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**[EXEMPT FROM FILING FEES -  
Pursuant to Government Code  
Section 6103]**

8 *Attorneys for the People of the State of California and*  
9 *California Department of Housing and Community*  
10 *Development*

11 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA  
12 COUNTY OF ORANGE  
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15 PEOPLE OF THE STATE OF CALIFORNIA,  
16 and CALIFORNIA DEPARTMENT OF  
HOUSING AND COMMUNITY  
17 DEVELOPMENT,

18 Plaintiffs,

19 v.

20 CITY OF ANAHEIM and CITY COUNCIL OF  
21 ANAHEIM,

22 Defendant.  
23  
24  
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Case No.

**STIPULATION FOR ENTRY OF  
JUDGMENT**

(Code of Civ. Proc., § 664.6)

1 Plaintiffs, the People of the State of California, acting by and through ROB BONTA,  
2 Attorney General of the State of California, and the CALIFORNIA DEPARTMENT OF  
3 HOUSING AND COMMUNITY DEVELOPMENT, and Defendants CITY OF ANAHEIM and  
4 CITY COUNCIL OF ANAHEIM, hereby stipulate as follows:

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

8 2. Concurrently with the filing of this Stipulation, Plaintiffs filed its Complaint in this  
9 matter.

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

11 4. All parties in this matter agree that this Court has jurisdiction over the subject matter  
12 hereof, and over the parties themselves, and that venue is proper before this Court.

13 5. The parties have agreed to resolve the allegations contained in Plaintiffs’ complaint  
14 by entering into this Stipulation.

15 6. Defendants CITY OF ANAHEIM and CITY COUNCIL OF ANAHEIM (“the City”)  
16 consent to the jurisdiction of this Court solely for purposes of entry and enforcement of this  
17 Stipulation and Judgment.

18 7. The parties have stipulated and consented to the entry of the Judgment without the  
19 taking of proof and without trial or adjudication of any fact or law herein, without the Judgment  
20 constituting evidence, a finding, or an adjudication of any facts, claims, or issues of law as  
21 alleged in the Complaint on file herein, and without Defendant admitting any liability regarding  
22 allegations of violations that allegedly occurred prior to the entry of Judgment.

23 8. The Judgment may be entered by any judge of Superior Court of California, County  
24 of Orange.

25 9. The Attorney General may submit the Judgment to any judge of the Orange County  
26 Superior Court for approval and signature, based on this Stipulation, during the court’s ex parte  
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1 calendar or on any other ex parte basis, without notice to or any appearance by the City, which  
2 notice and right to appear the City hereby waives.

3 10. The parties hereby waive their right to move for a new trial or otherwise seek to set  
4 aside the Judgment through any collateral attack, and further waive their right to appeal from the  
5 Judgment, except that the parties agree that the court shall retain jurisdiction for the purposes of  
6 enforcing the terms of the Judgment.

7 11. The City will accept notice of entry of judgment entered in this action by delivery of  
8 such notice to its counsel of record, and agree that service of notice of entry of judgment will be  
9 deemed personal service upon it for all purposes regardless of the manner in which it is delivered.

10 12. The individuals signing this Stipulation represent that they have been authorized by  
11 the parties they represent to sign this Stipulation.

12 13. The Stipulation and Judgment may be executed in counterparts, and a facsimile or  
13 .pdf signature shall be deemed to be, and shall have the same force and effect as, an original  
14 signature.

15 FOR PLAINTIFFS:

16 Dated: April 26, 2022

Respectfully Submitted,

17 ROB BONTA  
18 Attorney General of California  
19 DANIEL A. OLIVAS  
Special Assistant Attorney General

20 *David Pai*

21 DAVID PAI  
22 Supervising Deputy Attorney General  
23 *Attorneys for the People of the State of*  
*California and the California Department*  
*of Housing and Community Development*

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California Department of Housing and  
Community Development



MEGAN KIRKEBY  
Deputy Director, Housing Policy  
Development of the California Department  
of Housing and Community Development



RYAN SEELEY  
Deputy Director and General Counsel of the  
California Department of Housing and  
Community Development

FOR DEFENDANTS:

Dated: April \_\_, 2022

Respectfully Submitted,

CITY OF ANAHEIM AND CITY COUNCIL OF  
ANAHEIM

ROBERT FABELA  
City Attorney of Anaheim