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14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA
15 FOR THE COUNTY OF LOS ANGELES**

16 FIBER FIRST LOS ANGELES, MOTHERS OF
17 EAST LA, UNION BINACIONAL DE
18 ORGANIZACIONES DE TRABAJADORES
19 MEXICANOS EXBRACEROS 1942-1964,
20 BOYLE HEIGHTS COMMUNITY PARTNERS,
21 UNITED KEETOWAH BAND OF
22 CHEROKEE INDIANS IN OKLAHOMA,
23 CALIFORNIA FIRES & FIREFIGHTERS,
24 MALIBU FOR SAFE TECH, EMF SAFETY
25 NETWORK, CALIFORNIANS FOR SAFE
TECHNOLOGY, 5G FREE CALIFORNIA, and
CHILDREN'S HEALTH DEFENSE,

26 Petitioners and Plaintiffs,

27 v.

28 COUNTY OF LOS ANGELES, COUNTY OF
LOS ANGELES BOARD OF SUPERVISORS,
COUNTY OF LOS ANGELES REGIONAL
PLANNING COMMISSION, COUNTY OF LOS
ANGELES DEPARTMENT OF REGIONAL
PLANNING, COUNTY OF LOS ANGELES
DEPARTMENT OF PUBLIC WORKS, and
DOES 1-10, inclusive,

Defendants, Respondents, and Real
Parties in Interest.

Case No. 23STCP00750

**NOTICE OF TENTATIVE SETTLEMENT
AGREEMENT, AND STIPULATION TO
CONTINUE OSC RE JUDGMENT;
[PROPOSED] ORDER**

Date: December 11, 2025
Time: 9:30 a.m.
Dept.: 85

Action Filed: March 7, 2023

Assigned for all purposes to the Honorable James
C. Chalfant, Department 85

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**NOTICE OF TENTATIVE SETTLEMENT AGREEMENT,
AND STIPULATION TO CONTINUE OSC RE JUDGMENT**

Plaintiffs and Petitioners Fiber First Los Angeles; Mothers of East LA; Union Binacional De Organizaciones De Trabajadores Mexicanos Exbraceros 1942-1964; Boyle Heights Community Partners; United Keetoowah Band of Cherokee Indians in Oklahoma; California Fires & Firefighters; Malibu For Safe Tech; EMF Safety Network; Californians for Safe Technology; 5G Free California; and Children’s Health Defense (collectively “Petitioners”) and Defendants, Respondents, and Real Parties in Interest County of Los Angeles; County of Los Angeles Board of Supervisors; County of Los Angeles Regional Planning Commission; County of Los Angeles Department of Regional Planning; and County of Los Angeles Department of Public Works (collectively the “County”) (Petitioners and the County collectively, the “Parties”) hereby acknowledge and agree as follows:

RECITALS

WHEREAS, on November 2, 2023, Petitioners filed a First Amended Verified Petition for Writ of Mandate and Complaint for Declaratory and Injunctive Relief (“FAP”) against the County alleging violations of the California Environmental Quality Act (“CEQA”), among other things, in connection with the County’s adoption of Ordinance No. 2023-0001, concerning the permitting of certain wireless facilities in specified unincorporated areas of the County (the “Ordinance”); and

WHEREAS, on March 21, 2024, the Court held a hearing on the merits of Petitioners' CEQA claims and took the matter under submission; and

WHEREAS, on March 27, 2024, the Court issued a Minute Order, which provided: "The FAP is granted in limited part in that the historical resources and scenic highways exceptions apply to the Ordinance. In all other respects, the FAP is denied;" and

WHEREAS, the Court's March 27, 2024 Minute Order further provided: "The parties are ordered to meet and confer on the appropriate remedy. If they fail to agree, each side may file a three-page brief on the appropriate remedy two court days before May 7," and the Minute Order further scheduled an Order to Show Cause ("OSC") re Judgment for May 7, 2024; and

WHEREAS, on April 30, 2024, Petitioners moved ex parte to continue the OSC re Judgment until after the Court had opportunity to consider Petitioners' Motion to Vacate the Judgment/Order, and

1 at the May 1, 2024 hearing on Petitioners' ex parte application, the Court continued the May 7, 2024
2 OSC re Judgment to June 13, 2024 and continued the deadline to file the three-page brief relating to
3 remedy to June 10, 2024; and

4 WHEREAS, on May 28, 2024, at the hearing on Petitioners' Motion for New Trial (which
5 Motion the Court denied), the Parties advised the Court that they may seek to file a stipulation and order
6 to continue the June 13, 2024 OSC re Judgment, as memorialized in the Court's May 28, 2024 Minute
7 Order; and

8 WHEREAS, on June 5, 2024, Petitioners and the County submitted a stipulation and proposed
9 order to continue the June 13, 2024 OSC re Judgment to June 25, 2024 to allow for settlement
10 discussions; and

11 WHEREAS, on June 17, July 26, September 23, and November 5, 2024, and on January 3, 2025,
12 February 18, 2025, April 14, 2025, May 13, 2025, July 24, 2025, and October 23, 2025, Petitioners
13 and/or the County submitted additional stipulations and proposed orders to further continue the OSC re
14 Judgment to allow for additional meet and confer efforts and settlement discussions; and

15 WHEREAS, on December 1, 2025 – after lengthy, complex, and complicated negotiations with
16 multiple parties in the action – the Parties¹ have now reached a Tentative Settlement Agreement; and

17 WHEREAS, to become final, the Tentative Settlement Agreement needs to be formally reviewed
18 and approved by the Los Angeles County Board of Supervisors; and

19 WHEREAS, the Parties agree that additional time is needed to go through the required process to
20 have Respondent Los Angeles County Board of Supervisors formally review and approve such
21 settlement, which in the Parties' best estimate may require approximately another five (5) months; and

22 WHEREAS, the Parties therefore stipulate that a further continuance of five (5) months would be
23 in the interests of justice to allow Respondent Los Angeles County Board of Supervisors ample time to
24 formally approve the settlement, and that such continuance would cause no prejudice to any Party; and

25
26
27 ¹ EMF Safety Network and Californians for Safe Technology are not parties to the Tentative Settlement
28 Agreement because on October 6, 2025, Petitioners informed the County that EMF Safety Network and
Californians for Safe Technology had dissolved. On December 2, 2025, Petitioners' counsel filed and
served Requests for Dismissal of both EMF Safety Network and Californians for Safe Technology from
the litigation with prejudice.

1 WHEREAS, the Parties stipulate and seek that the current date of the OSC re judgment be
2 continued for five months to May 7, 2026 or any other date thereafter at the convenience of the Court;

3 NOW, THEREFORE, THE PARTIES AGREE AND STIPULATE AS FOLLOWS:

4 1. The Parties respectfully request that the December 11, 2025 OSC re Judgment be
5 continued to May 7, 2026, or as soon thereafter as is convenient for the Court.

6 2. The Parties respectfully request that the deadline for the Parties to file their respective
7 three-page briefs concerning the appropriate remedy be continued to three court days before the
8 continued OSC re Judgment (i.e., May 1, 2026, if the OSC re Judgment is continued to May 7, 2026).

9
10 **IT IS SO STIPULATED.**

11 Dated: December 4, 2025

12 MITCHELL M. TSAI LAW FIRM

13
14 By: 

15 MITCHELL M. TSAI
16 NAIRA SOGHBATYAN
17 GRACE M. HOLBROOK

18 Attorneys for Plaintiffs and Petitioners
19 FIBER FIRST LOS ANGELES; MOTHERS
20 OF EAST LA; UNION BINACIONAL DE
21 ORGANIZACIONES DE TRABAJADORES
22 MEXICANOS EXBRACEROS 1942-1964;
23 BOYLE HEIGHTS COMMUNITY
24 PARTNERS; UNITED KEETOWAH
25 BAND OF CHEROKEE INDIANS IN
OKLAHOMA; CALIFORNIA FIRES &
FIREFIGHTERS; MALIBU FOR SAFE
TECH; EMF SAFETY NETWORK;
CALIFORNIANS FOR SAFE
TECHNOLOGY; 5G FREE CALIFORNIA;
and CHILDREN'S HEALTH DEFENSE

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Dated: December 4, 2025

BEST BEST & KRIEGER LLP

By: /s/ Gail A. Karish

ALISHA M. WINTERSWYK

*GAIL A. KARISH

PATRICIA URSEA

Attorneys for Defendants and Respondents

COUNTY OF LOS ANGELES, COUNTY

OF LOS ANGELES BOARD OF

SUPERVISORS, COUNTY OF LOS

ANGELES REGIONAL PLANNING

COMMISSION, COUNTY OF LOS

ANGELES DEPARTMENT OF REGIONAL

PLANNING and LOS ANGELES

DEPARTMENT OF PUBLIC WORKS

[PROPOSED] ORDER

The Court, having considered the stipulation of the Parties and good cause appearing therefore, in light of the Tentative Settlement Agreement, orders as follows:

1. The OSC re Judgment currently scheduled for December 11, 2025 at 9:30 a.m. is hereby continued to _____.

2. The deadline for the Parties to file a three-page brief on the appropriate remedy shall be continued to three court days before the continued OSC re Judgment.

IT IS SO ORDERED.

Dated: _____

HONORABLE JAMES C. CHALFANT
JUDGE OF THE SUPERIOR COURT

PROOF OF SERVICE

I, Hind Baki, declare that:

I am a citizen of the United States and work in Los Angeles County, California. I am over the age of 18 years and am not a party to the within entitled action. My business address is 139 South Hudson Avenue, Suite 200, Pasadena, California 91101. I served this list of persons with the following document on December 4, 2025:

**NOTICE OF TENTATIVE SETTLEMENT AGREEMENT, AND STIPULATION TO
CONTINUE OSC RE JUDGMENT; [PROPOSED] ORDER**

The document was served on:

Roland Trinh
Office of the County Counsel
500 West Temple Street #648
Los Angeles, CA 90012
Em: rtrinh@counsel.lacounty.gov

Gail Karish
Alisha Winterswyk
Patricia Ursea
Best Best & Krieger LLP
18101 Von Karman Avenue, Suite 1000
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Em: alisha.winterswyk@bbklaw.com
Em: patricia.ursea@bbklaw.com

X by electronic service, via either electronic transmission or notification consistent with California Code of Civil Procedure 1010.6.

I declare under penalty of perjury, according to the laws of the State of California, that the foregoing is true and correct. Executed on December 4, 2025, in Pasadena, California.

/s/ *Hind Baki*

Hind Baki