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CITY OF ANAHEIM

10  
11 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 FOR THE COUNTY OF ORANGE, CENTRAL JUSTICE CENTER

13 CITY OF ANAHEIM, a charter city and  
14 municipal corporation,

15 Plaintiff,

16 vs.

17 ANGELS BASEBALL, L.P., a California  
18 limited partnership; and DOES 1 through 100,  
inclusive,

19 Defendants.

Case No.: 05CC01902

Judge: Hon. Peter J. Polos  
Dept.: C26

**DECLARATION OF CURT PRINGLE  
IN SUPPORT OF PLAINTIFF'S *EX PARTE*  
APPLICATION FOR ORDER TO SHOW  
CAUSE AND TEMPORARY  
RESTRAINING ORDER**

**Ex Parte Hearing**

Date: Jan. 7, 2005

Time: 9:00 a.m.

Dept.: C26

Action Filed: Jan. 5, 2005

Trial Date: None Set



1 that the City had that the team was making the official change in its name. The new name, if  
2 implemented, would minimize, if not eliminate, the visibility of Anaheim when the team name is  
3 used, particularly since the new name is a transparent plan to refer to the team as the "Los Angeles  
4 Angels" and to relegate Anaheim to the scrapheap of useless appendages.

5         5.         The team's transparent scheme is evident from the email that was transmitted on  
6 January 3, 2005 by Marty Sewell, the Media Relations Representative for the baseball team, to the  
7 media representatives of other major league baseball teams throughout the country. Attached as  
8 Exhibit "A" is a true and correct copy of that electronic mail transmission. The email advises the  
9 other team's media representatives:

10                   "Pleased be advised that our name has now been changed from  
11                   Anaheim Angels to Los Angeles Angels of Anaheim, effective  
12                   today. When scheduling, please use LA in place of ANA, and if you  
13                   should play against both us and the Dodgers, we would [be]  
14                   characterized by LAA."

15                 From now on line scores in television newscasts and scoreboards in other major league  
16 stadiums throughout the country, will list the scores of Angels games as LA instead of ANA.  
17 Other major league teams have been instructed to prepare their game schedules to show LA, not  
18 ANA.

19         6.         The City of Anaheim made a deal with the baseball team in 1996 to identify the  
20 team with the City of Anaheim. The City made numerous economic concessions in the Lease,  
21 concessions that are the obligations of Anaheim taxpayers. If the baseball company is not  
22 restrained from changing its name to the Los Angeles Angels of Anaheim, the baseball company  
23 would deprive the City of the essential benefit the City bargained for through the renaming of the  
24 team in 1996. This is a bargain that the Anaheim taxpayers have paid to receive and which they  
25 are entitled to receive.


26                 Executed on January 5, 2005, at Anaheim, California.

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

  
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Curt Pringle