

**No. S286705  
IN THE SUPREME COURT  
OF THE  
STATE OF CALIFORNIA**

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Betty Long, et al.

*Plaintiffs and Respondents,*

v.

City of Exeter, et al.

*Defendants and Appellants.*

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On Review From The Court Of Appeal For the Second Appellate District,  
Division Six, Case No. B316324

After An Appeal From the Superior Court For The State of California,  
County of San Luis Obispo, Case Number 17CV0529

Hon. Barry T. LaBarbera

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**NOTICE OF SETTLEMENT IN PRINCIPLE AND JOINT REQUEST FOR STAY  
OF BRIEFING  
OR, IN THE ALTERNATIVE, FOR EXTENSION OF TIME TO FILE  
ANSWERING BRIEF ON THE MERITS**

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Family Trust, Rachel Fear, Steven Fear, Sarah Fear**

## **REQUEST FOR STAY OF BRIEFING**

The parties to this action, by and through their respective counsel of record, hereby jointly request a stay of briefing in this matter to allow the parties sufficient time to finalize and effectuate a settlement reached on January 23, 2025.

1. Plaintiffs and Respondents Betty Long, Rachel Fear, Steven Fear, and Sarah Fear filed a Petition for Review on September 3, 2024 and this Court granted Review on October 23, 2024.
2. Plaintiffs and Respondents requested and received two (2) 30-day extensions of time in which to file their Opening Brief on the Merits, in part based on the parties' ongoing settlement efforts.
3. Plaintiffs filed their Opening Brief on the Merits on January 22, 2025. Defendants' Answering Brief on the Merits is currently due on February 21, 2025.
4. The parties participated in an all-day mediation on December 10, 2024 with retired Justice Martin Tangeman, and a second mediation session on January 23, 2025, wherein the parties reached a settlement in principle.
5. The parties are currently in the process of completing a written settlement agreement.
6. The parties will need at least seventy-five (75) days after execution of the final settlement agreement to fulfill all of the terms, conditions, and covenants thereto. As part of this process, the parties agreed to make this joint request for a stay of briefing or an extension of time.

7. The parties' agreement is expected to fully and finally resolve this litigation and the parties wish to avoid the needless expenditure of resources and fees associated with the current briefing schedule in this Court.

8. The parties therefore jointly request an order staying the current briefing schedule, with a Request for Dismissal (subject to the Court's discretion) to be filed within ninety (90) days of the date of said order.

**ALTERNATIVE REQUEST FOR EXTENSION OF TIME IN  
WHICH TO FILE OPENING BRIEF ON THE MERITS**

9. In the alternative, should the Court not be inclined to order a stay of the briefing schedule, the parties hereby jointly request a seventy-five (75) day extension of time for Defendants to file their Answering Brief on the Merits, for all the reasons set forth above.

DATED: February 4, 2025

WILKE FLEURY LLP

By:           /s/ Suzanne M. Nicholson            
SUZANNE M. NICHOLSON  
Attorneys for City of Exeter, Brett  
Inglehart, Clifton Bush

DATED: February 4, 2025

By:           /s/ Steven B. Stevens            
STEVEN B. STEVENS  
Attorneys for Betty Long, Rachel  
Fear, Steven Fear, Sarah Fear

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**PROOF OF SERVICE**

**Long v. City of Exeter  
Supreme Court No. S286705**

**STATE OF CALIFORNIA, COUNTY OF SACRAMENTO**

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Sacramento, State of California. My business address is 621 Capitol Mall, Suite 900, Sacramento, CA 95814.

On February 4, 2025, I served true copies of the following document(s) described as **NOTICE OF SETTLEMENT IN PRINCIPLE AND REQUEST FOR STAY OF BRIEFING OR, IN THE ALTERNATIVE, FOR EXTENSION OF TIME TO FILE ANSWERING BRIEF ON THE MERITS** on the interested parties in this action as follows:

**SEE ATTACHED SERVICE LIST**

**BY ELECTRONIC SERVICE:** I electronically filed the document(s) with the Clerk of the Court by using the TrueFiling system. Participants in the case who are registered users will be served by the TrueFiling system. Participants in the case who are not registered users will be served by mail or by other means permitted by the court rules.

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

Executed on February 4, 2025, at Sacramento, California.

\_\_\_\_\_  
/s/ Shareen Khan  
Shareen Khan

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SERVICE LIST

**Long v. City of Exeter**  
**Second Appellate District, Division Six, No. B316324**  
**San Luis Obispo County Superior Court No. 17CV0529**  
**Supreme Court No. S286705**

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