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By:  
Taylor Ramirez  
Deputy Clerk



6 Attorneys for Defendant John Meyer

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF MENDOCINO**

10 MENDOCINO RAILWAY, ) Unlimited  
11 Plaintiff, ) Case No. SCUJ-CVED 20-74939  
12 vs. )  
13 JOHN MEYER; REDWOOD EMPIRE ) DECLARATION OF STEPHEN F.  
TITLE COMPANY OF MENDOCINO ) JOHNSON IN SUPPORT OF  
14 COUNTY; SHEPPARD ) DEFENDANT JOHN MEYER'S  
INVESTMENTS; MARYELLEN ) REQUEST FOR REASONABLE TIME  
15 SHEPPARD; MENDOCINO COUNTY ) TO RESPOND TO EX PARTE  
TREASURER-TAX COLLECTOR; all ) APPLICATION FOR ORDER  
16 other persons unknown claiming an  
17 interest in the property; and DOES 1  
through 100, inclusive  
18 Defendants.

19  
20 I, Stephen F. Johnson declare  
21 I am qualified to practice law in the State of California, and am the attorney of  
22 record for defendant John Meyer.  
23 The following matters are of my own personal knowledge and if called to testify as  
24 a witness I can testify competently thereto:  
25 1. Defendant John Meyer ("Meyer") wishes to oppose the ex parte motion that  
26 was filed by plaintiff Mendocino Railway today. Meyer has respectfully requested that  
27 the court grant Meyer until Tuesday, September 26, 2023, to file a written response to

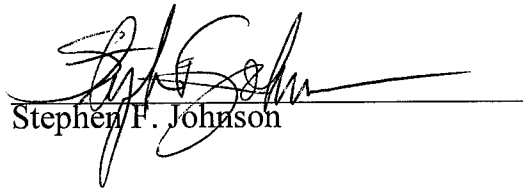
1 Mendocino Railway's ex parte motion. This declaration is filed in support of the Meyer's  
2 request.

3 2. I was served with the ex parte motion on September 20, 2023. I am requesting  
4 an extension of time on behalf of Meyer to file a response to the motion because I had  
5 numerous client appointments that were scheduled and occurred on September 20, 2021,  
6 and such appointments could not be vacated or rescheduled. The referenced  
7 appointments prevented me from preparing a timely response to the ex parte motion.

8 3. I have begun working on a response to the motion, but I am not going to be able  
9 to file the response today due to the complexity of the issues that need to be addressed  
10 and my pre-existing schedule. I have requested an extension of time until Tuesday,  
11 September 26, 2023, to file a response because I believe that such time is reasonably  
12 needed to adequately respond.

13 4. I represent on behalf of Meyer, and on behalf of myself, that we will not take  
14 any further action to collect on the judgment until the court is able to rule on the motion.

15 I declare under penalty of perjury that the foregoing is true and correct and that this  
16 document was executed on September 21, 2023, at Ukiah, California.

17  
18  
19   
20 Stephen F. Johnson

**PROOF OF SERVICE**

Mendocino County Superior Court Case No.: SCUK-CVED-20-74939

I declare that I am over the age of 18 years, employed in the County of Mendocino, and not a party to the within action; my business address is P.O. Box 419, 200 N. School Street, Room 304, Ukiah, CA 95482.

On September 21, 2023, I served the **DECLARATION OF STEPHEN F. JOHNSON IN SUPPORT OF DEFENDANT JOHN MEYER'S REQUEST FOR REASONABLE TIME TO RESPOND TO EX PARTE APPLICATION FOR ORDER** on the interested parties in this action by placing  the original  true copies thereof, as follows:

**SEE ATTACHED SERVICE LIST**

<input type="checkbox"/>	By E-SERVICE. Pursuant to California Rules of Court Rule 2.251(c), adopted effective July 1, 2013, I am e-Serving the above-listed document(s) to the electronic service address(es) on the attached Service List and e-Filing the document(s) using one of the court's approved electronic service providers. A true and correct copy of the e-Service transmittal will be attached to the above-listed document(s) and produced if requested by any interested party.
<input type="checkbox"/>	By MAIL. I am readily familiar with this law firm's practice for collection and processing of documents for mailing with the U. S. Postal Service. The above-listed document(s) will be deposited with the U. S. Postal Service on the same day shown on this affidavit, to the addressee(s) on the attached Service List in the ordinary course of business. I am the person who sealed and placed for collection and mailing the above-listed document(s) on this date at Ukiah, California, following ordinary business practices.
<input checked="" type="checkbox"/>	By E-MAIL. I e-mailed above-listed document(s) to the e-mail address(es) of the addressee(s) on the attached Service List. A true and correct copy of the e-mail transmittal will be attached to the above-listed document(s) and produced if requested by any interested party.
<input type="checkbox"/>	By OVERNIGHT DELIVERY. The above-listed document(s) will be deposited with an Overnight Delivery Service on the same day shown on this affidavit, in the ordinary course of business. I am the person who sealed and placed for collection and overnight delivery the above-listed document(s) on this date at Ukiah, California, to the addressee(s) on the attached Service List following ordinary business practices. A true and correct copy of the overnight delivery service transmittal will be attached to the above-listed document(s) and produced if requested by any interested party.
<input type="checkbox"/>	By PERSONAL SERVICE. I caused to have hand delivered, the above-listed document(s) to the parties indicated on the service list.
<input checked="" type="checkbox"/>	(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on September 21, 2023, at Ukiah, California.

  
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Karen Roman, Legal Assistant

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**SERVICE LIST**

Mendocino County Superior Court Case No.: SCUK-CVED-20-74939

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