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SAN MATEO COUNTY

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**FILED**

By Superior Court of California, County of San Mateo  
ON 05/07/2025

By /s/ Berini, Anthony  
Deputy Clerk

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WINTER KING (State Bar No. 237958)  
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Attorneys for Respondent and Defendant  
CITY OF HALF MOON BAY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN MATEO**

JOHN VIDOVICH,  
  
Petitioner and Plaintiff,  
  
v.  
  
CITY OF HALF MOON BAY,  
  
Respondent and Defendant.

Case No. 24-CIV-08216  
NF  
**Stipulation and ~~Proposed~~ Order to Extend  
Deadline to Lodge Administrative Record**  
  
Assigned for All Purposes to:  
Hon. Nancy L. Fineman, Dept. 4  
  
Action Filed: December 23, 2024  
Trial Date: TBD

Respondent and Defendant City of Half Moon Bay (“City”) and Petitioner and Plaintiff John Vidovich (“Petitioner,” and collectively the “Parties”) stipulate as follows:

**RECITALS**

WHEREAS, Petitioner is the owner of real property located at 2800 Champs Elysee Boulevard, identified as San Mateo Assessor’s Parcel Number 048-133-060 (“Property”);

WHEREAS, on August 16, 2017, Petitioner submitted an application to the City requesting approval to construct a single-family residence on the Property (the “Project”), which application was denied by the City on September 10, 2024;

WHEREAS, on October 25, 2024, Petitioner requested that the City prepare an administrative record for the Project pursuant to Code of Civil Procedure 1094.6;

1 WHEREAS, on December 23, 2024, Petitioner filed a “Petition for Writ of Administrative  
2 Mandamus and Complaint for Damages and for Violations of Due Process, Equal Protection, and  
3 Takings,” challenging the City’s denial of the Project (“Petition”);

4 WHEREAS, on January 21, 2025, Petitioner served the Petition on the City;

5 WHEREAS, the deadline to lodge the administrative record is May 2, 2025;

6 WHEREAS, the Parties are engaged in settlement discussions to resolve the Petition; and

7 WHEREAS, the Parties wish to extend the deadline to lodge the administrative record to allow  
8 for further settlement discussions without incurring additional record preparation costs.

9 **STIPULATION**

10 NOW, THEREFORE, IT IS STIPULATED by and among the Parties that:

- 11 1. The City’s deadline for lodging the administrative record is extended to June 6, 2025.  
12

13 DATED: April 24, 2025

SHUTE, MIHALY & WEINBERGER LLP

14  
15 By:



16 CATHERINE C. ENGBERG  
17 WINTER KING  
18 VANEETA CHINTAMANENI  
NARDOS GIRMA

19 Attorneys for Respondent and Defendant  
20 CITY OF HALF MOON BAY

21 DATED: April 24, 2025

DESMOND, NOLAN, LIVAICH & CUNNINGHAM

22  
23 By:



24 KRISTEN RENFRO

25 Attorneys for Petitioner and Plaintiff  
26 JOHN VIDOVICH  
27  
28

1 **~~{Proposed}~~ Order**

2 Having read and considered the above Stipulation, and good cause appearing therefore, IT IS SO  
3 ORDERED.

4 Electronically

5 **SIGNED**

6 By /s/Fineman, Nancy

7 05/07/2025

8 DATED: \_\_\_\_\_

9 Nancy L. Fineman,  
10 Judge of the Superior Court

11 The court was unavailable to sign the proposed order before today. Defendant is not in  
12 default if it did not meet the original deadline.

13 NF

1 **PROOF OF SERVICE**

2 At the time of service, I was over 18 years of age and **not a party to this action**. I am  
3 employed in the County of San Francisco, State of California. My business address is 396  
4 Hayes Street, San Francisco, CA 94102.

5 On April 24, 2025, I served true copies of the following document(s) described as:

6 **STIPULATION AND [PROPOSED] ORDER TO EXTEND DEADLINE TO LODGE  
ADMINISTRATIVE RECORD**

7 on the parties in this action as follows:

8 KRISTEN RENFRO  
9 DESMOND, NOLAN, LIVAICH &  
CUNNINGHAM  
10 15<sup>th</sup> and S Building  
1830 15<sup>th</sup> Street  
11 Sacramento, CA 95811  
Tel: (916) 443-2051  
12 Fax: (916) 443-2651  
Email: [Krenfro@dnlc.net](mailto:Krenfro@dnlc.net)

Attorneys for Petitioner/Plaintiff  
John Vidovich

13 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** I caused a copy of the  
14 document(s) to be sent from e-mail address [jmiao@smwlaw.com](mailto:jmiao@smwlaw.com) to the person(s) at the e-mail  
15 address above. I did not receive, within a reasonable time after the transmission, any electronic  
message or other indication that the transmission was unsuccessful.

16 I declare under penalty of perjury under the laws of the State of California that the  
foregoing is true and correct.

17 Executed on April 24, 2025, at San Francisco, California.

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21 \_\_\_\_\_  
22 Jennifer K Miao  
23  
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