

1 Thomas B. Mayhew (State Bar No. 183539)
tmayhew@fbm.com
2 Alex Reese (State Bar No. 280530)
areese@fbm.com
3 Tim Horgan-Kobelski (State Bar No. 319771)
tkobelski@fbm.com
4 Jennifer M. Bentley (State Bar No. 329438)
jbentley@fbm.com
5 Douglas A. Lewis (State Bar No. 357641)
dlewis@fbm.com
6 Farella Braun + Martel LLP
One Bush Street, Suite 900
7 San Francisco, California 94104
Telephone: (415) 954-4400
8 Facsimile: (415) 954-4480

9 Robert Sinclair (State Bar No. 79193)
rsinclair@swbclaw.com
10 Sinclair, Wilson, Baldo & Chamberlain
2390 Professional Drive
11 Roseville, California 95661
Telephone: (916) 783-5281
12 Facsimile: (916) 783-5232

13 Attorneys for Defendant THE GATHERING INN
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15 SUPERIOR COURT OF THE STATE OF CALIFORNIA
16 COUNTY OF PLACER
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18 CITY OF LINCOLN, a California municipal
corporation, CITY OF LINCOLN, by and for
19 the People of the State of California,

20 Petitioners and Plaintiffs,

21 vs.

22 THE GATHERING INN, a California public
benefit non-profit corporation; CALIFORNIA
23 DEPARTMENT OF SOCIAL SERVICES, a
California state agency, HORNE LLP, a
24 Delaware limited liability partnership, and
DOES 1 through 15 inclusive,

25 Respondents and Defendants.
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Case No. S-CV-0053711

**DECLARATION OF THOMAS B.
MAYHEW IN SUPPORT OF THE
GATHERING INN'S NOTICE OF
DEMURRER AND DEMURRER TO CITY
OF LINCOLN'S SECOND AMENDED
COMPLAINT**

Date: October 7, 2025
Time: 8:30 a.m.
Dept.: 42
Judge: The Hon. Trisha J. Hirashima

Action Filed: September 30, 2024
Trial Date: Not yet set

1 I, Thomas B. Mayhew, declare as follows:

2 1. I am an attorney licensed to practice law in the State of California and a partner at
3 the law firm of Farella Braun + Martel LLP, attorneys for The Gathering Inn (“TGI”).

4 2. I have personal knowledge of the matters addressed in this declaration. If I were
5 called and sworn as a witness, I could and would competently testify to the facts set forth below.

6 3. In compliance with California Code of Civil Procedure § 430.41, counsel for TGI
7 met and conferred via videoconference with counsel for the City of Lincoln regarding the grounds
8 for TGI’s demurrer on August 14, 2025. The parties were unable to reach an agreement that
9 would resolve TGI’s objections raised in the demurrer.


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

12 Executed on this 26th day of August, 2025, at New York, New York.

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Thomas B. Mayhew

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