1. The claim is primarily founded on a cause of action under 42 U.S.C. Section 1983 to redress
9 the deprivation by defendants, at all times acting under color of state law, of rights secured to plaintiffs
10 under the United States Constitution, including the First, Fourth, and Fourteenth Amendments, and state
11 law where applicable. Said cause of action, which accrued on or about August 20, 2010, and are ongoing.

12 2. This claim arises from an investigation and proceedings of a juvenile dependency investigation
13 pursuant to Chapter 2 (commencing with Section 200) of Part 1 of Division 2 of the Welfare and
14 Institutions Code initiated or conducted by Defendants, COUNTY OF SIERRA (hereinafter "COUNTY"),
15 also known as, or referred to as, SIERRA COUNTY HUMAN SERVICES/SOCIAL SERVICES
16 DEPARTMENT (hereinafter "DEPARTMENT") regarding Plaintiff minors, J.P. (hereinafter "J.P.") and
17 M.P. (hereinafter "M.P.") and affecting her parent, Plaintiff JILL MARIE MOLARIS, (hereinafter
18 "JILL").

19 3. Defendant COUNTY OF SIERRA is a municipality, organized and operating under the laws
20 of California.

21 4. Children's Protective Services ("CPS") is a COUNTY governmental agency organized and
22 existing pursuant to the law and policies of defendant SIERRA COUNTY, which promulgated,
23 encouraged, administered, and/or permitted, the policies, practices, customs, and procedures under which
24 the individual defendant employees committed the acts or omissions complained of herein, and either
25 intentionally or negligently, whether as a result of policies, practices, customs, or procedures, or as a
26 result of ineffective, non-existent, or inadequate training and education of employees, caused or were
27 otherwise responsible for the acts or omissions of said employees as complained of herein, and plaintiffs

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1 allege that the policies, practices, customs, and/or procedures of COUNTY, as determined and effected
2 in the circumstances complained of herein by the individual defendants, constitute and/or engender a
3 circumstance and/or environment of deliberate indifference to the rights and safety of citizens of the
4 community, of families, and of children. The entities are referred to interchangeably herein as COUNTY.

5 5. Defendant JAMES CURTIS ("CURTIS"), whose acts as alleged herein were performed under
6 color of state law, was at all times material hereto, upon Plaintiffs' information and belief, the attorney
7 for the COUNTY.

8 6. Defendant CAROL ROBERTS ("ROBERTS"), whose acts as alleged herein were performed
9 under color of state law, was at all times material hereto, upon Plaintiffs' information and belief, the
10 Social Services Director of the DEPARTMENT, employed by COUNTY, and/or a supervisor of social
11 worker supervisor JAMES MARKS and social worker JODI BENSON.

12 7. Defendant JAMES MARKS("MARKS"), whose acts as alleged herein were performed under
13 color of state law, was at all times material hereto, upon Plaintiffs' information and belief, a social worker
14 supervisor for the DEPARTMENT and employed by COUNTY.

15 8. Defendant JODI BENSON("BENSON"), whose acts as alleged herein were performed under
16 color of state law, was at all times material hereto, upon Plaintiffs' information and belief, a social worker
17 for the DEPARTMENT and employed by COUNTY.

18 9. COUNTY is individually liable for damages sustained as the result of the incidents and
19 circumstances set forth herein below, as the conduct, acts, and omissions to act of the individual
20 defendants was pursuant to a custom, policy, practice, or procedure of COUNTY under which the
21 individual defendant employees committed and either intentionally or negligently, caused or were
22 otherwise responsible for, the acts or omissions of said defendants as complained of herein.

23 10. Plaintiffs are informed and believe and, based upon such information and belief, allege that,
24 at all times herein mentioned, each and every defendant was the agent and/or employee of one or all other
25 defendants, and was acting either in their individual capacity or in the scope, purpose and authority of
26 COUNTY and/or CPS and/or in their employment or agency with said entities, and with the knowledge,
27

1 permission, ratification, and/or consent of said co-defendants and/or entities.

2 11. Defendants knowingly and willingly, with a common intent and scheme set forth in further
3 detail herein below, conspire to injure plaintiffs, and deprive plaintiffs of their rights, liberties, and
4 interests, as such rights are afforded them under the United States Constitution, and the California State
5 Constitution, and conspired generally to damage said plaintiffs and inflict great injury upon them, with
6 the intent of causing, and so causing, a violation of their rights under the U.S. Constitution and/or
7 California State Constitution.

8 12. ROBERTS, BENSON, MARKS, CURTIS, and/or the other individually named social workers
9 and/or supervisors herein above, as well as unknown individuals and employees of CPS/COUNTY, failed
10 and refused to disclose exculpatory information in their possession that contradicted or mitigated the
11 allegations in the status review reports which CPS/COUNTY requested the court follow, so that could
12 remain in the custody of CPS/COUNTY.

13 13. MARKS conspired with the other individually named defendants, and unknown DOE
14 defendants, including but not limited to ROBERTS and BENSON, and others yet unknown, to lie, make
15 false allegations, obfuscate, and withhold evidence, so as to obtain a juvenile court ruling continuing the
16 children in their dependent status, and under the care, custody and control of COUNTY. All of said
17 actions were undertaken for purposes not related to the health, safety, and welfare of, and in contravention
18 thereof, Plaintiff minors, J.P. and M.P. and affecting their parent, JILL.

19 14. Plaintiffs allege that the continuing dependency status of J.P. and M.P. was accompanied and
20 caused by said defendants malicious intent, gross recklessness, and deliberate indifference to the familial
21 rights or plaintiffs, and manifested in, but not limited to, the complete failure or refusal of defendants to
22 reasonably investigate the circumstances of the family and the statements made by Social Worker JEAN
23 NEWFARMER FLETCHER (hereinafter SW FLETCHER), Plaintiff minors, J.P. and M.P. and their
24 mother JILL of failing or refusing to report and/or follow up on any of the information provided by SW
25 FLETCHER, intentionally withholding exculpatory or contradictory information obtained from the parent
26 and other sources, including SW FLETCHER related to the allegations in the status review reports
27

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1 submitted to the court, and in fabricating, stating out of context or in an otherwise intentionally
2 misleading partial and/or incomplete manner relating the statements of Plaintiffs and circumstances
3 surrounding the obtaining of the statements of Plaintiffs and others in an effort to mislead the court and
4 with deliberate indifference to the familial rights and bonds of the plaintiffs, maintain J.P. and M.P. in
5 the care, custody, and control of COUNTY/CPS.

6 15. On or about August 20, 2010, MARKS requested SW FLETCHER to prepare a progress
7 report in the dependency proceeding involving the Plaintiffs. SW FLETCHER prepared the report as
8 requested in her “standard fashion—straight and to the point,” as noted in her Claim Against the County
9 of Sierra, attached hereto as “Exhibit A.” MARKS was dissatisfied with the report prepared by SW
10 FLETCHER and rewrote the report and submitted it to CURTIS. SW FLETCHER reviewed the rewritten
11 report by MARKS and felt that it was inaccurate and dishonest. SW FLETCHER informed CURTIS of
12 what had taken place and he assured SW FLETCHER that the case would not be railroad as MARKS
13 desired. On or about September 22, 2010, MARKS prepared a CPS Report that contained numerous
14 untruths and harsh, unjustified recommendations, according to SW FLETCHER. SW FLETCHER
15 refused to sign the report and was removed as the case worker. Furthermore, the signing of the report by
16 MARKS was done so without personal knowledge and without any justifiable basis as to Plaintiff JILL,
17 and is not protected under *Beltram v. Santa Clara County*, 514 F. 3d 906 (2008) (wherein the 9th Circuit
18 held that a social worker is not entitled to absolute immunity for claims that they fabricated evidence
19 during an investigation or made false statements in a dependency petition affidavit that they signed under
20 penalty of perjury).

21 16. Plaintiffs are not able to completely identify all the false, misrepresented and/or withheld
22 evidence in the records, reports, and documents of COUNTY and DEPARTMENT as a Welfare and
23 Institutions § 827 Petition for access to such items is pending and being processed at this time.

24 17. SW FLETCHER as well as other Health & Human Services Department Employees were
25 subpoenaed by the Plaintiff JILL’s attorney for a hearing on October 27, 2010. ROBERTS, falsely
26 informed CURTIS that the Office Assistant was unable to attend the hearing. ROBERTS made such false
27

1 representations in order to exclude any evidence in Plaintiff JILL's favor, according the SW FLETCHER.

2 18. Each of said defendants are individuals described in Government Code §820.21(a), and each
3 of them, in committing repeated violations of Government Code §820.21, did commit perjury, make
4 misrepresentations to the court, fabricate evidence and fail to include exculpatory evidence in reports to
5 the court or in discovery under California Rules of Court 1420 to the parents and their counsel. All such
6 conduct was undertaken with malicious intent or reckless disregard for the rights and safety of the
7 plaintiffs. Government Code 820.21(a) states:

8
9 (a) Notwithstanding any other provision of the law, the civil immunity of juvenile court social
10 workers, child protection workers, and other public employees authorized to initiate or conduct
11 investigations or proceedings pursuant to Chapter 2 (commencing with Section 200) of Part 1 of
12 Division 2 of the Welfare and Institutions Code shall not extend to any of the following, if
13 committed with malice:

14 (1) Perjury.

15 (2) Fabrication of evidence.

16 (3) Failure to disclose known exculpatory evidence.

17 (4) Obtaining testimony by duress, as defined in Section 1569 of the Civil Code, fraud, as defined
18 in either Section 1572 or Section 1573 of the Civil Code, or undue influence, as defined in
19 Section 1575 of the Civil Code.

20 (b) As used in this section, "malice" means conduct that is intended by the person described in
21 subdivision (a) to cause injury to the plaintiff or despicable conduct that is carried on by the
22 person described in subdivision (a) with a willful and conscious disregard of the rights or safety
23 of others.

24 19. The acts of said defendants interfered or attempted to interfere with the plaintiffs exercise of
25 their constitutional rights thereby entitling plaintiffs, and each of them, to compensatory damages, and
26 punitive damages, in addition to a statutory civil penalty of \$ 25,000.00 and attorneys' fees, all of which
27 are provided for in Civil Code §52.1(b)

28 20. In doing the acts alleged herein, defendants knew or should have known, that their actions
were likely to injure plaintiffs, and plaintiffs are informed and believe, and thereon alleges, that the
COUNTY, and the individually named defendants, intended to cause injury to plaintiffs and acted with
a willful, conscious, and deliberate disregard of plaintiffs' rights as secured by Civil Code §52.1, thus
entitling plaintiffs to recover punitive damages pursuant to Civil Code §52(b)1, which provides:

1 (b) Any individual whose exercise or enjoyment of rights secured by the Constitution or
2 laws of the United States, or of rights secured by the Constitution or laws of this state, has
3 been interfered with, or attempted to be interfered with, as described in subdivision (a),
4 may institute and prosecute in his or her own name and on his or her own behalf a civil
action for damages, including, but not limited to, damages under Section 52, injunctive
relief, and other appropriate equitable relief to protect the peaceable exercise or enjoyment
of the right or rights secured.

5 21. The attempted removal and detention of Plaintiffs J.P. and M.P.. from the care and custody
6 of Plaintiff JILL, their mother, pursuant to a Supplemental Petition under Section 387 of the Welfare &
7 Institutions Code, by the joint actions of the aforementioned Agents of the Defendant COUNTY, based
8 on false information and allegations, or probable, reasonable or just cause, and in the absence of imminent
9 danger of serious bodily injury to Plaintiffs J.P. and M.P., was in violation of clearly established legal
10 authority in Mabe v. San Bernardino County, Dept. Of Pub. Servs., 237 F.3d 1101, 1107 (9th Cir. 2001),
11 and Wallis v. Spencer, 202 f.3d 1126, 1136 (9th Cir. 2000), as confirmed in Rogers v. County of San
12 Joaquin, 487 F. 3d 1288 (9th Cir. 2007), and was a violation of Plaintiffs' constitutional rights under the
13 Fourth and Fourteenth Amendments of the U.S. Constitution, and Article 1, Section 1 of the California
14 State Constitution (including as to the right of privacy).

15 22. Defendants ROBERTS, BENSON, MARKS and CURTIS, and others, who were employed
16 by COUNTY, SIERRA COUNTY DEPARTMENT OF HEALTH AND HUMAN SERVICES failed to
17 fulfill their mandatory duties. Defendants, among other things, failed to (1) establish, implement, and
18 follow polices, procedures, customs and practices mandated by the U.S. Constitution and California
19 Constitution, and laws, as to the removal, questioning, detention, continued detention and examination,
20 and conducting of dependency investigations and proceedings of minor children in alleged child abuse
21 or neglect matters; (2) properly supervise, manage, control, and direct the activities of its officers, agents
22 and employees as to their compliance with those principals mandated by the First, Fourth and Fourteenth
23 Amendments to the United States Constitution and laws, and under the California Constitution and laws,
24 including those as to the right of privacy, and as to child abuse and neglect proceedings; (3) implement
25 and establish a policy of truthful, unbiased and full and complete reporting, including evidence and
26 testimony both positive and negative (exculpatory), in the investigation or proceedings of matters
27 pursuant to Chapter 2 (commencing with section 200) of Part 1 of Division 2 of the California Welfare
28

1 and Institutions Code; and (4) signing and filing of dependency petitions under penalty of perjury without
2 having personal knowledge of the facts and circumstances supporting such petition.

3 23. Defendants were serving as an arm of the state and of the juvenile court. *In re Malinda S.*
4 (1990) 51 Cal. 3d 368, 376-377, 272 Cal. Rptr. 787, 795 P.2d, 1244. Furthermore, Defendants
5 ROBERTS, BENSON and MARKS were a party to the dependency proceeding. Nevertheless, defendants
6 ROBERTS, BENSON, and MARKS breached their duty to the state and the juvenile court by making
7 false allegations against the Plaintiff JILL and others, all to the detriment of Plaintiffs J.P. and M.P. It
8 is the public policy of the State of California that child protection agencies and employees assume an
9 obligation of the highest order to ensure the safety of children in their care. [Cal. W&I section
10 16000.1(a)(1)].

11 GENERAL DESCRIPTION OF THE LEGAL BASIS FOR COUNTY LIABILITY

12 (1) Damages failure to adequately train or supervise employee resulting in deliberate unconcern
13 and deprivation to constitutional rights and reckless disregard for the plaintiffs' Fourteenth and Ninth
14 Amendment Rights under the Constitution of the United States of America; (2) Damages for deprivation
15 of rights and conspiracy against rights under color of law, damages against the Fourteenth Amendment
16 Rights under the Constitution of the United States of America and the enumerated right under the Ninth
17 Amendment of the United States of America; (3) Damages for fraudulent documents and evidence used
18 against Plaintiffs in order to deprive Plaintiffs of rights; (4) Damages for malicious prosecution; (5)
19 Damages for improper investigation; (6) Damages for the violation of Plaintiff's educational rights; (7)
20 Damages for the withholding exculpatory evidence; (8) Damages for loss of reputation and
21 embarrassment through slander; (9) Damages for intentional infliction of emotional distress; (10)
22 Damages for negligent infliction of emotional distress; (11) Damages for the pain and suffering and
23 mental anguish; (12) damages for the loss of salary/work and potential due to fraud by defendants; (13)
24 Punitive damages; and (14) Consequential damages

25

26 THE AMOUNT OF THE CLAIM AS OF THE DATE OF PRESENTATION OF THE CLAIM,
27 INCLUDING THE ESTIMATED AMOUNT OF ANY INJURY, DAMAGE, OR LOSS, INsofar AS
28 IT MAY BE KNOWN AT THE TIME OF THE PRESENTATION OF THE CLAIM, TOGETHER

1 WITH THE BASIS OF COMPUTATION OF THE AMOUNT CLAIMED:

2 Estimated Damages (Compensatory/Special) Exceed: \$5,000,000.00
3 Punitive Damages: \$25,000,000.00
4

5 JURISDICTION OF THE CLAIM

6 United States District Court for the Eastern District of California, Sacramento Division.

7 This claim arises from the violation of the right to family integrity and protections guaranteed by
8 the United States Constitution in procedural and substantive due process pursuant to 42 U.S.C. § 1983.
9 This claim arises under 42 U.S.C. § 1983; the Fourth and Fourteenth Amendments to the United States
10 Constitution. Plaintiffs will invoke rights under the Declaratory Judgment Act, 28 U.S.C., Sections 2201
11 and 2202. Plaintiffs will invoke the United States District Court for the Eastern District of California,
12 Sacramento Division, pendent jurisdiction over the related State claims. The venue of this claim is
13 properly placed in the District of California pursuant to 28 U.S.C. § 1391 because Plaintiffs' claims arise
14 in this district.

15 The Director of the Department of Social Services is the person who is responsible for carrying
16 out the mandates that are required for accepting the funding from the United States for child protection.
17 The Director is also the person who allocates the funding pursuant to these mandates to the local agencies,
18 one being Sierra County, California, for child protective services. The events leading to the violations
19 recited herein took place within the political boundaries of the State of California, County of Sierra.

20 ALL NOTICES TO THE PERSON PRESENTING THE CLAIM SHOULD BE SENT TO:

21 Carroll E. Peiffer
22 Attorney at Law
23 The Historic McCoy House, 216 5th Street
24 Marysville, CA 95901
(530)749-9538

25 Dated: January 7, 2011



26 CARROLL E. PEIFFER
27 Attorney for Claimant
28 JILL MARIE MOLARIS

Exhibit A

(TO NOTICE OF CLAIM AGAINST PUBLIC ENTITY)

ORIGINAL

**Claim Against the
County of Sierra
State of California
(Government Code Section 910, et Seq.)**

FILED

TO: Sierra County Department of Social Services

DEC 22 2010

A. Name and Post Office Address of the Claimant:

Jean Newfarmer-Fletcher
c/o Sandra Stanley, Attorney at Law
2059 Nevada City Highway, Suite 106
Grass Valley, CA 95945

HEATHER FOSTER, COUNTY CLERK
By: *[Signature]*

B. Post Office Address to Which the Person Presenting the Claim Desires Notices to Be Sent:

Law Offices of Sandra Stanley
2059 Nevada City Highway, Suite 106
Grass Valley, CA 95945

C. The Date, Place, and Circumstances of the Occurrence or Transaction Which Gave Rise to the Claim Asserted:

During the past several years of Claimant's employment as a Social Worker 3, employed by Sierra County Social Services (hereinafter "the Agency"), Claimant has been harassed, intimidated, humiliated, and deprived of her Civil Rights by the Agency, including without limitation being removed from her office in front of other personnel, falsely accused, without probable cause, of drinking on the job, and forcibly subjected to a knowingly unnecessary drug and alcohol test, the results of which proved to be negative. The causes of this incident and the incidents subsequently described herein are primarily due to the negligent hiring practices and disregard of civil rights protections of employees by Sierra County, among other things.

Commencing on or about May 17, 2010, to and including the present, Claimant was assigned to a Child Protective Services case although her expertise was in Adult Protective Services. Another County social worker, Jodi Benson (hereinafter "Benson"), had been removed from the case for good cause and Claimant was prevailed upon by County employee and Claimant's supervisor, James Marks (hereinafter "Marks"), to take the case.

Thereafter, on or about July 28, 2010, Claimant determined that Benson's management of the case was faulty and incompetent, and that Benson had allegedly broken confidentiality and fabricated allegations against the family involved in said CPS case.

Claimant subsequently learned, on or about August 5, 2010, that the Court had checked a box on a prior Findings and Order After Hearing dismissing the case. Claimant informed Marks of the dismissal and Marks impliedly accused Claimant of forging the form although it came from the Court's official files. Marks further accused Claimant of breaching confidentiality in the CPS case, and obtained orders from Carol Roberts, Social Services' Director, impliedly ordering Marks to always be in the office where Claimant was, presumably in order to constantly supervise her. This supervision order was never put into effect. Claimant has been employed by the Agency for many years and consistently receives outstanding reviews from Northern Regional, the State Agency overseeing County Social Services offices, while Benson and Marks have only been recently employed by Sierra County.

On or about August 20, 2010, Marks requested Claimant to prepare a progress report on the CPS case, which Claimant wrote up in her standard fashion, i.e. straight and to the point, but which upset Marks for unclear reasons. Marks then rewrote Claimant's report and submitted it to James Curtis, County Counsel. Claimant was extremely upset by Marks' actions because claimant did not feel the rewritten report was honest or accurate and on or about August 23, 2010, she informed Curtis of the chain of events. Curtis assured Claimant that the case would not be "railroaded," as Marks desired.

Thereafter, on or about September 22, 2010, Marks prepared a CPS Court report on the case. Because it contained numerous untruths and harsh, unjustified recommendations, Claimant would not sign off on it, whereupon Marks abruptly and viciously removed her from the case, causing Claimant to suffer an extreme attack of violent shaking, with chest and arm pain. She was life-flighted to Reno Renown Hospital and was on stress leave from September 23 to October 17, 2010.

Claimant as well as other Health & Human Service Department employees had been subpoena'd by the defense attorney for said CPS case for the October 27, 2010 Court hearing. Carol Roberts, Social Services Director, falsely informed County Counsel Curtis that the Office Assistant was unable to attend. Claimant believes and thereon alleges that Roberts' purpose in making such false representations to Curtis was to exclude any evidence in favor of the defense.

Claimant is informed and believes and thereon alleges that Jodi Benson and James Marks have an inappropriate personal relationship outside of the office setting creating additional hostility in an already hostile work environment. Slanderous accusations have been fabricated against claimant as well as other staff members interfering with the ability of claimant and other staff members to perform their duties effectively. A climate of fear and distrust has been created which affects the ability of staff members to properly meet their obligations to the clients of the Agency.

Management, including other County agencies, are aware of the untenable situation created by Roberts, Benson, and Marks, yet have chosen to ignore their actions (perhaps in self-defense), despite the physical, emotional, and legal assaults on Claimant and the other staff members.

D. GENERAL DESCRIPTION OF THE INDEBTEDNESS, OBLIGATION, INJURY, DAMAGE, OR LOSS INCURRED SO FAR AS IT MAY BE KNOWN AT THE TIME OF PRESENTATION OF THE CLAIM:

Claimant has suffered severe physical, emotional, economic, and career damages as a result of the County's negligent hiring practices, and its failure to cure known violations of Claimant's personal, employment, and Civil Rights, in a sum within the jurisdiction of the Court.

E. GENERAL DESCRIPTION OF THE LEGAL BASIS FOR COUNTY LIABILITY, AND THE DATE OF DISCOVERY THEREOF:

Libel, Slander, Intentional and Negligent Infliction of Emotional Distress, Intentional and Negligent Misrepresentation of Facts, Fraud by Concealment, and other bases of liability to be determined subsequent to discovery in this action.

F. THE NAME OR NAMES OF THE PUBLIC EMPLOYEE OR EMPLOYEES CAUSING THE INJURY, DAMAGE, OR LOSS, IF KNOWN:

•Carol Roberts

•Jodi Benson

• James Marks

G. THE AMOUNT CLAIMED AS OF THE DATE OF PRESENTATION OF THE CLAIM, INCLUDING THE ESTIMATED AMOUNT OF ANY PROSPECTIVE INJURY, DAMAGE, OR LOSS, INsofar AS IT MAY BE KNOWN AT THE TIME OF THE PRESENTATION OF THE CLAIM, TOGETHER WITH THE BASIS OF COMPUTATION OF THE AMOUNT CLAIMED:

Damages exceed \$10,000 Yes XX No

Punitive/exemplary damages Yes XX No

Jurisdiction of the Claim: XX Superior Court

 Limited Civil Action

XX U.S. District Court

 Other

Dated: December 19, 2010

LAW OFFICES OF SANDRA STANLEY

By 

Sandra Stanley, Attorney for Claimant,
JEAN NEWFARMER FLETCHER

PROOF OF SERVICE (CCP §§ 1013(a); 2015)

I, PRISCILLA MILLER, am over eighteen years of age. My primary place of business is in the County of Yuba, California. I am not a party to the above-referenced action. On the date indicated below, I served the following document(s): NOTICE OF CLAIM AGAINST PUBLIC AGENCY

xxx by mail on the following party(ies) in said action, in accordance with Code of Civil Procedure § 1013(a), by placing a true copy thereof enclosed in a sealed envelope in a designated area for outgoing mail, addressed as set forth below, and given the correct amount of postage and mailed the same day in the ordinary course of business at the **LAW OFFICES OF CARROLL EDWARD PEIFFER**, The McCoy House 216 5th Street, Marysville, CA 95901. 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 day of deposit for mailing in affidavit.

by personally delivering a true copy thereof, in accordance with the Code of Civil Procedure § 1101, to the person(s) and at the address(es) set forth below.

SEE ATTACHED SERVICE LIST

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct and that this document was executed on January 7, 2011.


PRISCILLA MILLER

James Curtis
Sierra County Counsel
131 South Auburn Street, Suite 200
Grass Valley, CA 95945

Carol Roberts
Social Services Director
Sierra County Human Services/Social Services Department
202 Front Street
Loyalton, CA 96118

James Marks
Sierra County Human Services/Social Services Department
202 Front Street
Loyalton, CA 96118

Jodi Benson
Sierra County Human Services/Social Services Department
202 Front Street
Loyalton, CA 96118

Dave Goicoechea, Chair
Heather Foster, Clerk of the Board
P. O. Drawer D
100 Courthouse Square, Suite 11
Downieville, CA 95936
