

**NOTICE OF PENDENCY OF CLASS ACTION, PROPOSED SETTLEMENT,
INTERVENTION AND FINAL FAIRNESS HEARING DATE**

TO: ALL MEMBERS OF THE PUBLIC

TOM PAPPAS, et al., v. STATE COASTAL CONSERVANCY, et al., Santa Barbara
Superior Court Case # 1417388

YOU ARE HEREBY NOTIFIED that in the above-captioned action (Class Action), a settlement agreement (Settlement) with Defendants the California State Coastal Conservancy, the California Coastal Commission (collectively, State), and Rancho Cuarta (together with the State, Defendants) has been preliminarily approved by the Court and a settlement class (Settlement Class) has been certified. **YOUR RIGHTS MAY BE AFFECTED BY THE SETTLEMENT.**

YOU MAY OBTAIN A COPY OF THE SETTLEMENT from the Santa Barbara Superior Court, Records Department, 118 E. Figueroa St., Santa Barbara CA 93101.

SUMMARY OF THE CLASS ACTION: On 4/26/13, the California Coastal Commission recorded a Certificate of Acceptance (Certificate) as Santa Barbara County Instrument # 2013-0028299. In the Certificate of Acceptance, the State Coastal Conservancy accepts an Irrevocable Offer to Dedicate and Covenant Running with the Land (Offer to Dedicate) for various public access easements in and on the Hollister Ranch (Ranch). The Offer to Dedicate was recorded as Santa Barbara County Instrument # 82-17113. The Offer to Dedicate, a copy of which the State claims is attached to the Certificate, was executed by a former owner of Ranch Parcel 136. Each of the alleged access easements described in the Certificate burdens the property of the Plaintiffs and the Class. Neither the Plaintiffs nor the members of the Class consented to the recording of the Certificate.

The Class Action was initiated on 5/31/13. On or about 12/8/17, Plaintiff Hollister Ranch Owners' Association (HROA) and Defendants reached a settlement between themselves whereby HROA and Defendants entered into a Stipulation and Agreement of Settlement and a License Agreement (collectively, Prior Settlement). Pursuant to the Prior Settlement, the State has consented to the entry of a judgment quieting title, and will disavow, abandon, extinguish, cancel, and disclaim any right, title, or interest whatsoever in or to Ranch Parcels 1-136 associated with or described in the Offer to Dedicate or the Certificate. In exchange, the HROA has agreed to maintain in perpetuity and expand specified aspects of the Hollister Ranch Managed Access Program, and executed an irrevocable, limited license to the State for public passive recreational access over a certain area of Ranch Parcel 104, as described more fully in the Prior Settlement. **The Prior Settlement Agreement is final and is not the subject of this notice.**

SUMMARY OF THE SETTLEMENT: Through the Settlement, the Defendants have agreed to settle with the remaining Plaintiffs and to publicly disavow and disclaim any right, title, or interest whatsoever in or to any easements for public access or public recreation in, over, under, or through the Plaintiffs' properties, including but not limited to any easements for public access or public recreation, as described in the Offer to Dedicate and accepted in the Certificate, and to consent to the entry of a Judgment declaring that the Defendants have no right, title, or interest in Hollister Ranch as a result of the Offer to Dedicate or its acceptance. In exchange, Plaintiffs agree to release Defendants from certain claims that arise out of the Class Action and from

claims that arise out of or are based on the Prior Settlement, including the HROA's grant of the license and the Hollister Ranch Managed Access Program.

On 5/21/18, the Court granted preliminary approval of the Settlement. **A final fairness hearing regarding the Settlement will be held on 9/10/18 at 1:30pm**, before the Hon. Colleen Sterne, in Dept. 5 of the above-entitled Court located at 1100 Anacapa St., Santa Barbara, CA 93101.

IF YOU ARE A CLASS MEMBER AND WISH TO OBJECT TO THE TERMS OF THE SETTLEMENT, you must follow the instructions in the notice mailed to you.

IF YOU ARE A MEMBER OF THE PUBLIC AND WISH TO OBJECT TO THE TERMS OF THE SETTLEMENT, you must first obtain leave of Court to intervene in the Class Action. No objections may be made without Court leave to intervene. To seek leave, *you must file a Motion to Intervene with the Court pursuant to Code of Civil procedure section 387 and provide any substantive comments on the Settlement no later than 7/23/18*, and serve by mail to all addresses below:

Hollister & Brace, APC, Attn: Marcus Bird, 1126 Santa Barbara St., Santa Barbara, CA 93101

Brownstein Hyatt Farber Schreck, LLP, Attn: Beth Collins, 1020 State St., Santa Barbara, CA 93101

Office of the Attorney General, Attn: Jamee Jordan Patterson, 600 West Broadway, Ste. #1800, San Diego, CA 92101

Law Offices of Joseph Liebman, P.C., Attn: Joseph Liebman, 4250 Mariposa Dr., Santa Barbara, CA 93110

The parties to the Class Action may oppose any Motion to Intervene by 8/3/18, and all replies are due 8/10/18.

IF YOU ARE A CLASS MEMBER AND HAVE QUESTIONS, contact Hollister & Brace, APC, Attn: Marcus Bird (address above), Tel: 805-963-6711.

IF YOU ARE A MEMBER OF THE PUBLIC, you may retain counsel of your choice.

BY ORDER OF THE COURT