



1 PAUL G. MAST (CA Bar No. 28390)  
2 [REDACTED]  
3 Telephone: [REDACTED]  
4 [REDACTED]

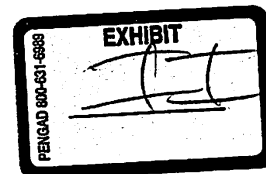
5 Respondent

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8 **BOARD OF ADMINISTRATION**  
9 **CALIFORNIA PUBLIC EMPLOYEES' RETIREMENT SYSTEM**

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11 In the matter of the Amount of Proper ) AGENCY CASE NO. 2010-0825  
12 Benefits Payable to )  
13 PAUL G. MAST, Judge, Ret. ) OAH NO. 2015-030996  
14 ) **MOTION TO ADD ISSUES**  
15 )  
16 ) Hearing Date: August 31, 2015  
17 ) Hearing Location: Los Angeles, CA  
18 ) Settlement Conf: None Scheduled

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20 **RESPONDENT PAUL G. MAST MAKES THIS MOTION TO ADD THE**  
21 **FOLLOWING ISSUES:**

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23 **That the Petitioner failed to pay Respondent retirement benefits pursuant to**  
24 **Government Code Section 75033.5 for the period from May 28, 1992 through May 27,**  
25 **1995.**



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That Petitioner failed in its fiduciary duty to advise Respondent of his rights to retirement benefits for said period.

Said right to retirement benefits include **vested** Cost of Living Adjustments as provided for in that certain Settlement Agreement attached as Exhibit A to the Statement of Issues, as well as provided for in *Olson v. Cory, I*, (1980) 27 Cal.3d 532, 636 P.2 532.

Said unpaid retirement benefits bear interest at 10% from the date each benefit payment was due, pursuant to *Olson v. Cory, II* (1982), 184 Cal.Rptr. 325, Code of Civil Procedure, §§ 3287, 3289 compounded daily as provided by law.

March 29, 2015

*Paul G Mast*

Paul G. Mast

**DECLARATION OF PAUL G. MAST**

PAUL G. MAST, hereby declares under penalty of perjury that the following is true and correct:

That theses issues deal with the calculation of benefits due Respondent and should be included in the determination of the calculation of benefits referred to in the Statement of Issues.

Paul G. Mast hereby declares under penalty of perjury that the foregoing is true and correct. Signed on March 28, 2015 at Irvine, California.

*Paul G Mast*

Paul G. Mast



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PROOF OF SERVICE

In the matter of the Amount of Proper Benefits Payable to Paul G. Mast.  
I am a resident of the State of California, over the age of eighteen years, not a party to  
this proceeding.  
My residence address is Marci Mast, [REDACTED].  
On March 29, 2015, I served the following document(s) by the method indicated below:

MOTION TO ADD ISSUES

by e-mailing the document(s) listed above

Jeff Rieger  
Harvey L. Leiderman, Esq.  
Reed Smith LLP  
"Rieger, Jeffrey R." <JRieger@ReedSmith.com>

I declare under penalty of perjury under the laws of the State of California that the  
above is true and correct. Executed on March 29, 2015, at Irvine, CA.

*Marci J Mast*  
\_\_\_\_\_  
Marci Mast