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9 Attorneys for Petitioner CALIFORNIA CIVIL RIGHTS DEPARTMENT
(Fee Exempt per Gov. Code, § 6103)

10 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **IN AND FOR THE COUNTY OF ALAMEDA**

12
13 CALIFORNIA CIVIL RIGHTS
DEPARTMENT, an agency of the State of
14 California,
15
Petitioner,
16
vs.
17 TESLA, INC. doing business in California as
TESLA MOTORS, INC.,
18 Respondent.
19
20

Case No.:
**CALIFORNIA CIVIL RIGHTS
DEPARTMENT'S PETITION TO
COMPEL COMPLIANCE WITH
INVESTIGATIVE DISCOVERY AND
APPLICATION FOR AN ORDER TO
SHOW CAUSE**
(Gov. Code, § 12963.5)
Judge:
Dept:

1 Petitioner CALIFORNIA CIVIL RIGHTS DEPARTMENT (hereafter “CRD”) alleges as
2 follows:

3 **I. INTRODUCTION**

4 1. This is an action to enforce compliance with an investigative subpoena for appearance
5 issued by CRD to respondent Tesla, Inc. (hereafter “Tesla”), on March 3, 2023. CRD issued the
6 investigative subpoena for appearance of respondent Tesla’s Person Most Knowledgeable (“PMK”) and
7 request for production of documents (“PMK notice”) in connection with its ongoing, confidential
8 investigation into allegations of unlawful harassment and discrimination tolerated and fostered by
9 respondent Tesla against the Complainants encompassed in the SD Group/Class administrative
10 complaint.¹ The Complainants have all alleged instances of discrimination and harassment against
11 respondents Tesla for matters including, but not limited to, sex, race, and disability discrimination.

12 2. Prior to issuing the investigative PMK notice, CRD met and conferred with respondent
13 Tesla in early February to assess respondent Tesla’s availability. CRD requested dates when the PMK
14 witness would be available in the meet and confer process, but no dates were ultimately provided to
15 CRD. In response, on March 3, 2023, CRD issued the investigative PMK notice as authorized by
16 Government Code section 12963.1. In issuing this investigative PMK notice, CRD is executing its
17 obligations to investigate administrative complaints before it. (See Gov. Code, § 12930.) Respondent
18 Tesla did not respond to CRD’s March 3, 2023 email, which provided electronic courtesy copies of the
19 investigative PMK notice, until nearly a month later.

20 3. On March 29, 2023, CRD provided the zoom link for the investigative PMK deposition.²
21 Shortly after CRD’s March 29 email, respondent Tesla responded with objections to CRD’s
22 investigative PMK deposition, and raised for the first time objections that CRD abused its investigative
23 subpoena power. CRD continued its meet and confer efforts, and learned that respondent Tesla claims
24 there was not enough time for them to locate witnesses CRD has subpoenaed *separately and after* it sent
25

26 ¹ CRD will refer to the Complainant whose own individual administrative complaint served as the basis for the administrative
27 group/class complaint as “SD” to preserve the Complainant’s privacy. Respondent Tesla has been provided notice of the
28 Complainant’s identity when CRD served the Notice of Filing of SD’s administrative complaint.

² CRD has met and conferred regarding other investigative subpoenas arising under the SD Group/Class
administrative complaint. However, in the interest of judicial economy, CRD brings this limited petition to encourage
informal resolution of additional administrative investigative subpoenas.

1 its PMK notice. As a compromise, CRD offered a tolling agreement to address respondent Tesla’s stated
2 concern. Respondent Tesla refused to enter into the tolling agreement as a compromise. This petition
3 follows. CRD seeks an order to show cause as to why respondent Tesla has not “respond[ed] fully” to
4 the investigative discovery. (See Gov. Code, § 12963.5, subd. (a).)

5 4. The Petition requests that the Court grant an Order to Show Cause, and, after the hearing
6 upon that Order, compel Tesla to comply with CRD’s investigative discovery requests. The Petition also
7 requests reasonable attorneys’ fees in the amount of \$1,425, as authorized under Government Code
8 section 12963.5(e)(1). (Declaration of Juan Gamboa in Support of Petition to Compel [“Gamboa
9 Decl.”], ¶23.)

10 **II. THE PARTIES**

11 5. The CRD is the state agency authorized to enforce state civil rights laws, including the
12 Fair Employment and Housing Act (FEHA). (See Gov. Code, § 12930; see also *Dept. of Fair*
13 *Employment and Housing v. Super. Ct. of Kern County* (2020) 54 Cal.App.5th 356, 371 [“The FEHA’s
14 remedial scheme is carried out in part by the . . . [Department], which is vested with authority to enforce
15 state civil rights laws as ‘an exercise of the police power of the state for the protection of the welfare,
16 health, and peace of the people of this state.’”].) In conducting its investigations, CRD is vested with
17 investigative discovery rights, including subpoena power. (Gov. Code, § 12963.1.) If a person or entity
18 does not comply with or fully respond to CRD’s investigative discovery requests, it is authorized to
19 petition a superior court to compel the full responses. (Gov. Code, § 12963.5. [setting forth the express
20 procedure by which CRD can bring a petition].)

21 6. Tesla is a Texas corporation with its principal place of business at 1 Tesla Rd, Austin,
22 Texas 78725. At all relevant times hereto, Tesla has conducted business within the State of California.
23 (Gamboa Decl., ¶2.)

24 **III. JURISDICTION AND VENUE**

25 7. Jurisdiction and venue are proper in the Superior Court of the State of California, in the
26 County of Alameda, under Government Code section 12963.5. When an individual or organization fails
27 to comply with a CRD investigative discovery request, CRD may file with a superior court a petition for
28 an order compelling compliance, naming as respondent the individual or organization that failed to

1 comply. (Gov. Code, § 12963.5, subd. (a).) Such action may be brought in any county in which CRD's
2 investigation or inquiry takes place. (*Id.*; 2 CCR § 10026.) CRD's investigation takes place in Alameda
3 County, in addition to other locations in California.

4 **IV. STATEMENT OF FACTS**

5 8. Complainant SD filed their administrative matter on April 16, 2021 against respondent
6 Tesla. (Gamboa Decl., ¶ 2.) On April 28, 2021, CRD served the Notice of Filing of the Discrimination
7 Complaint on respondents Tesla (*Id.* at ¶3.) On April 15, 2022, CRD served respondent Tesla with a
8 notice of Group or Class Investigation arising out of SD's administrative complaint, which tolls the
9 period to investigate SD's administrative complaint as well as the other administrative complaints under
10 the SD administrative complaint. (*Id.* at ¶4.) On September 29, 2022, CRD served its Amended Notice
11 of Group or Class Investigation related to SD. (*Id.* at ¶5.)

12 9. On February 14, 2023, CRD requested dates when respondent Tesla's PMK would be
13 available for deposition related to SD's administrative complaint. (*Id.* at ¶6.) CRD specified that the
14 PMK investigative deposition would cover respondent Tesla's policies and procedures regarding the
15 reporting, handling, and investigations into discrimination and harassment complaints made by
16 production associate and manufacturing workers at Tesla facilities in California. (*Ibid.*) CRD provided
17 its availability for this investigative deposition and requested a response from respondent Tesla with
18 dates when respondent Tesla's PMK would be available for their investigative deposition by February
19 21, 2023. (*Ibid.*) CRD indicated that if respondent Tesla did not provide available dates, CRD would
20 notice the investigation deposition as permitted by the government code. (*Ibid.*)

21 10. On February 16, 2023, respondent Tesla responded that they would review available
22 dates regarding availability. (*Id.* at ¶7.) Respondent Tesla also requested a draft of the PMK deposition
23 notice to identify the appropriate individual to be deposed. (*Ibid.*) On February 17, 2023, CRD
24 responded to respondent Tesla and re-iterated that CRD was seeking to depose respondent Tesla's PMK
25 regarding respondent Tesla's policies and procedures regarding the reporting, handling, and
26 investigations into discrimination and harassment complaints made by production associate and
27 manufacturing workers at Tesla facilities in California. (*Id.* at ¶8.) On February 20, 2023, respondent
28 Tesla responded by requesting additional information to identify the correct individual to be deposed.

1 (*Id.* at ¶9.) At no point during the Parties' February meet and confers did respondent Tesla represent a
2 refusal to produce their PMK on the identified topics based on an alleged abuse of subpoena power, or
3 for any other reason. (*Ibid.*) In fact, respondent Tesla indicated that it was going to identify an individual
4 after learning the substance of the investigative PMK deposition and provide available dates. (*Ibid.*)

5 11. On February 21, 2023, respondent Tesla failed to communicate with CRD with respect to
6 the investigative depositions or provide any dates when respondent's PMK would be available for
7 deposition, as requested in CRD's February 14 correspondence. (*Id.* at ¶10.) On March 3, 2023, CRD
8 served by certified mail, return receipt requested, an investigative deposition notice for respondent
9 Tesla's PMK on respondent Tesla. (*Id.* at ¶11.) The deposition was set to occur on April 3, 2023. (*Ibid.*)
10 On March 3, 2023, CRD provided an electronic courtesy copy of the investigative deposition notice for
11 respondent Tesla's PMK to respondent Tesla by email. (*Id.* at ¶12.) CRD wrote to respondent Tesla that
12 CRD had yet to hear from them regarding availability, and so CRD noticed the investigative depositions
13 by Code. (*Ibid.*) CRD informed respondent Tesla that Zoom login information would follow. (*Ibid.*)

14 12. On March 29, 2023, at 3:40 pm, CRD emailed respondent Tesla summarizing prior meet
15 and confer efforts and to provide zoom links for the depositions scheduled for April 3. (*Id.* at ¶13.)
16 Specifically, CRD highlighted that it had not received any response from respondent Tesla after CRD
17 provided electronic courtesy copies of the investigative depositions nearly a month earlier on March 3,
18 2023. (*Ibid.*) In this same email, CRD requested that respondent Tesla confirm the PMK's appearance
19 on April 3. (*Ibid.*)

20 13. On March 29, 2023, at 3:59 pm, respondent Tesla provided objections to CRD's
21 investigative deposition notice requiring appearance of respondent Tesla's PMK. (*Id.* at ¶14.)
22 Respondent Tesla refused to produce the investigative PMK witness, alleging for the first time that CRD
23 is abusing the subpoena power and improperly attempting to cure its failure to conduct a pre-suit
24 investigation in another matter. (*Ibid.*) Respondent Tesla did not raise these concerns with CRD during
25 the meet and confer process, and previously represented that they would confer regarding available dates
26 for the investigative depositions of their PMK. (*Ibid.*) On March 30, 2023, respondent Tesla unilaterally
27 declared to CRD that the investigative deposition of their PMK would not be going forward. (*Id.* at ¶15.)

28 14. On April 3, 2023, CRD emailed respondent Tesla to request a further meet and confer

1 conference regarding respondent Tesla's refusal to produce their PMK for an investigative deposition.
2 (*Id.* at ¶16.) On this same day, respondent Tesla responded with their availability for a meet and confer
3 call. (*Id.* at ¶17.) The Parties agreed to meet on April 6 at 9 am. (*Id.* at ¶18.)

4 15. On April 5, 2023, CRD sent an email to respondent Tesla to provide additional context
5 regarding the Parties' meet and confer efforts up to then, and to propose a compromise. (*Id.* at ¶19.)
6 Specifically, CRD proposed to reschedule the previously noticed investigative PMK deposition on the
7 condition that respondent Tesla agree to a tolling agreement to allow the parties to arrange the
8 investigative deposition, as the parties had been meeting and conferring on other investigative
9 depositions.³ (*Ibid.*) CRD requested a response from respondent Tesla to the proposal by the close of
10 business on April 7, 2023. (*Ibid.*)

11 16. On April 7, 2023, the Parties further met and conferred further in an attempt to re-
12 schedule the investigative depositions. (*Id.* at ¶20.) During this meeting, CRD requested legal authority
13 for respondent Tesla's position that seeking to depose their PMK was an abuse of the subpoena power.
14 (*Ibid.*) Respondent Tesla did not identify any statute or case law to support their position, and instead
15 argued that CRD's later noticed investigative depositions were an abuse of subpoena power. (*Ibid.*)
16 Respondent Tesla further argued that it needed more time to identify individuals whose investigative
17 depositions were later noticed, as some of their names are not currently known by respondent Tesla or
18 CRD. (*Ibid.*) CRD asked respondent Tesla whether they believed the investigative PMK noticed on
19 March 3, 2023 was an abuse of subpoena power, because of the 44 investigative deposition notices
20 served weeks later. (*Ibid.*) Despite the clear temporal disconnect between the investigative PMK notice
21 and later noticed investigative depositions, respondent Tesla confirmed that it rested its refusal to
22 produce an investigative PMK witness on the later and separately subpoenaed individual investigative
23 depositions. (*Ibid.*) In an effort to reach a compromise, CRD re-iterated its April 5 proposal to re-
24 schedule respondent Tesla's PMK in exchange for a tolling agreement that would address respondent
25

26 ³ On February 14, 2023, CRD sought to meet and confer regarding scheduling an investigative PMK deposition, and the
27 investigative deposition of Jeff Kongpachit, an alleged harasser. The investigative PMK deposition relates to SD's
28 Group/Class administrative complaint, and the investigative deposition of Mr. Kongpachit relates to an individual
administrative complaint encompassed in the SD Group/Class administrative complaint. As a matter of efficiency, CRD met
and conferred with counsel for respondent Tesla on these matters in the same correspondence. CRD may seek a petition to
compel Mr. Kongpachit's investigative deposition in a later filing.

1 Tesla’s concern regarding time to produce the later-noticed witnesses. (*Id.*) Respondent Tesla requested
2 until April 10, 2023 to decide to enter into a tolling agreement or provide a response, and CRD indicated
3 it would respond shortly on the request. (*Ibid.*)

4 17. On April 7, 2023, CRD emailed respondent Tesla a summary of the Parties’ meet and
5 confer call, and indicated CRD agreed to provide until April 10, 2023 for respondent Tesla to enter into
6 a tolling agreement. (*Id.* at ¶21.) In this same email, CRD produced the tolling agreement, and indicated
7 to respondent Tesla that should they agree, they can return the tolling agreement with their signature by
8 no later than 5:00 pm on April 10, 2023. (*Id.*)

9 18. Respondent Tesla failed to extend the courtesy of responding by April 10, as they had
10 indicated they would. (*Id.* at ¶22.) On April 11, 2023, CRD sent an email confirming that the Parties
11 were at an impasse because of respondent Tesla’s failure to communicate, and promptly filed the instant
12 petition. (*Id.*)

13 V. LEGAL ARGUMENT

14 A. CRD HAS BROAD INVESTIGATORY AUTHORITY

15 19. The California legislature provided CRD with broad authority to investigate and
16 prosecute violations of the FEHA, Government Code section 12900 et seq. Under the FEHA, CRD may
17 “receive, investigate, conciliate, mediate, and prosecute complaints alleging practices made unlawful.”
18 (Gov. Code, § 12930, subd. (f)(1).) Courts have recognized that CRD’s investigation of discrimination
19 complaints is “similar to grand jury proceedings, and can therefore be initiated merely on suspicion that
20 the law is being violated, or even just because [the Department] wants assurance that [the law] is not
21 [being violated].” (*Dept. Fair Empl. & Hous. v. Super. Ct.* (2002) 99 Cal.App.4th 896, 901 [internal
22 citation omitted].) Thus, courts have repeatedly recognized that “the [CRD’s] investigatory . . .
23 procedure is to be “construed liberally for the accomplishment of the purposes of [FEHA]” and given
24 great deference. (*Dept. Fair Empl. & Hous. v. Law School Admissions Council, Inc.* (2012) 896
25 F.Supp.2d 849, 862, quoting Gov. Code, § 12993, subd. (a).)

26 20. In its investigation, CRD may “issue and serve . . . subpoenas . . . to require the
27 production of books, records, documents, and physical materials in the possession or under the control
28 of an . . . organization named on the subpoena.” (Gov. Code, §12963.1, subd, (a).) Upon failure to

1 “comply with a subpoena, interrogatory, request for production, or examination under oath by refusing
2 to respond fully or objecting thereto, or by obstructing any proceeding before the [CRD,]” CRD may
3 petition for an order compelling compliance. (Gov. Code, §12963.5, subd. (a).) CRD’s petition to
4 compel is not a “complaint” on the merits, but rather instead a tool to assist CRD in fulfilling the
5 purpose of FEHA. (*Dept. of Fair Emp. & Hous. v. Superior Ct. of Kern Cnty.* (2020) 54 Cal.App.5th
6 356, 385 [finding that a similar CRD administrative investigative tool is not a complaint on the merits].)

7 **B. GOOD CAUSE JUSTIFIES AN ORDER TO COMPEL RESPONDENT TESLA’S**
8 **COMPLIANCE WITH INVESTIGATIVE DISCOVERY**

9 21. Government Code section 12963.5 provides the standard for reviewing CRD’s
10 application: “[I]f the petition sets forth good cause for relief, the court shall issue an order to show cause
11 to the respondent; otherwise, the court shall enter an order denying the petition.” (Gov. Code, § 12963.5,
12 subd. (b).) A court should grant CRD’s petition to compel if (1) the subpoena was issued or carried out
13 in accordance with FEHA; (2) the information sought was identified with sufficient particularity to
14 allow a response and the information it seeks is reasonably relevant to the inquiry or investigation before
15 it; and (3) the party from whom discovery is sought has failed to comply. (*Dept. Fair Empl. & Hous. v.*
16 *Super. Ct., supra*, 99 Cal.App.4th at p. 901 [citing Gov. Code, § 12963.5, subd. (a)].)

17 22. As described below, the CRD meets all the requirements to obtain an order compelling
18 compliance with the investigative discovery.

19 i. CRD Requested Information in Accordance with the FEHA

20 23. CRD acted consistently with its statutory authority under the FEHA by serving
21 respondent Tesla with an investigative subpoena for appearance of its PMK regarding respondent
22 Tesla’s policies and procedures regarding the reporting, handling, and investigations into discrimination
23 and harassment complaints made by production associate and manufacturing workers at Tesla facilities
24 in California. (See Gov. Code, §§ 12930, subd. (g)(4), 12963.1 [empowering CRD to serve subpoenas
25 during an administrative investigation].) In accordance with the law enforcement powers granted under
26 the FEHA, CRD properly served Respondent Tesla with an investigative subpoena on March 3, 2023,
27 together with a proof of service. (Gamboa Decl. ¶11, Exhibit 9; Gov. Code, § 12963.1.)

28 ///

1 ii. CRD Requested Specific and Relevant Information Necessary To Investigate and
2 Assess the Allegations Against Respondent Tesla

3 24. CRD’s discovery requests are to be made with “sufficient particularity and be reasonably
4 relevant” to its investigation. (Gov. Code, § 12963.5, subd. (b).) CRD may seek information it deems
5 necessary to “decide whether to charge a statutory violation, or to make the decision that no further
6 action is necessary.” (*Dept. Fair Empl. & Hous. v. Super. Ct.*, *supra*, 99 Cal.App.4th at p. 902.)

7 25. Here, CRD’s investigative subpoena for appearance meets this criteria. First, CRD
8 noticed respondent Tesla’s PMK regarding the policies and procedures for reporting and handling
9 investigation into allegations of discrimination and harassment. Further, CRD’s PMK notice clearly
10 defines the PMK topics sufficient for respondent Tesla to identify who is the most appropriate witness to
11 produce. CRD’s routine investigative PMK notice was articulated with sufficient particularity to allow
12 Respondent Tesla to designate a witness and provide documents in response to the PMK notice.
13 Additionally, the document requests in CRD’s PMK notice were sufficiently detailed and specific in
14 listing, among other things, the kinds of internal complaint processing information CRD sought related
15 to the Complainants covered under the SD Group/Class administrative complaint. (Gamboa Decl. ¶11,
16 Exhibit 9.)

17 26. In CRD’s initial February meet and confer correspondence regarding the PMK notice,
18 respondent Tesla did not express any confusion with the PMK topics that CRD shared, and represented
19 that it was considering dates that its witness would be available. It was not until March 29, 2023, after
20 nearly a month of non-responsiveness, did respondent Tesla provide formal objections to the PMK
21 deposition subpoena.⁴ (Gamboa Decl., ¶14, Exhibit 12.) Respondent Tesla alleged for the first time that
22 CRD had abused its subpoena power by noticing the PMK deposition, according to respondent Tesla, in
23 an attempt to unlawfully cure its pre-filing investigation requirement before bringing suit in the matter

24 _____
25 ⁴ Respondent Tesla’s investigative PMK objections allege that CRD’s PMK topics are overbroad and not “necessary” to
26 determine whether an unlawful practice has occurred. Addressing the Equal Employment Opportunity Commission (EEOC)
27 similar investigative and enforcement mandate, courts have held that the EEOC does not have to show a “particularized
28 necessity of access, beyond a showing of mere relevance,” to obtain evidence. (*U.S. Equal Emp. Opportunity Comm’n v. McLane Co., Inc.* (9th Cir. 2017) 857 F.3d 813, 816 [citing *University of Pennsylvania v. EEOC* (1990) 493 U.S. 182, 188].) More importantly, “Congress has not left it to employers accused of discrimination to decide what evidence may be necessary for the EEOC to complete its investigation.” (*University of Pennsylvania v. EEOC* (1990) 493 U.S. 182, 193.) The same is true for CRD under FEHA, which substantially reflects the framework Congress established for EEOC enforcement in Title VII.

1 of *Department of Fair Employment and Housing v. Tesla, Inc.* Case No. 22CV006830 (“Civil Matter”).
2 Respondent Tesla identified no basis in law for its refusal to appear for deposition in the meet and confer
3 process when asked. (Gamboa Decl. ¶20.)

4 27. Respondent Tesla ignores that CRD has a statutory obligation to investigate matters
5 currently before it. (Gov. Code, §12963.) The administrative complaints encompassed by the SD
6 Group/Class Complaint contain allegations of disability, race and sex discrimination In executing its
7 statutory obligation, CRD sought an investigative deposition of respondent Tesla’s PMK on reporting
8 and handling of discrimination and harassment complaints, including related to disability, race and sex,
9 as it directly relates to the allegations of the underlying administrative complaints.

10 iii. Respondent Tesla Failed to Provide Compliant Responses to CRD’s Investigative
11 Discovery

12 28. The final requirement for an order compelling compliance with CRD’s investigatory
13 discovery is to show that respondent failed to comply. (*Dept. Fair Empl. & Hous. v. Super. Ct., supra*,
14 99 Cal.App.4th at p. 901.) Despite CRD’s meet and confer efforts, respondent Tesla continues to refuse
15 to produce an investigative PMK witness and provide responsive documents. Respondent Tesla has
16 rebuffed CRD’s repeated efforts to obtain compliance with uncontroversial investigative discovery
17 requests that are important tools for a government agency to investigate allegations of workplace
18 discrimination. (Gov. Code, §12920 [“It is hereby declared as the public policy of this state that it is
19 necessary to protect and safeguard the right and opportunity of all persons to seek, obtain, and hold
20 employment without discrimination or abridgment on account of sex It is the purpose of this part to
21 provide effective remedies that will eliminate these discriminatory practices. This part shall be deemed
22 an exercise of the police power of the state for the protection of the welfare, health, and peace of the
23 people of this state.”] [emphasis added].) As such, CRD has satisfied this criteria.

24 **C. An Award of Attorneys’ Fees is Justified Against Respondent Tesla**

25 29. Government Code section 12963.5(e)(1) authorizes this Court to award attorneys’ fees to
26 CRD if it prevails on a petition to compel discovery. An award of attorneys’ fees is justified in this
27 matter to discourage respondent Tesla’s disregard of the administrative mandate and authority of CRD, a
28 government enforcement agency. Respondent Tesla refuses to produce an investigative PMK witness

1 and failed to provide documents requested the investigative PMK subpoena, despite CRD's continued
2 efforts to obtain voluntary compliance from respondent Tesla. Respondent Tesla's actions, including its
3 failure to timely respond and its belated assertion of unsupported objections, reveal that it will not
4 comply with CRD's investigative discovery absent coercive measures by the Court. To prevent further
5 frustration of the purpose of FEHA, CRD respectfully requests that this Court award CRD attorneys'
6 fees in the amount of \$1,425.

7 **PRAYER FOR RELIEF**

8 30. Based upon the foregoing and pursuant to Government Code section 12963.5 CRD prays
9 that this Court:

- 10 a. Issue an order directing respondent Tesla to appear before this Court and to show cause
11 as to why it has refused to comply and/or not fully complied with CRD's investigative
12 discovery;
- 13 b. Upon respondent Tesla's failure to show cause, enter an order directing respondent Tesla
14 to produce a PMK witness for deposition and to provide full, complete responses to
15 CRD's Subpoena Duces Tecum, Requests 1 through 14; and
- 16 c. An award of attorneys' fees in the amount of \$1,425.
- 17 d. Grant any such other relief this Court deems fair and just.
- 18

19 Date: April 12, 2023

CALIFORNIA CIVIL RIGHTS DEPARTMENT

20 *Juan Gamboa*

21 _____
Juan Gamboa
22 Attorney for Petitioner