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People of the State of California

*Exempt from filing fees pursuant to
Government Code section 6103*

FILED
Superior Court of California
County of Los Angeles
11/06/2024

David W. Slayton, Executive Officer / Clerk of Court
By: S. Luqueno Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

THE PEOPLE OF THE STATE OF CALIFORNIA,

Plaintiff,

v.

THE CITY OF BEVERLY HILLS,

Defendant.

Case No. 24STCV28644

STIPULATION FOR ENTRY OF FINAL JUDGMENT

Department: 32
Judge: Hon. Daniel S. Murphy

1 Plaintiff, the People of the State of California (“Plaintiff” or “the People”), acting by and
2 through Rob Bonta, Attorney General of the State of California, and Defendant the City of
3 Beverly Hills (“City” or “Defendant”), hereby stipulate as follows:

4 1. The final Stipulated Judgment (“Judgment”), a true and correct copy of which is
5 attached to this Stipulation for Entry of Final Judgment (“Stipulation”) as Exhibit 1, may be
6 entered in this matter.

7 2. Concurrently with the filing of this Stipulation, the People have filed its Complaint
8 in this matter pursuant to the California Constitution, Article I, Sections 1 and 1.1 and Health and
9 Safety Code Section 123460, et seq.

10 3. The terms of this Stipulation shall be governed by the laws of the State of
11 California.

12 4. The City consents to the jurisdiction of this Court solely for purposes of entry and
13 enforcement of this Stipulation and Judgment.

14 5. Upon the City’s consent solely for purposes of entry and enforcement of this
15 Stipulation and Judgment, this Court has jurisdiction over the subject matter hereof and over the
16 People and the City (together, “the Parties”), and venue is proper in this court.

17 6. The Parties have agreed to resolve the allegations contained in the People’s
18 Complaint by entering into this Stipulation.

19 7. The Parties have stipulated and consented to the entry of the Judgment without the
20 taking of proof and without trial or adjudication of any fact or law herein. The City enters into
21 this stipulation solely for the purpose of resolving the People’s investigation. The Parties agree
22 that the execution of the Judgment is done solely for the purposes of compromise, and to
23 eliminate the burden and expense of further litigation, and does not constitute, and shall not be
24 construed as, an admission of liability. The Parties further agree that the Judgment shall not be
25 used for any purpose in any litigation.¹ No part of the Judgment, including its statements and
26

27 _____
28 ¹ This document and its contents are not intended for use by any third party for any
purpose, including submission to any court for any purpose.

1 commitments, shall constitute evidence or admission of any liability, fault, or wrongdoing by the
2 City.

3 8. The Judgment may be entered by any judge of the Los Angeles County Superior
4 Court.

5 9. The Attorney General may submit the Judgment to any judge of the Los Angeles
6 County Superior Court for approval and signature, based on this Stipulation, during the court's ex
7 parte calendar or on any other ex parte basis, without notice to or any appearance by the City,
8 which notice and right to appear the City hereby waives.

9 10. The Parties hereby waive their right to move for a new trial or otherwise seek to
10 set aside the Judgment through any collateral attack, and further waive their right to appeal from
11 the Judgment, except that the People and the City each agree that the Court shall retain
12 jurisdiction for the purposes specified in the paragraphs 36, 45, and 47 of the Judgment.

13 11. The City will accept notice of entry of judgment entered in this action by delivery
14 of such notice to its counsel of record and agrees that service of notice of entry of judgment will
15 be deemed personal service upon it for all purposes.

16 12. The individuals signing below represent that they have been authorized by the
17 parties they represent to sign this Stipulation.

18 13. This Stipulation may be executed in counterparts, and a facsimile or .pdf signature
19 shall be deemed to be, and shall have, the same force and effect as an original signature.
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FOR PLAINTIFF:

Dated: _____, 2024


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Attorney General of California
NELI PALMA
Senior Assistant Attorney General
KARLI EISENBERG
NATALIE TORRES
Supervising Deputy Attorneys General

ERICA CONNOLLY
Deputy Attorney General
Attorneys for the People of the State of California

FOR DEFENDANT:

The City of Beverly Hills

Dated: Oct 30, 2024

By: 
Laurence S. Wiener
City Attorney
City of Beverly Hills

Approved as to form:

Dated: _____, 2024

By: _____
Daniel R. Suvor
Lauren Kaplan
O'Melveny & Myers LLP
Attorneys for the City of Beverly Hills

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FOR PLAINTIFF:

Dated: October 30, 2024

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Senior Assistant Attorney General
KARLI EISENBERG
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/s/Erica Connolly
ERICA CONNOLLY
Deputy Attorney General
Attorneys for the People of the State of California

FOR DEFENDANT:

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