



DAVID CHIU
City Attorney

May 7, 2024

Barbara Leslie, President, Oakland Board of Port Commissioners
Members of the Oakland Board of Port Commissioners
Danny Wan, Executive Director
Mary C. Richardson, Port Attorney
Port of Oakland
530 Water Street
Oakland, CA 94607

Craig Simon
Interim Director of Aviation
Metropolitan Oakland International Airport
One Airport Drive
Oakland, CA 94621

Re: Request to Reconsider Final Adoption of the Proposed Renaming of
Metropolitan Oakland International Airport to Avoid Further Legal Action

Dear President Leslie, Members of the Board of Port Commissioners, Executive Director Wan,
Interim Aviation Director Simon, and Port Attorney Richardson:

On behalf of the City and County of San Francisco (the "City"), I write to once again strongly urge the Oakland Board of Port Commissioners (the "Port") to reconsider moving forward with the final adoption of its proposed ordinance authorizing the renaming of Metropolitan Oakland International Airport ("Oakland Airport") to "San Francisco Bay Oakland International Airport" and to instead engage in discussions with the City and others about a different name that would achieve the Port's objectives without infringing on the City's trademark and engendering consumer confusion and harm.

As you know, after the Port's initial April 11 approval of the renaming ordinance, my Office was left with no choice but to initiate litigation to protect San Francisco International Airport's ("SFO") trademark. Despite taking this legal action, I still firmly believe that the parties have an opportunity to engage in productive discussions to resolve the matter, particularly before the final adoption of the ordinance, currently scheduled for May 9. I am confident that by working together we can explore naming alternatives that will meet the Port's stated goals to increase flights at Oakland Airport and boost economic activity for the City of Oakland, while avoiding infringing on SFO's longstanding trademark and the very high likelihood of consumer

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Page 2
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and public confusion that ensue from the proposed name “San Francisco Bay Oakland International Airport.”

To be clear, should the Port decide to proceed to finally adopt the renaming ordinance, my Office will move forward with the pending litigation and will seek a preliminary injunction to stop this violation of the City’s rights and protect the public from the harm that the ensuing confusion and travel chaos is very likely to cause.

I look forward to your response.

Very truly yours,



DAVID CHIU
City Attorney

cc: Mayor London Breed
SFO Airport Director Ivar C. Satero
San Francisco Airport Commission
San Francisco Board of Supervisors