

## EXHIBIT A

### SETTLEMENTS OVER \$50,000 FINALIZED IN THE THIRD QUARTER OF 2020

Case Name	Date Settled	Amount	Description	Notes
<i>Marqus Martinez, Michaela Staggs, Jacob Beckman, Dani Burlison, and Kimberly Barbosa Soeiro on behalf of themselves and other similarly situated individuals, v. City of Santa Rosa, Rainer "Ray" Navarro, Michael Paetzold, Nick Vercelli, Justin McLean, Cameron Erion, and Does 1-50</i>	4/27/2021	\$1.9M	Plaintiffs allege injuries by police during protests in late May and early June, 2020	Approval of final settlement agreement and dismissal of action is pending.
<i>Terracon Constructors, Inc. (Claim)</i>	1/12/2021	\$65,179.71	Allegation of Breach of Contract arising out of public works construction project - Post Court and Simpson Place Sewer Replacement - Contract No. C002081	Claim filed 6/18/2020. Agreement approves and pays change order.

## EXHIBIT B

### LITIGATION AS OF MAY 14, 2021

Full Case Name	Court/Case No.	Date Served	Amount Claimed	Category	Type of Action/ Comments	STATUS	SETTLED OR DISMISSED DATE
<i>People of the State of CA; City of Santa Rosa v. Deborah J. O'Connor, as Trustee of the O'Connor Irrevocable Trust</i>	SCV-264904	8/5/2019	Receivership	Code Enforcement/ Receivership	Complaint and Petition for injunctive Relief, Abatement of Nuisance, Appointment of Receiver and other equitable relief	Active - Pleadings. Receiver has been appointed. Litigation is ongoing	
<i>People of the State of CA: City of Santa Rosa v. Davis Properties, a general partnership, American Savings Bank, F.A., the Testate and Intestate Successors of Mervyn C. Diehl, deceased, and all persons claiming by, through, or under such decedent any legal or equitable right, title, estate, lien, or interest in real property commonly known as 116 South E Street, Santa Rosa, and Does 1-10</i>	SCV-265933	1/29/2020	Receivership	Code Enforcement/ Receivership	Complaint and Petition for injunctive Relief, Abatement of Nuisance, Appointment of Receiver and other equitable relief. Lead based paint throughout home caused lead poisoning in a child. Home has been abandoned since that time, with the exception of occasional transients.	Active - Pleadings - Receiver has been appointed and plan for rehabilitation has been approved by the Court and County Environmental Services.	
<i>People of the State of California, City of Santa Rosa v. The Testate and Interstate Successors of David L. Mosher and Rosemary Mosher, Deceased, and all persons Claiming by, through, or under such Decedents any Legal or Equitable Right, Title, Estate, Lien, Interest in Real Property Commonly Known as 3073 Lamberson Court, and DOES 1-25</i>	MCV-252325	2/19/2020	Receivership	Code Enforcement/ Receivership	Complaint and Petition for injunctive Relief, Abatement of Nuisance, Appointment of Receiver and other equitable relief	Active - Pleadings	
<i>People of the State of California, City of Santa Rosa v. Norma Cronin and DOES 1-10</i>	SCV-267223	10/13/2020	Receivership	Code Enforcement/ Receivership	Complaint and Petition for injunctive Relief, Abatement of Nuisance, Appointment of Receiver and other equitable relief	Dismissed without prejudice 4/19/2021	Dismissed - 4/19/2021
<i>Fountaingrove II Open Space Maintenance Association v. City of Santa Rosa and DOES 1-10, inclusive</i>	SCV-266455	6/16/2020	\$35,000	Other (Nuisance and other claims)	Complaint for damages for nuisance, inverse condemnation, and dangerous condition of public property relating to contaminated water pipes	Settled on 1/25/2021 for \$15,000	Dismissed 02/22/2021

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Full Case Name	Court/Case No.	Date Served	Amount Claimed	Category	Type of Action/ Comments	STATUS	SETTLED OR DISMISSED DATE
<i>Bay Cities Paving &amp; Grading, Inc., a California corporation v. City of Santa Rosa, a body politic, and Does 1-50</i>	SCV-265333	10/15/2019	TBD	Other (Breach of Contract)	Allegation of Breach of Contract arising out of public works construction project	Active - Discovery	
<i>Terracon Constructors, Inc., a California corporation v. City of Santa Rosa, a charter city; and DOES 1-50 fictitiously named parties</i>	SCV-266987	8/31/2020	\$688,035.00	Other (Breach of Contract)	Allegation of Breach of Contract arising out of public works construction project	Active - Discovery has commenced; Trial set for 11/5/2021	
<i>William P. Gallaher, an individual v City of Santa Rosa, City Council of the City of Santa Rosa, and DOES 1 through 25, inclusive</i>	SCV-265711	12/23/2019	TBD	Other (CEQA)	Petition for Writ of Mandate – CEQA (challenge to the City’s All Electric Reach Code)	Active - On April 23, 2021, Court entered Ruling on Petition for Writ of Mandate in favor of City, upholding the City’s All Electric Reach Ordinance in full	Final Order for Judgment in favor of the City is pending. Dismissal will be filed at that time
<i>Airport Business Center, a California limited partnership, and Blue Fox Partners, A California general partnership v. City of Santa Rosa, City Council of the City of Santa Rosa, and DOES 1 through 25, inclusive</i>	SCV-267372	11/12/2020	TBD	Other (CEQA)	Petition for Writ of Mandate – CEQA (challenge to the City’s Downtown Station Area Specific Plan)	Active - Pleadings; Case Management Conference scheduled for 5/20/2021	

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Full Case Name	Court/Case No.	Date Served	Amount Claimed	Category	Type of Action/ Comments	STATUS	SETTLED OR DISMISSED DATE
<i>County of Sonoma, a political subdivision of the State of California; Sonoma County Agricultural Preservation and Open Space District, a Public Agency; Sonoma County Water Agency, a public agency of the State of California; Sonoma County Community Development Commission, a public agency; City of Cloverdale, a municipal corporation; City of Healdsburg, a municipality organized under the laws of the State of California; Town of Windsor, a municipal corporation; and City of Santa Rosa, a municipal corporation v. Pacific Gas and Electric Company, a California Corporation; PG&amp;E Corporation, a California Corporation; and DOES 1-100, Inclusive</i>	SCV-267391 (Sonoma Superior Court) Pending Case # (San Francisco Superior Court)	N/A	TBD	Other (City Action for Recovery of Fire Damages )	City as Plaintiff. Complaint for recovery of damages related to Kincade Fire	Active - Pleadings; Complaint filed on 11/17/2020; case transferred to San Francisco Superior Court (pending case number and assignment); Mediation held April 22-23, 2021.	
<i>William David Bush v. Brown Farm, City of Santa Rosa Does 1-20</i>	20-cv-03275-JD	5/19/2020	TBD	Other (Clean Water Act)	Allegation of violation of Clean Water Act	Dismissed without Prejudice and Case Closed by Order of the Court	Dismissed - 3/22/2021
<i>Nicholle Vannucci, Ellen Brown, and Shannon Hall, individuals; and Homeless Action!, an unincorporated association v. County of Sonoma, Sonoma County Community Development Commission, City of Santa Rosa, and Does I to XX</i>	3:18-CV-01955-VC	4/2/2018	TBD	Other (Constitutional and ADA Claims)	Complaint for Declaratory Relief and Injunctive Relief (homeless encampments)	Active - Preliminary Injunction entered; litigation stayed from 8/12/2019 through 6/30/2021	
<i>Sonoma Citizens for Transparency in Government v City of Santa Rosa, County of Sonoma</i>	SCV-264359	2/24/2020	TBD	Other (PRA)	Allegation that plaintiffs were wrongfully denied access to requested records under PRA.	Active - Pleadings; Case Management Conference set for 6/8/2021	

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<i>Ronald Austin v City of Santa Rosa; and DOES 1 through 10, inclusive</i>	SCV-267183	10/6/2020		Other (PRA)	Allegation of Public Records Act violations	Dismissed with prejudice on 12/21/2020	Dismissed - 12/21/2020
<i>Bonnie Kessner, et al. v. City of Santa Clara, et al. (City of Santa Rosa - Linda Johnson &amp; Robert Reynoso)</i>	20-CV364054	3/4/2020	TBD	Other (Prop 218 - Water Rates)	Complaint for damages and equitable relief: Petition for Writ of Mandate under Prop 218, challenging City's water rates	Active - Discovery stayed pending court decision on demurrers regarding venue, joinder, and jurisdiction and other defenses. Hearing on Demurrer scheduled for 5/20/2021	
<i>Rose Hernandez v Windi Braden, Chantel Medeiros, City of Santa Rosa, James Ritchie and DOES 1 to 25</i>	SCV-264519	1/8/2020	TBD	Other (Property Damage)	Plaintiff claims fire truck hit her parked rental car resulting in injury and damage to car	Notice of Settlement of Entire Case received; Dismissed 01/06/2021	Plaintiff settled the matter with other Defendants; City Dismissed on 1/6/2021 without cost
<i>New Cingular Wireless PCS, LLC, D/B/A/ AT&amp;T Mobility v. City of Santa Rosa, California</i>	4:20-cv-07921	11/18/2020	Unknown	Other (Telecom/Permitting)	Complaint for declaratory and injunctive relief for approval of five permits to place small cells on City streetlight poles in the public right-of-way	Dismissed without prejudice	Dismissed - 5/3/2021
<i>David Pelayo, Roberto Hernandez, Edmond Andre, Bryan Munoz, and Brian Medeiros, each as an individual, and on behalf of the general public for all those similarly situated v Utility Partners of America, LLC, a Delaware corporation; City of Santa Rosa and DOES 1 through 250, inclusive.</i>	SCV-264530	6/5/2019	TBD	Other (Wage Claim)	Alleged failure to pay prevailing wages, compensation, etc. for public works project	Active - Tendered to vendor for defense. Tender rejected by UPA. Discovery is ongoing. Mediation was unsuccessful. Court granted UPA's Motion for Summary Judgment versus City. City's Petition for Mandamus Writ filed 5/10/2021; Trial set for 01/28/2022	

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<i>James L. Duncan v Sonoma Marin Area Rail Transit District (Real party in Interest: City of Santa Rosa and County of Sonoma)</i>	SCV-266092	3/2/2020	N/A	Other (Writ)	Writ of Mandate and Complaint for Declaratory and Injunctive Relief relating to proposed Jennings Ave Crossing of SMART rail line. City is a Real Party in Interest and not a Defendant.	Active - Pleadings; Case Management Conference scheduled for 6/24/2021	
<i>Meyer, Tessala Dakota v. City of Santa Rosa, Does 1-20</i>	SCV-263791	1/25/2019	TBD	Personal Injury (Motorcycle Accident)	Claimant alleges SRPD officer negligent in operation of motorcycle which crashed into homeless tent	Active - Trial scheduled for 8/13/2021	
<i>Adrian Madrigal, a minor, through his guardian ad litem, Karissa Milazo v. City of Santa Rosa and DOES 1 through 20</i> ----- Cross-Complaint: <i>City of Santa Rosa vs. Debi Wagner and "CYO Basketball"</i>	SCV-263628	12/17/2018	TBD	Personal Injury/Dangerous Condition	Complaint for personal injury; General Negligence and Infliction of Emotional Distress due to injury at gym; City filed Cross-Complaint vs. Wagner for indemnity	Settled - \$30,000 on 01/20/2021	Dismissed 02/16/2021
<i>Jonathan Roope v City of Santa Rosa, and DOES 1 through 50</i>	SCV-264473	6/10/2019	TBD	Personal Injury/Dangerous Condition	Personal Injury -- Allegation that foot hit a steel bracket protruding from sidewalk and plaintiff fell causing injuries	Active - Discovery ongoing; expert discovery commencing; To date, settlement discussions have been unsuccessful; Trial set for 7/23/2021.	

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<i>Elizabeth Beck v County of Sonoma, et al</i>	SCV-265374	10/21/2019	TBD	Personal Injury/Dangerous Condition	Alleged trip and fall on a sidewalk	Active - Discovery ongoing; Case Management Conference set for 07/22/2021; Settlement offers from both defendants by way of CCP section 998 are pending. Trial not yet set	
<i>Megan Marlow v City of Santa Rosa, Chelino's Restaurant, DOES 1-50</i>	SCV-265050	11/18/2019	TBD	Personal Injury/Dangerous Condition	Alleged Personal Injury	Active - Discovery ongoing; Depositions being set. Trial set for 11/5/2021.	
<i>Mindy Streicher, an individual v City of Santa Rosa, Kaiden Kemp, an individual</i>	SCV-265071	12/13/2019	TBD	Personal Injury/Dangerous Condition	Allegation that Claimant suffered injuries during collision with police vehicle	Settled for \$22,000	Dismissed 1/20/2021
<i>Leopoldo Castilo Gomez, an individual v Thomas Carroll Hyland, an individual; Ghilotti Bros, Inc., a corporation; City of Santa Rosa, County of Sonoma, State of California DOES 1 through 50, inclusive</i>	SCV-265313	1/13/2020	\$2 mil	Personal Injury/Dangerous Condition	Claimant alleges that inadequate lighting and a rapid "walk to stop" traffic light contributed to being hit by a vehicle while walking in a crosswalk	Dismissed - City has negotiated dismissal in exchange for waiver of costs	Dismissed - 10/14/2020
<i>Lyzette Campos and Howard Hernandez v. City of Santa Rosa, Timothy Gooler, and DOES 1-20</i>	SCV-266721	7/16/2020	TBD	Personal Injury/Dangerous Condition	Plaintiffs suffered personal injuries and property damage allegedly caused by police negligence during motor vehicle accident	Active - Discovery; Plaintiffs' depositions are set for 5/27/2021; Trial Scheduled for 11/5/2021	
<i>Carolyn Teel v. State of California, CA Dept of Transportation, County of Sonoma, Sonoma County Animal Control, City of Santa Rosa, and DOES 1-20</i>	SCV-267033	9/9/2020	TBD	Personal Injury/Dangerous Condition	Plaintiffs suffered injuries by two dogs that they allege defendants should have known were dangerous	Active - Discovery	

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<i>John DeGroot v. City of Santa Rosa, and DOES 1 to 10, Inclusive</i>	SCV-266515	1/25/2021	TBD	Personal Injury/Dangerous Condition	Claimant stepped onto sidewalk from street, stumbled and fell causing injuries	Active - Discovery has commenced. Cross-Complaint to be filed upon determination of identity of adjacent business owner.	
<i>Lisa Brayson v. City of Santa Rosa; HIGHWAY 29 WINE AND BISTRO, INC. DEPARTRTMENT29, INC. and DOES 1 to 100</i>	SCV-267799	3/5/2021	TBD	Personal Injury/Dangerous Condition	Claimant alleges injury to left arm due to uneven sidewalk	Active - Discovery; Cross-Complaint filed by City against co-defendants	
<i>Robert Casey, an individual, v. City of Santa Rosa; and DOES 1-50, inclusive</i>	SCV-263628	1/14/2019	TBD	Police Action	Complaint for damages; Alleged excessive force	Active - Pleadings (Stayed pending outcome of Motion to Suppress - <i>Heck v. Humphrey</i> )	
<i>Debra Giambastiani v City of Santa Rosa Santa Rosa Chief of Police Robert Schreeder, Santa Rosa Officer Timothy Gooler, Santa Rosa Officer Tyler Laron, Santa Rosa Officer Christopher Mahurin, Santa Rosa Officer Kenneth Ferrigno, Santa Rosa employees DOES 1-25, County of Sonoma, Sonoma County Sheriff Mark Essick, Sonoma County employees DOES 26-50, Jointly and Severally</i>	3:19-cv-02450-VC	6/17/2019	According to Proof	Police Action	Alleged civil rights violation; malicious prosecution; false arrest and imprisonment; assault and battery; negligence; invasion of privacy; intentional infliction of emotional distress	Case stayed pending appeal of trial court ruling or motion to suppress in criminal case. Appeal is briefed and expected to be heard in June 2021	
<i>Marqus Martinez, Michaela Staggs, Jacob Beckman, Dani Burlison, and Kimberly Barbosa Soeiro on behalf of themselves and other similarly situated individuals, v. City of Santa Rosa, Rainer "Ray" Navarro, Michael Paetzold, Nick Vercelli, Justin McLean, Cameron Erion, and Does 1-50</i>	3:20-cv-04135	6/23/2020	Exceeds \$1 Million	Police Action	Plaintiffs allege injuries by police during protest	Settled on 4/27/2021 with all plaintiffs jointly for \$1.9 Million	Dismissal Pending

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<i>Ryland Stamey v. City of Santa Rosa, a municipal corporation, Sonoma County, a municipal corporation, and DOES 1-50, inclusive</i>	3:21-cv-00892	2/4/2021		Police Action	Complaint for injuries and civil rights violations by police during protests	Active - Discovery	
<i>Herman Tamrat v. The Santa Rosa Police Department; Robert L. Schreeder, Chief of Santa Rosa Police Department; Officer Erick Rhoades (#352); Officer Patrick Albini; sued in their individual and official capacities</i>	4:20-cv-01323	4/19/2021	TBD	Police Action	Claimant alleges violation of civil rights and excessive abuse	Active - Motion for Summary Judgment (FRCP 56) being filed by Defendants	
<i>United States, et al., ex rel. John Hendrix v. J-M Manufacturing Company, Inc., et al.</i>	ED CV06-0055-GW	N/A	TBD	Qui Tam	Federal qui tam action (and stayed state court action) filed against water pipe manufacturer for false claims	Active - The Court denied exemplar plaintiff damages; final judgment expected soon and likely appeal to the Ninth Circuit on multiple issues. City's claims (as non-exemplar plaintiff) are currently stayed	
<i>State of California, ex rel. Onthegowireless LLC v. Cellco Partnership, et al.</i>	Sacramento Superior Court Case No. 34-2012-00127517	N/A - City is Plaintiff in Intervention	Unknown	Qui Tam	Qui Tam action for excess phone charges	The Court approved the settlement; settlement funds are disbursed; and dismissal is expected in the short term, concluding the matter in its entirety	Settled; Dismissal pending
<i>Joseph Romano v. City of Santa Rosa</i>	MSC-190404	12/18/2019	\$10,000.00	Small Claims	Claimant alleges that City refused to approve a building permit as required by State law	Dismissed without prejudice 1/6/2021	Dismissed 1/6/2021
<i>Amiral, Carson P v. City of Santa Rosa</i>	MSC-190847	9/15/2020	4/24/1902	Small Claims	Claimant alleges his vehicle was illegally towed from a private parking space.	Judgment entered in favor of Plaintiff Amiral - \$830	Judgment entered 04/28/2021

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Full Case Name	Court/Case No.	Date Served	Amount Claimed	Category	Type of Action/ Comments	STATUS	SETTLED OR DISMISSED DATE
<i>Anthony D. Eposti v. City of Santa Rosa</i>	MSC-190788	11/4/2020	Unknown	Small Claims	Claimant alleges the City unrightfully destroyed his boat and trailer	Judgment Entered in favor of City - 04/28/2021	Judgment in favor of City 04/28/2021

## EXHIBIT C

### NEW CLAIMS REFERRED TO THE CITY ATTORNEY'S OFFICE IN FOURTH QUARTER OF 2020 AND FIRST QUARTER OF 2021

Claimant Name	Date of Claim	Date of Incident	Claim Amount	Location	Description of Claim
Estate of Barragan, et al	10/9/2020	7/12/2020		Stony Point Rd. at Lazzini Ave, Santa Rosa	Claim alleges intersection was an unreasonably dangerous condition of public property causing fatal vehicle accident
Owens, Matthew	10/12/2020	8/20/2020	over \$25,000	Sebastopol Ave and Fresno Ave, Santa Rosa (near State Farm Insurance Agency)	Claimant's bicycle tire got caught on lip of sidewalk causing him to fall and sustain several injuries
Moore, Misty	10/26/2020	4/26/2020	over \$25,000	Intersection of 4th Street and Farmers Lane	Claimant states she was making a left turn on her bicycle from Farmers Lane when she was struck by an oncoming vehicle due to the traffic signals changing too quickly for the length of the intersection, causing injuries.
Aguilera, Juan	1/12/2021	7/12/2020	4/29/1961	2065 Banjo Drive, Santa Rosa	Claimant alleges injuries by police during arrest. Claimant is unrepresented and has demanded \$11,000.00.
McNutt, Robert	1/21/2021	7/21/2020	over \$25,000	3222 Airway Dr, Santa Rosa (inside parole office)	Claimant alleges wrongful accusation and arrest by SRPD. Also alleges that 1st District Court of Appeals improperly reversed order, thus revoking his parole.
Rosas, David C.	12/30/2020				Alleges false arrest and requests reimbursement of attorney's fees
Dixon, Kelly	2/1/2021	8/5/2020	over \$25,000	Doyle Park parking lot	Claimant alleges she sustained injuries when she fell on wet debris in parking lot

## EXHIBIT C

### NEW CLAIMS REFERRED TO THE CITY ATTORNEY'S OFFICE IN FOURTH QUARTER OF 2020 AND FIRST QUARTER OF 2021

Claimant Name	Date of Claim	Date of Incident	Claim Amount	Location	Description of Claim
Smith, Jason/Apogee Gardens, Inc.	1/29/2021	8/27/2020	over \$25,000	3009 Coffey Lane, Unit B, Santa Rosa	Claimants allege that business had to cease operations for a period of 7 days causing lost revenue, and was forced to relocate incurring moving costs due to Stop Work Notice imposed by Code Enforcement
Katharine Marshall Trust	3/4/2021	1/27/2021	\$64,000	1534 Bruce Court, Santa Rosa	SRPD is withholding property (money) belonging to Katharine Marshall Trust
French, Wendy D.	3/13/2021	10/17/2020	over \$25,000	1142 Orchard St, Santa Rosa, CA 95404	Claimant alleges they were falsely arrested.
Metellus-McLemore, Leocha	3/16/2021	9/16/2020	over \$25,000	3637 Sonoma Ave, Apt 112, Santa Rosa, CA 95405	Claimant alleges they suffered physical and emotional pain during arrest.
Clark, Jo	3/29/2021	9/30/2020	over \$25,000	4305 Llano Rd, Sebastopol, CA	Claimant alleges husband's (City of Santa Rosa Water employee) death was due to City's negligence by failing to shut power off to the water treatment plant.
Dionne, Rick & Jennifer	3/24/2021	March 2020	over \$25,000	2721 Hidden Valley	Claimant alleges City failed to properly inspect and deny approval for development plans causing damage to claimant's home and foundation