

06/07/2018

Clerk of the Court  
San Jose, CA 95113

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10 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
 11 COUNTY OF SAN FRANCISCO  
 12 UNLIMITED JURISDICTION

13 PEOPLE OF THE STATE OF CALIFORNIA,  
 by and through DENNIS J. HERRERA, City  
 Attorney for the CITY AND COUNTY OF  
 SAN FRANCISCO,

14 Plaintiff,

15 vs.

16 DOWNS BELOW GANGSTERS aka DBG, a  
 17 criminal street gang used as an unincorporated  
 18 association, TOWERSIDE GANG, a criminal  
 19 street gang used as an unincorporated  
 20 association, and DOE ONE through DOE  
 21 FIVE UNKNOWN, inclusive,

22 Defendants.

Case No. CDC 18-06282

MEMORANDUM OF POINTS AND  
 23 AUTHORITIES IN SUPPORT OF PLAINTIFF'S  
 24 MOTION TO MODIFY PERMANENT  
 25 INJUNCTION RELATED TO DOWNS BELOW  
 26 GANGSTERS aka DBG and TOWERSIDE GANG

(California Civil Code §424, California Code of  
 27 Civil Procedure §377)

28 **Reservation No. 000071245**

Hearing Date: July 12, 2018  
 Hearing Judge: Hon. Harold Kahn  
 Time: 9:30 a.m.  
 Floor: Dept. 302

Date of Injunction: February 17, 2011

Plaintiff People of the State of California seek to modify the Permanent Injunction issued by  
 the San Francisco Superior Court on February 17, 2011 against Defendants DOWNS BELOW  
 GANGSTERS aka DBG ("DBG") and TOWERSIDE GANG ("TOWERSIDE"). This Permanent  
 Injunction is currently enforceable against Defendants DBG and TOWERSIDE, and 41 named non-