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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

CALIFORNIA FACULTY ASSOCIATION,
MARGARITA BERTA-ÁVILA, LOREN
CANNON, CHRISTOPHER COX, MOLLY
TALCOTT, and ERICKA VERBA,

Petitioners/Plaintiffs,

v.

BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY,

Respondent/Defendant.

Case No. **25STCP03935**

**VERIFIED PETITION FOR WRIT OF
MANDATE; COMPLAINT FOR
INJUNCTIVE AND DECLARATORY
RELIEF**

**Cal. Const. art. I, § 1; Civ. Code 1798 et
seq.; Code of Civ. Proc. §§ 526, 1060, 1085**

INTRODUCTION

1. The California Faculty Association and five of its members (collectively, “Petitioners”) bring this action under Article I, section 1 of the California Constitution and the Information Practices Act of 1977, Civil Code section 1798 et seq., to enjoin Respondent Board of Trustees of the California State University (“Respondent” or “CSU”) from disclosing employees’ personal information to federal agencies without first providing notice to affected employees and an opportunity to challenge the anticipated disclosure in court.

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1 2. The California Constitution contains a robust and explicit right to privacy, greater
2 than what is guaranteed by the United States Constitution. (Cal. Const., art. I, § 1; see *Hill v.*
3 *National Collegiate Athletic Assn.* (1994) 7 Cal.4th 1, 15.)

4 3. Public sector employees, such as the CSU tenure-track faculty, lecturers, coaches,
5 counselors, and librarians represented by CFA, do not give up their constitutional right to privacy
6 by virtue of public employment.

7 4. Recently, in response to a federal subpoena for information related only to
8 employees at California State University, Los Angeles, CSU turned over personal information—
9 including race, gender, reasons for employment separation (if any), and personal telephone
10 numbers and email addresses—to the U.S. Equal Employment Opportunity Commission
11 (“EEOC”). Affected Petitioners learned about this breach of their personal information after it
12 occurred and were therefore unable to seek injunctive relief in state or federal court to challenge
13 disclosure of sensitive information beyond the scope the EEOC’s reasonable subpoena authority.

14 5. This disclosure violated both Article I, section 1 of the California Constitution and
15 the Information Practices Act, which requires public agencies to provide notice to affected
16 individuals in advance of disclosure in response to a subpoena. (Civ. Code, § 1798.25, subd. (k).)
17 What is more, Respondent recently announced that the EEOC has initiated a broader, system-
18 wide complaint and investigation. Petitioners have every reason to expect that the EEOC’s
19 broader investigation will include a subpoena for personal information from CSU employees
20 across the state and that CSU will comply without providing advance notice to affected
21 individuals. Petitioners therefore seek a declaration of their rights and CSU’s obligations with
22 respect to disclosure of personal information and a writ of mandate and injunction directing CSU
23 to comply with its duty to protect employees’ privacy by providing notice sufficient to allow
24 employees to challenge any anticipated disclosure of personal information before it takes place.

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1 **JURISDICTION AND VENUE**

2 6. This Court has jurisdiction under Article VI, section 10 of the California
3 Constitution and Code of Civil Procedure sections 526, 1060, and 1085 and Civil Code section
4 1798.45.

5 7. Venue is proper in this Court because the Board of Trustees of CSU maintains
6 campuses and its headquarters office in Los Angeles County and because the Board of Trustees
7 of CSU has performed acts that have caused and will continue to cause legal injuries and
8 deprivations of rights to persons in Los Angeles County. The case is properly filed in the Central
9 District of the Los Angeles County Superior Court under Local Rule 2.3 because it seeks a writ
10 of mandate.

11 **PARTIES**

12 8. Petitioner/Plaintiff (“Petitioner”) California Faculty Association (“CFA”) is a
13 labor organization and the exclusive bargaining representative for a unit of over 25,000 tenure-
14 track faculty, lecturers, coaches, counselors, and librarians employed by CSU. CFA brings this
15 action on behalf of its members.

16 9. Petitioner Margarita Berta-Ávila is a professor at California State University,
17 Sacramento (“Sacramento State”), is employed by CSU, and is a member and the current
18 president of CFA.

19 10. Petitioner Loren Cannon is a lecturer at California State Polytechnic University,
20 Humboldt (“Cal Poly Humboldt”), is employed by CSU, and is a member of CFA.

21 11. Petitioner Christopher Cox is a lecturer at California State University, San Jose
22 (“San Jose State”), is employed by CSU, and is a member of CFA.

23 12. Petitioner Molly Talcott is a professor at California State University, Los Angeles
24 (“Cal State LA”), is employed by CSU, and is a member of CFA.

25 13. Petitioner Ericka Verba is a professor at California State University, Los Angeles
26 (“Cal State LA”), is employed by CSU, and is a member of CFA.

27 14. Petitioners Berta-Ávila, Cannon, Cox, Talcott, and Verba are referred to
28 collectively herein as “Individual Petitioners.”

1 15. Respondent/Defendant (“Respondent”) Board of Trustees of the California State
2 University (“Board of Trustees”) is the governing body created by statute to administer the
3 California State University (“CSU”), which consists of its 25 campuses. (Ed. Code, §§ 66600,
4 89001.)

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6 **FACTUAL ALLEGATIONS**

7 **A. Respondent’s Disclosure of Personal Information Pertaining to Cal State LA**
8 **Employees**

9 16. Cal State LA has been the subject of an EEOC investigation since at least April
10 2025. The EEOC investigation stems from charges of antisemitism based on statements and
11 activism by Cal State LA students, faculty, and others, criticizing the State of Israel’s actions
12 with respect to Palestinians in Gaza and related matters. The charges name both CSU and CFA as
13 respondents.

14 17. On or about August 11, 2025, Cal State LA’s Vice President of Administration and
15 Finance sent an email to faculty and staff at Cal State LA notifying them that the EEOC had
16 requested contact information for all employees, that Cal State LA provided employees’ publicly
17 available contact information in response, and that employees might be contacted in reference to
18 the EEOC’s investigation.

19 18. On or about September 25, 2025, an administrator at Cal State LA sent an email
20 to faculty and staff with an update regarding the ongoing EEOC investigation. The email
21 informed faculty and staff that the EEOC had previously requested employee contact information
22 and that the university had provided publicly available university contact details. The email also
23 said, “The EEOC is now requiring, through a federal subpoena, that the university produce
24 personal phone numbers and email addresses for all employees.” The email indicated that the
25 university was “legally required to respond” and intended to comply with the EEOC’s subpoena.

26 19. On September 26, 2025, CFA emailed Cal State LA’s Provost; Associate Vice
27 President, Office of Faculty Affairs; and legal counsel, requesting a copy of the EEOC subpoena
28 referenced in Cal State LA’s September 25, 2025 email to faculty and staff, stating CFA’s belief
that a request for all faculty’s personal contact information was beyond EEOC’s subpoena

1 authority, and demanding that Cal State LA not comply with the subpoena until CFA had an
2 opportunity to review the subpoena and seek to narrow its scope.

3 20. On September 29, 2025, CFA received acknowledgments of its September 26,
4 2025 demand, but no substantive response.

5 21. On October 1, 2025, a Senior Director of Labor and Employee Relations from
6 CSU contacted CFA through its counsel via email. In this communication, CSU provided a copy
7 of the EEOC subpoena and a description of CSU's response to the subpoena.

8 22. The subpoena sought the name, gender, race, position titles, full- or part-time
9 status, work site location, name of supervisor, date of hire, date of separation, reason for
10 separation, and personal contact information including last known address, email address,
11 telephone, and cellular number of any and all employees who worked for Cal State LA from
12 October 7, 2023 to the present.

13 23. CSU's October 1, 2025, email informed CFA that as of that date, CSU had already
14 disclosed all of the information sought in the EEOC's subpoena except home addresses, which
15 CSU had petitioned to exclude from required disclosure.

16 **B. Systemwide Investigations of CSU by EEOC and U.S. Department of**
17 **Education**

18 24. On September 29, 2025, Mildred García, Chancellor of CSU, sent an email to all
19 CSU employees informing them that (1) the EEOC had initiated a systemwide antisemitism
20 complaint against CSU, and (2) the U.S. Department of Education, Office of Civil Rights, had
21 notified the CSU of alleged racial discrimination due to interactions with an outside organization
22 called the PhD Project.

23 **C. Recent Use of EEOC and Department of Education Investigations to Target**
24 **Individuals Based on Their Political Views**

25 25. Upon information and belief, since January 2025, the federal government has
26 been targeting institutions of higher education and their students and faculty based on the content
27 of their scholarship, teaching, speech, and political activism.

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1 26. On January 29, 2025, President Trump signed Executive Order 14188, titled
2 “Additional Measures To Combat Anti-Semitism.” (Exec. Order No. 14188, 90 Fed. Reg. 8847
3 (Feb. 3, 2025).)

4 27. According to the White House Fact Sheet on Executive Order 14188, President
5 Trump has promised to deport “ Hamas [s]sympathizers,” stating: “To all the resident aliens who
6 joined in the pro-jihadist protests, we put you on notice: come 2025, we will find you, and we
7 will deport you. I will also quickly cancel the student visas of all Hamas sympathizers on college
8 campuses, which have been infested with radicalism like never before.”¹

9 28. Upon information and belief, under Executive Order 14188, the Trump
10 administration has aggressively sought to curtail speech at universities. Through federal agencies
11 such as the Department of Health and Human Services, the Department of Education, and the
12 U.S. General Services Administration, the administration has threatened to cut federal funding if
13 universities fail to act in a manner that is consistent with the administration’s views on diversity,
14 equity, and inclusion; gender; and the Israel-Palestine conflict.

15 29. Upon information and belief, the EEOC has fully embraced President Trump’s
16 campaign to target and punish universities and university faculty for espousing views the
17 President disagrees with.

18 30. Upon information and belief, in January 2024, President Trump fired two EEOC
19 commissioners and appointed Andrea Lucas as acting EEOC chair.

20 31. Upon information and belief, in her confirmation hearing in June 2025, Lucas
21 repeatedly affirmed that the EEOC is not an independent agency and that she would follow
22 President Trump’s executive orders. For example, the EEOC dropped several cases on behalf of
23 transgender or gender nonconforming workers in deference to President Trump’s order declaring
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27 ¹ *Fact Sheet: President Donald J. Trump Takes Forceful and Unprecedented Steps to Combat*
28 *Anti-Semitism* (Jan. 30, 2025) The White House <<https://www.whitehouse.gov/fact-sheets/2025/01/fact-sheet-president-donald-j-trump-takes-forceful-and-unprecedented-steps-to-combat-anti-semitism/>> (as of Oct. 9, 2025).

1 there are only two biological, immutable sexes. “As head of the EEOC, I’m committed to
2 dismantling the identity politics that have plagued our civil rights laws,” Lucas said.²

3 32. Upon information and belief, pressure on universities from federal agencies has
4 led several prominent institutions to make significant concessions, including to curricular
5 choices.

6 33. Upon information and belief, in July 2025, Columbia University settled an EEOC
7 Commissioner’s charge on behalf of all Jewish employees related to political protest and
8 activism which included a payment of \$21 million.³ After the settlement was announced, on July
9 25, U.S. Secretary of Education Linda McMahon posted on social media, “The deal with
10 Columbia should serve as a roadmap for institutions across the country.”⁴

11 34. Upon information and belief, through other charges and investigations, the EEOC,
12 U.S. Department of Education, and other federal agencies have sought private information as
13 well as information related to speech, scholarship, and political activism by university employees
14 and students in order to assert ideological control over institutions of higher education.

15 35. Upon information and belief, federal agency investigations targeting
16 “antisemitism” have led to university faculty being suspended and dismissed from their
17 positions.

18 36. According to news reports, University of California, Berkeley, provided the
19 personal information of approximately 160 students, staff, and faculty to the federal government
20 in connection to an investigation by the U.S. Department of Education, Office of Civil Rights.⁵

21 ² Olson & Savage, *Acting head of civil rights agency defends decisions undercutting*
22 *transgender workers* Associated Press (June 18, 2025) <<https://apnews.com/article/eeoc-andrea-lucas-senate-hearing-dei-transgender-8cb16648226adc24f04f85bc9a166d21>> (as of Oct. 9,
23 2025).

24 ³ *In Largest EEOC Public Settlement in Almost 20 Years, Columbia University Agrees to Pay*
\$21 Million to Resolve EEOC Antisemitism Charges EEOC Website (July 25, 2025),
25 <<https://www.eeoc.gov/newsroom/largest-eeoc-public-settlement-almost-20-years-columbia-university-agrees-pay-21-million>> (as of Oct. 9, 2025).

26 ⁴ Secretary Linda McMahon (@EDSecMcMahon), X.com (Jul. 25, 2025, 10:53 AM ET)
27 <<https://x.com/EDSecMcMahon/status/1948758537468792992>> (as of Oct. 9, 2025).

28 ⁵ Mukherjee, *UC Berkeley turns over personal information of more than 150 students and staff to federal government*, Daily Californian (Sep. 10, 2025)
<https://www.dailycal.org/news/campus/uc-berkeley-turns-over-personal-information-of-more->

1 Previously, the University of California responded to an EEOC subpoena with personal contact
2 information for hundreds of faculty who had signed open letters to the University of California
3 Board of Regents calling for the support of Jewish students and staff, as well as the safety of
4 those with ties to Palestine, and raising concerns about antisemitism.⁶

5 **D. CFA Members' Concerns Regarding the Disclosure of Private Information**
6 **to Federal Agencies in the Current Climate**

7 37. CFA is informed and believes, and thereon alleges, that EEOC did not make
8 significant efforts to contact faculty at Cal State LA through their publicly available CSU email
9 addresses or telephone numbers before it subpoenaed employees' personal email addresses and
10 telephone numbers.

11 38. Petitioners Talcott and Verba and Petitioner CFA's members who are employed at
12 Cal State LA fear that disclosure of their personal email addresses and telephone numbers to the
13 federal government will allow the federal government to surveil their email, telephone records,
14 and social media or other accounts associated with their personal email addresses or telephone
15 numbers.

16 39. The gender, race, and employment information for all Cal State LA employees
17 sought by EEOC and disclosed by CSU exceeds the scope of what is relevant to the EEOC's
18 investigation into allegations of antisemitism. Disclosure of this information to the federal
19 government constitutes an invasion of privacy.

20 40. Individual Petitioners and Petitioner CFA's members fear that the EEOC and U.S.
21 Department of Education will seek additional personal employee records and personal contact
22 information from CSU. Petitioners, including Petitioner CFA on behalf of its members, fear that
23 the EEOC and U.S. Department of Education may seek not only personal contact information of

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25 [than-150-students-and-staff-to-federal/article_a4aad3e1-bbba-42cc-92d7-a7964d9641c5.html](https://www.dailyca.org/news/campus/hundreds-of-uc-faculty-personal-information-turned-over-to-trump-administration-in-antisemitism-investigation/article_a4aad3e1-bbba-42cc-92d7-a7964d9641c5.html) (as
of Oct. 9, 2025).

26 ⁶ Vazquez, *Hundreds of UC faculty personal information turned over to Trump administration in*
antisemitism investigation, Daily Californian (Apr. 8, 2025)

27 [https://www.dailyca.org/news/campus/hundreds-of-uc-faculty-personal-information-turned-](https://www.dailyca.org/news/campus/hundreds-of-uc-faculty-personal-information-turned-over-to-trump-administration-in-antisemitism-investigation/article_37ace7b8-461d-4d6a-b66d-b42fb99529c7.html)
28 [over-to-trump-administration-in-antisemitism-investigation/article_37ace7b8-461d-4d6a-b66d-](https://www.dailyca.org/news/campus/hundreds-of-uc-faculty-personal-information-turned-over-to-trump-administration-in-antisemitism-investigation/article_37ace7b8-461d-4d6a-b66d-b42fb99529c7.html)
[b42fb99529c7.html](https://www.dailyca.org/news/campus/hundreds-of-uc-faculty-personal-information-turned-over-to-trump-administration-in-antisemitism-investigation/article_37ace7b8-461d-4d6a-b66d-b42fb99529c7.html) (as of Oct. 9, 2025).

1 all employees in the CSU system but also internal campus communications and academic
2 writings, subjecting Petitioners, including all of Petitioner CFA's members, to scrutiny based on
3 their scholarship in addition to their political views or activism.

4 **LEGAL FRAMEWORK**

5 41. Article I, section 1 of the California Constitution provides that "[a]ll people are by
6 nature free and independent and have inalienable rights. Among these are enjoying and
7 defending life and liberty, acquiring, possessing, and protecting property, and pursuing and
8 obtaining safety, happiness, and *privacy*." (Italics added.) This provision creates a right to
9 privacy more protective than the implicit privacy protections in the United States Constitution.
10 (*In re Carmen M.* (2006) 141 Cal.App.4th 478, 491, fn. 11.) The right to privacy protects the
11 right to informational and autonomy privacy, and the right to be free from government intrusion
12 into private lives. (*Hill v. NCAA, supra*, 7 Cal.4th 1, 35-36.)

13 42. The ballot materials for the 1972 initiative that created the right to privacy at
14 Article I, section 1 of the California Constitution (the Privacy Initiative) demonstrate that the
15 provision specifically protects privacy with respect to freedoms encompassed by other
16 constitutional protections, such as Article I, section 2, freedom of expression and freedom of
17 association. "The right of privacy is the right to be left alone. It is a fundamental and compelling
18 interest. It protects our homes, our families, our thoughts, our emotions, our expressions, our
19 personalities, our freedom of communion, and our freedom to associate with the people we
20 choose."⁷ "Fundamental to our privacy is the ability to control circulation of personal
21 information."⁸

22 43. The Information Practices Act, Civil Code section 1798 et seq., limits the right of
23 government agencies to disclose personal information. It limits the disclosure of "personal
24 information" that identifies or describes an individual, including but not limited to an
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27 ⁷ Ballot Pamp., Gen. Elec. (Nov. 7, 1972), p. 27
28 <https://repository.uclawsf.edu/ca_ballot_props/762> (as of Oct. 9, 2025).

⁸ *Id.*

individual’s name, home telephone number, home address, employment history, and “statements made by, or attributed to, the individual.” (Civ. Code §§ 1798.3, subd. (a); 1798.24.)

44. Under the Information Practices Act, a state agency may disclose personal information “pursuant to a subpoena, court order, or other compulsory legal process if, before the disclosure, the agency reasonably attempts to notify the individual to whom the record pertains, and if the notification is not prohibited by law.” (Civ. Code § 1798.24, subd. (k).)

45. Requiring notice to an individual prior to anticipated disclosure of personal information is an essential safeguard to effectuate California’s constitutional right to privacy (See, e.g., Code Civ. Proc. § 1985.3 [requiring advance notice to individuals whose consumer or employment records are sought through a subpoena].) Indeed, where statutory schemes do not require such notice prior to disclosure of personal information, courts have created rules to ensure that individuals whose personal information is sought are provided notice and a fair opportunity to assert their interests by objecting to the disclosure. (See *Gilbert v. City of San Jose* (2003) 114 Cal.App.4th 606, 613-616.)

46. In order to protect constitutional privacy rights implicated by public agencies’ competing duties to disclose public records, California courts have recognized a “reverse-CPRA” claim, in which an employee may—through a writ of mandate under Code of Civil Procedure section 1085—seek to preclude disclosure of private information that his or her public employer would otherwise disclose in response to a California Public Records Act request. (See, e.g., *Associated Chino Teachers v. Chino Valley Unified Sch. Dist.* (2018) 30 Cal.App.5th 530.) Under the California Public Records Act, personal telephone numbers and addresses are *not* considered public records. (Gov. Code § 7928.300.) Personnel records may not be disclosed over an employee’s objection unless the privacy interests are *de minimis* or the public’s interest in disclosure outweighs harm to the employee’s privacy interest.

MANDAMUS RELIEF ALLEGATIONS

47. Respondent has a clear, present, and ministerial duty under Article I, section 1 of the California Constitution and under the Information Practices Act, Civil Code section 1798 et

1 seq., not to disclose employees' personal information without providing reasonable notice and an
2 opportunity to object to the disclosure in a court of law.

3 48. Individual Petitioners and Petitioner CFA's members have a clear, present, and
4 beneficial interest in Respondent's execution of its duty to provide notice and an opportunity to
5 object to disclosure of their personal information.

6 49. Petitioners have no adequate remedy at law to compel Respondent to carry out its
7 duty to provide notice and an opportunity to object prior to disclosing Petitioners' (including
8 Petitioner CFA's members') personal information.

9 **INJUNCTIVE AND DECLARATORY RELIEF ALLEGATIONS**

10 50. An actual controversy exists between Petitioners and Respondent as to their
11 respective legal rights and duties. Petitioners contend that Respondent violated the rights of
12 Individual Petitioners and Petitioner CFA's members under Article I, section 1 of the California
13 Constitution and the Information Practices Act by disclosing personal information to the EEOC
14 in response to a subpoena without first providing employees notice of the anticipated disclosure
15 and an opportunity to challenge it in court and that any future disclosure by Respondent will
16 similarly violate Petitioners' rights. Respondent contends that it did not violate Petitioners' rights
17 and that it has no duty to provide notice and an opportunity to challenge disclosure of
18 information in response to a subpoena.

19 51. If an injunction does not issue enjoining Respondent from disclosing Individual
20 Petitioners' and Petitioner CFA's members' personal information in response to federal
21 subpoenas without first notifying the individuals whose information is being disclosed in a
22 manner that allows them an opportunity to challenge the disclosure before it happens, Individual
23 Petitioners and Petitioner CFA's members will be irreparably harmed.

24 52. Petitioners have no plain, speedy, and adequate remedy at law.

25 53. If not enjoined by this Court, Respondent will continue to disclose employees'
26 personal information in derogation of the rights of the Individual Petitioners and Petitioner CFA's
27 members.

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1 **FIRST CAUSE OF ACTION**

2 **Violation of Article I, Section 1 of the California Constitution**

3 (By all Petitioners Against Respondent)

4 54. Petitioners reallege and incorporate by reference the allegations contained in
5 paragraphs 1 through 53 as though fully set forth herein.

6 55. Article I, section 1 of the California Constitution protects the rights of Individual
7 Petitioners and Petitioner CFA's members to privacy.

8 56. In order to preserve and protect the state constitutional privacy rights of public
9 employees, public employers such as Respondent must provide employees notice of any
10 anticipated disclosure of personal information and opportunity to challenge such disclosure
11 before it takes place.

12 57. By disclosing the personal information of employees who work at Cal State LA,
13 including Petitioners Talcott and Verba and Petitioner CFA's members, to the EEOC without
14 prior notice and an opportunity to challenge the disclosure, Respondent violated their rights
15 under Article I, section 1 of the California Constitution.

16 58. Petitioners are informed and believe and thereon allege that Respondent is likely
17 to receive additional subpoenas and other requests for information from the EEOC and other
18 federal agencies and that, unless enjoined, Respondent will continue to disclose its employees'
19 personal information without providing advance notice and an opportunity to challenge the
20 disclosure, in violation of the rights of Individual Petitioners and Petitioner CFA's members
21 under Article I, section 1 of the California Constitution.

22 **SECOND CAUSE OF ACTION**

23 **Violation of Civil Code Section 1498.25**

24 (By all Petitioners Against Respondent)

25 59. Petitioners reallege and incorporate by reference the allegations contained in
26 paragraphs 1 through 58 as though fully set forth herein.

27 60. The Information Practices Act, Civil Code section 1798 et seq., limits public
28 agencies' collection, maintenance, and dissemination of individuals' personal information.

61. By disclosing the personal information of employees who work at Cal State LA, including Petitioners Talcott and Verba and Petitioner CFA's members, to the EEOC without prior notice and an opportunity to challenge the disclosure, Respondent violated their rights under the Information Practices Act, including Civil Code section 1798.24.

62. Petitioners are informed and believe and thereon allege that Respondent is likely to receive additional subpoenas and other requests for information from the EEOC and other federal agencies and that, unless enjoined, Respondent will continue to disclose its employees' personal information without providing advance notice and an opportunity to challenge the disclosure, in violation of the rights of Individual Petitioners and Petitioner CFA's members under the Information Practices Act, including Civil Code section 1798.24.

PRAYER FOR RELIEF

WHEREFORE, Petitioners respectfully request that the Court:

1. Issue a declaration that Respondent's disclosure of Individual Petitioners' and Petitioner CFA's members' personal information to the EEOC without prior notice and an opportunity to object to the disclosure violates Article I, section 1 of the California Constitution and the Information Practices Act, including Civil Code § 1798.25;
2. Issue a writ of mandate directing Respondent to provide notice in advance of any anticipated disclosure of the personal information of the Individual Petitioners or Petitioner CFA's members with sufficient specificity and time to allow affected persons to challenge, or seek to prevent, the disclosure through legal action;
3. Issue an injunction directing Respondent to provide notice in advance of any anticipated disclosure of the personal information of the Individual Petitioners or Petitioner CFA's members with sufficient specificity and time to allow affected persons to challenge, or seek to prevent, the disclosure through legal action;

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- 4. Order Respondent to pay Petitioners’ attorneys’ fees and costs pursuant to Civil Code section 1798.45, Code of Civil Procedure section 1021.5, and any other applicable statutes; and
- 5. Grant Petitioners such further relief as the Court deems just and proper.

DATED: October 10, 2025

JULIA HARUMI MASS
SARA DENK
ROTHNER, SEGALL & GREENSTONE

By: /s/ Julia Harumi Mass
JULIA HARUMI MASS
Attorneys for Plaintiff
CALIFORNIA FACULTY ASSOCIATION

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