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8 Attorneys for Defendant THE GATHERING INN

10 SUPERIOR COURT OF THE STATE OF CALIFORNIA

11 COUNTY OF PLACER

13 CITY OF LINCOLN, a California municipal  
14 corporation, CITY OF LINCOLN, by and for  
the People of the State of California,

15 Petitioners and Plaintiffs,

16 vs.

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

21 Respondents and Defendants.

Case No. S-CV-0053711

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

Date: February 11, 2025

Time: 8:30 a.m.

Dept.: 42

Judge: The Hon. Trisha J. Hirashima

Action Filed: September 30, 2024

Trial Date: Not yet set

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

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


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

28 45887/20037461.1

3. In compliance with California Code of Civil Procedure § 430.41, counsel for all parties in this case met and conferred via videoconference regarding the grounds for TGI's demurrer on November 14, 2024 and December 19, 2024. The parties were unable to reach an agreement that would resolve TGI's objections raised in the demurrer.

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

Executed on this 20th day of December, 2024, at San Francisco, California.

  
Thomas B. Mayhew