Supreme Court no. S286705 Court of Appeal no. B316324 San Luis Obispo County Sup. Ct. no. 17CV0529

# The Supreme Court of State of California

Betty Long, et al.,

Plaintiffs-Respondents,

versus

City of Exeter, etc., et al.,

Defendants and Appellants.

### **Motion for Dismissal**

Raymond A. Cardozo (SBN 173263) rcardozo@reedsmith.com REED SMITH LLP 101 Second Street, Suite 2000 San Francisco, California 94105-3659 Telephone 415 543 8700 / Fax: 415 391 8269

Steven B. Stevens (SBN 106907) SBStevens@TheStevensFirm.Com STEVEN B. STEVENS, A PROF. CORP. 2934½ Beverly Glen Circle, Suite 477 Los Angeles, California 90077 Telephone 310 474 3474 / Fax: 310 470 6063

Counsel for Plaintiffs-Respondents Rachel Fear, Sarah Fear, Steven Fear, Diane E. McKenna, as Trustee of the Long Family Trust

#### **Motion for Dismissal**

The parties to this matter previously advised this Court that they reached a tentative settlement. (Joint Notice of Settlement, filed Feb. 4, 2025.) The parties resolved the terms of the settlement. The defendants have now paid the consideration.

Pursuant to the a term of the settlement, the plaintiffsrespondents Rachel Fear, Sarah Fear, Steven Fear, and Diane E. McKenna, as Trustee of the Long Family Trust, moves this Court for an order dismissing this review.

Respectfully submitted,

Steven B. Stevens, A Prof. Corp.

/s/ Steven B. Stevens

Reed Smith, LLP

/s/ Raymond A. Cardozo

Counsel for the Plaintiffs-Respondents Rachel Fear; Sarah Fear; Steven Fear; Diane E. McKenna, as Trustee of the Long Family Trust

#### PROOF OF SERVICE

## STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and am not a party to this action; my business address is Steven B. Stevens, A Prof. Corp., 2934½ Beverly Glen Circle, Suite 477, Los Angeles, California 90077. On April 4, 2025, I served the following document(s) described as **Motion for Dismissal** on the interested parties in this action as follows:

#### SEE ATTACHED SERVICE LIST

- **BY MAIL (Superior Court)**: By placing a true copy thereof in a sealed envelope addressed as above, and placing it for collection and mailing following ordinary business practices.
- BY ELECTRONIC SERVICE / TRUE FILING (Counsel):

  I served a PDF image of the document on all counsel, as listed on the True Filing proof of service and the attached proof of service.
- BY ELECTRONIC TRANSMISSION: I sent a true and correct copy of the aforementioned document to be transmitted to each of the parties at the electronic notification address last given by said party on any document which he or she has filed in this action and served upon this office.
- <u>✓</u> (STATE) I declare under penalty of perjury that the foregoing is true and correct.

Executed this April 4, 2025, in Los Angeles County, California.

/s/ Steven B. Stevens

#### Service List

Chester E. Walls
1300 East Shaw Avenue
Suite 125
Fresno, California 93710
Telephone: (559) 221-2771
cew@litg-engr.com
Counsel for Defendants-Appellants

Suzanne M. Nicholson
Wilke Fleury LLP
621 Capitol Mall, Suite 900
Sacramento, California 95814
Telephone: (916) 441-2430
snicholson@wilkefleury.com
Counsel for Defendants-Appellants

John F. Denove (SBN 68825) Alicia S. Curran (SBN 187872) firm@cdrbh.com Cheong & Denove 149 South Barrington Avenue, #809 Los Angeles, California 90049 Tele: 310 277 4857; Fax 310 277 5254 Attorneys for Plaintiffs-Respondents Rachel Fear, Sarah Fear, Steven Fear

Jaqueline Frederick (SBN 93937)
jacqueline@redericklaw.net
FREDERICK LAW FIRM, A LAW CORP.
267 West Tefft Street
Nipomo, CA 93444
Tele: 805 929 1120; Fax: 805 929 4810
Attorneys for Plaintiff and Respondent
Diane E. McKenna, as Trustee of the
Long Family Trust dated January 29, 2022,
Successor to Betty Long