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Attorneys for Defendants/Respondents,
SACRAMENTO MUNICIPAL UTILITY DISTRICT
and **PAUL LAU**

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SACRAMENTO

ASIAN AMERICAN LIBERATION
NETWORK, a California non-profit
public benefit association; **KHURSHID**
KHOJA, an individual; **ALFONSO**
NGUYEN, an individual,

Plaintiffs and Petitioners,

vs.

SACRAMENTO MUNICIPAL UTILITY
DISTRICT; **PAUL LAU**, in his office capacity
as the Chief Executive Officer of the
Sacramento Municipal Utility District; **CITY**
OF SACRAMENTO; **KATHERINE LESTER**,
in her official capacity as Chief of Police of
the City of Sacramento Police Department,

Defendants and Respondents.

Case No. 34-2022-80004019

RESPONDENTS SACRAMENTO
MUNICIPAL UTILITY DISTRICT AND
PAUL LAU'S FINAL RETURN TO WRIT
OF PREEMPTORY MANDATE

Action Filed: September 21, 2022

1 Respondents SACRAMENTO MUNICIPAL UTILITY DISTRICT (“SMUD”) and PAUL
2 LAU, in his official capacity, (SMUD and Mr. Lau, collectively, “SMUD Defendants”) submit
3 this Final Return to Writ of Preemptory Mandate pursuant to the Court’s Judgment dated January
4 8, 2026 (the Court’s Judgment”):

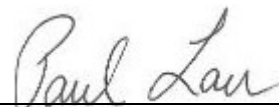
- 5 1. SMUD Defendants have not provided law enforcement any “ZIP code lists” with
6 residential customer utility usage data pursuant to law enforcement request since January
7 15, 2025.
- 8 2. SMUD Defendants have not received a request from law enforcement for the subject ZIP
9 code lists since November 26, 2024. The data provision referenced in Paragraph 1 hereto
10 was SMUD’s response to that November 26, 2024 request.
- 11 3. SMUD Defendants will not provide such ZIP code lists to law enforcement absent a
12 federal or state court order or valid warrant. SMUD’s loss protection department has been
13 instructed that no further ZIP code requests by law enforcement will be honored absent a
14 federal or state court order or valid warrant.

15 WHEREFORE, SMUD Defendants respectfully submit that each has complied with the
16 Peremptory Writ of Mandate and request that this Court accept this return.

17
18 DATED: May 20, 2026

SACRAMENTO MUNICIPAL UTILITY DISTRICT

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20 By:


21 PAUL LAU, CEO of Sacramento Municipal
22 Utility District
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1 **CALIFORNIA STATE COURT PROOF OF SERVICE**
2 *Asian American Liberation Network, et al. v. Sacramento Municipal Utility District, et al.*
3 Sacramento County Superior Court, Case No. 34-2022-80004019

4 STATE OF CALIFORNIA, COUNTY OF SACRAMENTO

5 At the time of service, I was over 18 years of age and not a party to this action. My business
6 address is 2485 Natomas Park Drive, Suite 450, Sacramento, CA 95833.

7 On **May 28, 2026**, I served true copies of the following document(s):

8 **RESPONDENTS SACRAMENTO MUNICIPAL UTILITY DISTRICT AND PAUL LAU's**
9 **FINAL RETURN TO PREEMPTORY WRIT OF MANDATE**

10 I served the documents on the following persons at the following addresses (including fax
11 numbers and e-mail addresses, if applicable):

12 **SEE ATTACHED SERVICE LIST**

13 The documents were served by the following means:

14 ☒ **(BY E-MAIL OR ELECTRONIC TRANSMISSION)** Based on a court order or an
15 agreement of the parties to accept service by e-mail or electronic transmission, I caused the
16 documents to be sent from e-mail address roxy.chipak@lewisbrisbois.com to the persons at
17 the e-mail addresses listed above. I did not receive, within a reasonable time after the
18 transmission, any electronic message or other indication that the transmission was
19 unsuccessful.

20 I declare under penalty of perjury under the laws of the State of California that the foregoing
21 is true and correct.

22 Executed on **May 28, 2026**, at Sacramento, California.

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Roxy A. Chipak

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SERVICE LIST

Asian American Liberation Network, et al. v. Sacramento Municipal Utility District, et al.
Sacramento County Superior Court, Case No. 34-2022-80004019

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