

CLAIM AGAINST THE COUNTY OF SAN MATEO

(Please print legibly or type. Please do not use pencil)

Claimant's Name:	Victor Aenlle		
Claimant's Address:	c/o Long & Levit LLP 465 California Street, 5th Floor		
City: San Francisco	State: CA	ZIP Code: 94104	Phone: (415) 397-2222
Amount of Claim:	The amount of the claim is presently unknown but higher than \$10,000.00. The amount is increasing as defense costs and legal fees are incurred. The claim is not a limited civil case.		

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Address to which notices are to be sent (if different than above):

Date of incident: 8/22/24; 11/17/24 and continuing	Location of Incident: County of San Mateo, Office of the County Attorney, 500 County Center, 4th Floor, Redwood City, CA 94063
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WHAT particular action by the County or its employees caused the alleged damage or injury. How did it occur (describe damage or loss): County Counsel has repeatedly informed the Claimant that the County asserts it has no duty to defend or indemnify him regarding the allegations against him in *David Wozniak v. County of San Mateo, et al.*, U.S. District Court, N.D. Cal., Case No. 24-cv-04023-MMC notwithstanding that the Claimant was an employee (even when classified as an independent contractor) of the San Mateo County Sherriff's office and sued in his capacity as such. As a result, the Claimant has had to retain counsel at his own expense and pay all fees and costs to protect his interests in the litigation. The County's refusal to provide defense and indemnification to the Claimant violates applicable law, including but not limited to California Government Code Sections 995 and 996.4.

Name of Public Employee(s) causing injury, damage, or loss (if known):

1. Unknown who formulated the County's position as summarized above; Karen Rosenthal, Lead Deputy County Attorney, has repeatedly articulated the County's position as summarized above.

Itemization of Claim: List Item(s) that total the amount above:

1. Attorney's fees	Amount presently unknown but increasing
2. Litigation costs	Amount presently unknown but increasing
3. Indemnification for any future judgment against Aenlle in the Wozniak case	Amount presently unknown
TOTAL	Amount presently unknown but increasing

I declare under penalty of perjury that the foregoing is true and correct:

Dated at San Francisco, California,

on February 14, 2025.

Signature of Claimant:  (signed by Claimant's counsel Douglas J. Melton)

Return to: CLAIMS, Board of Supervisors, 400 County Center, Redwood City, CA 94063

1 **PROOF OF SERVICE**

2 I, the undersigned, declare:

3 I am a citizen of the United States and employed in San Francisco County, California. I
4 am over the age of eighteen years and not a party to the within-entitled action. My business
address is 465 California Street, 5th Floor, San Francisco, California 94104.

5 On February 14, 2025, I served the document(s) named below on the following attorney(s)
6 of record and/or interested parties in the case of *David Wozniak v. County of San Mateo, et al.*,
U.S.D.C., Northern District of California Case No. 3:24-cv-04023-MMC.

7 **CLAIMS FORM**

8 **Claims – County of San Mateo**

9 **Attorneys for County of San Mateo**

10 CLAIMS, Board of Supervisors
400 County Center
11 Redwood City, CA 94063

John D. Nibbelin
Karen Rosenthal
Office of San Mateo County Counsel
500 County Center, 4th Floor
Redwood City, CA 94063-1664
Telephone: (650) 363-4693
Email: jnibbelin@smcgov.org
krosenthal@smcgov.org
drosas@smcgov.org



by placing the document(s) listed above in a sealed envelope with postage thereon
fully prepaid, in the United States mail at San Francisco, California addressed as
set forth below. I am readily familiar with the firm’s practice of collection and
processing correspondence for mailing. Under that practice it would be deposited
with the U.S. Postal Service on that same day with postage thereon fully prepaid in
the ordinary course of business.

17
18
19
20 I declare under penalty of perjury under the laws of the State of California that the above
is true and correct.

21 Executed on February 14, 2025, at San Francisco, California.

22
23
24 
Janie Crowley

LONG & LEVIT LLP

Bank Account: JPMorgan Chase Bank N.A.

Check Number: 000061999

Check Date: 02/14/2025

Payee: County of San Mateo

Vendor Number: 0023340

Inv. Date	Invoice No.	Description	Amount
02/14/2025	Email 2/14		25.00
			\$*****25.00

THE FACE OF THIS DOCUMENT HAS A COLORED BACKGROUND ON WHITE PAPER

LONG & LEVIT LLP

A Limited Liability Partnership

465 CALIFORNIA ST. SUITE 500
SAN FRANCISCO, CA 94104

JPMorgan Chase Bank N.A.
SAN FRANCISCO, CA

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1211

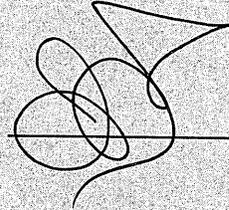
061999

Date
02/14/2025

Amount
\$*****25.00

Pay **Twenty Five and 00/100 Dollars**

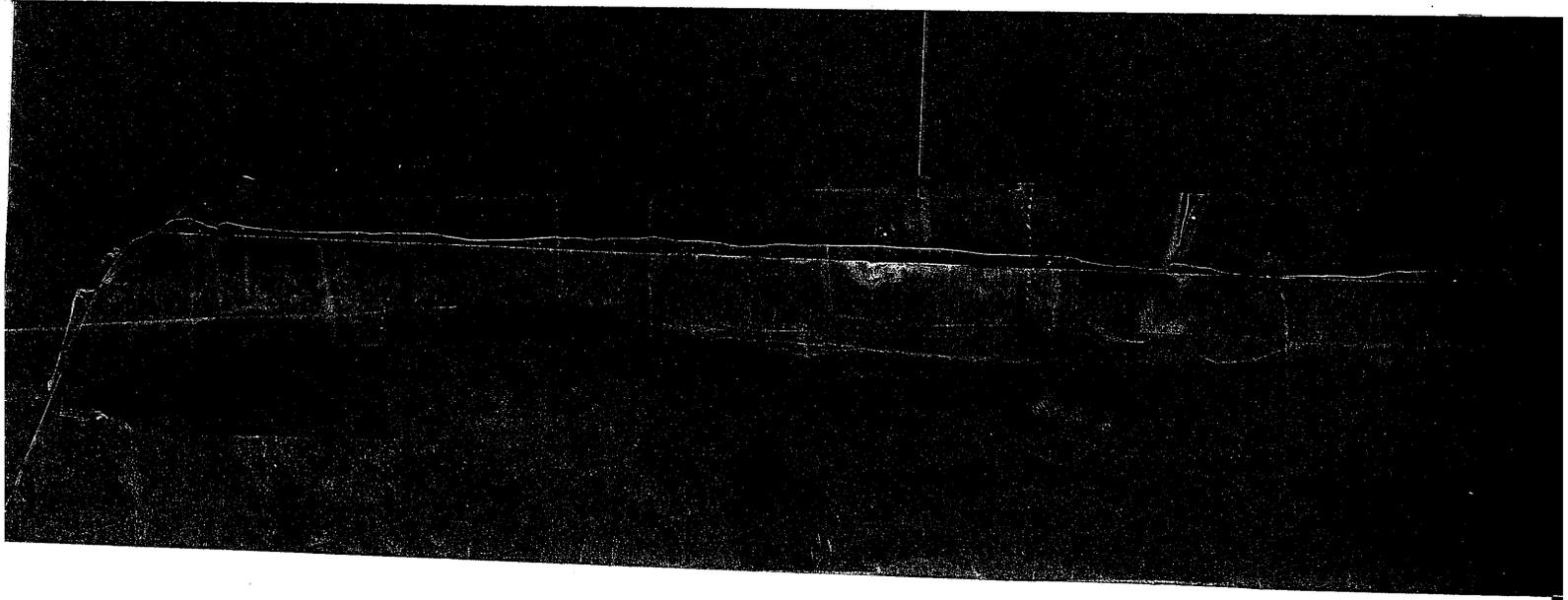
To the Order of **County of San Mateo**



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FADING WITH HEAT



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LONG & LEVIT LLP

ATTORNEYS AND COUNSELORS AT LAW

SAN FRANCISCO CA 9410

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BOARD OF SUPERVISORS

CLAIMS, Board of Supervisors
400 County Center
Redwood City, CA 94063

465 CALIFORNIA STREET, 5TH FLOOR, SAN FRANCISCO, CA 94104 | TEL: 415-397-2222 | FAX: 415-397-6392 | LONGLEVIT.COM

