

ATTACHMENT C

RESPONDENT'S ARGUMENT

MAR 25 2020

1 LAW OFFICE OF STANLEY R. APPS
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4 Attorney for Respondent Myriam L. Zech
5

6 **BOARD OF ADMINISTRATION**
7 **CALIFORNIA PUBLIC EMPLOYEES' RETIREMENT SYSTEM**
8

9 In the Matter of the Application for Disability) Agency Case No.: 2019-0559
10 Retirement of)
) OAH No.: 2019081142
11 MYRIAM L. ZECH,)
) RESPONDENT'S MYRIAM ZECH'S
12 Respondent,) ARGUMENT IN FAVOR OF PROPOSED
) DECISION
13 and)
)
14 CALIFORNIA STATE WATER RESOURCES) Hearing Date: April 21, 2020
CONTROL BOARD,)
)
15 Respondent.)
16)

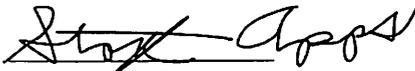
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18 **RESPONDENT MYRIAM ZECH'S ARGUMENT**
19 **IN FAVOR OF PROPOSED DECISION**

20 RESPONDENT, MYRIAM ZECH, has reviewed the Proposed Decision of Regina Brown,
21 Administrative Law Judge for the Office of Administrative Hearings, dated February 24, 2020.
22 Respondent concurs with the reasoning, findings, and conclusions of Judge Brown. Therefore,
23 Respondent urges the CalPERS Board of Administration to adopt the Proposed Decision to grant
24 Myriam Zech disability retirement.
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26 DATED: March 23, 2020
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LAW OFFICE OF STANLEY R. APPS

By: 

Stanley R. Apps (State Bar No. 309425)
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Attorney for RESPONDENT MYRIAM L. ZECH

1 **PROOF OF SERVICE**

2 I, the undersigned, declare:

3 I am a resident of California, over the age of 18 years, and not a party to this civil
4 action. My business address is 3707 Poinciana Drive, No. 81, Santa Clara, CA 95051. On March 23,
5 2020, I caused to be served in the manner indicated below the attached: **RESPONDENT**
MYRIAM ZECH'S ARGUMENT IN FAVOR OF PROPOSED DECISION

6 **BY UNITED STATES MAIL:** I enclosed the document in a sealed package and personally
7 caused it to be mailed via the United States Postal Service Priority mail to the following parties at
8 the below addresses:

8 Water Resources Control Board
9 P.O. Box 100
9 Sacramento, CA 95812-0100

10 Rory J. Coffey, Esq.
11 California Public Employees' Retirement System
12 Lincoln Plaza North
12 400 "Q" Street
13 Sacramento, CA 95811

14 Cheree Swedensky, Assistant to the Board
14 CalPERS Executive Office
15 P.O. Box 942701
15 Sacramento, CA 94229-2701

16 **BY ELECTRONIC TRANSMISSION:** I e-served the document to the following parties:

17
18 Rory J. Coffey, Esq.
19 Attorney for CalPERS
19 rory.coffey@calpers.ca.gov
20 kendall.schene@calpers.ca.gov

21 I declare under penalty of perjury that the above is true and correct.

22 Executed this 23d day of March, 2020, at Santa Clara, California.

23
24
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26 Stanley R. Apps
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