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Superior Court of California,  
County of San Diego

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Clerk of the Superior Court  
By C. Hines ,Deputy Clerk

Attorneys for Defendants  
MCKINNON BROADCASTING COMPANY and STEPHEN SADLER

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

ANNA LAUREL, an individual,

Case No.: 37-2023-00032123-CU-OE-CTL

Plaintiff,

**DEFENDANTS' OFFER TO  
COMPROMISE PURSUANT TO  
C.C.P. § 998**

MCKINNON BROADCASTING CO. KUSI-TV 51, a California Corporation; STEPHEN SADLER, an individual; and DOES 1 through 25, Inclusive,

Dept.: C-73  
Judge: Hon. Joel R. Wohlfeil

Case Filed: July 28, 2023

## Defendants.

**TO PLAINTIFF ANNA LAUREL AND HER ATTORNEYS OF RECORD:**

2 Pursuant to section 998 of the Code of Civil Procedure (“C.C.P”), Defendants  
3 McKinnon Broadcasting Company and Stephen Sadler (collectively, “Defendants”)  
4 hereby offer to compromise and settle this action by having Plaintiff Anna Laurel  
5 dismiss all claims with prejudice, in exchange for Defendants’ payment to Plaintiff of  
6 the total amount of \$87,850.00, inclusive of all claims, attorneys’ fees and costs, with  
7 each settling party bearing their own costs and attorneys’ fees.

8 PLEASE TAKE NOTICE THAT, pursuant to C.C.P. section 998(b)(2), if this  
9 offer is not accepted and notice of acceptance given by Plaintiff within thirty (30) days  
10 of this offer being made, it shall be deemed withdrawn and cannot be given in evidence  
11 at trial. Further, pursuant to C.C.P. section 998(c)(1), if Plaintiff fails to obtain a more  
12 favorable judgment, Plaintiff will not recover any of her costs incurred after the date  
13 this offer is served, and Plaintiff will be liable for Defendants' costs incurred post-offer.  
14 These costs may include the reasonable fees and costs of Defendants' expert witnesses,  
15 in addition to costs to which Defendants are entitled if found to be a prevailing party  
16 under C.C.P. sections 1032 *et seq.*

17 . If you wish to accept this offer, please date and sign the accompanying Notice of  
18 Acceptance of Section 998 Offer below.

21 DATED: January 8, 2025

FITZGERALD KNAIER LLP

By:   
Kenneth M. Fitzgerald  
Brooke L. Raunig  
Attorneys for Defendants McKinnon Broadcasting  
Company and Stephen Sadler

## NOTICE OF ACCEPTANCE OF SECTION 998 OFFER

Pursuant to section 998 of the Code of Civil Procedure, Plaintiff Anna Laurel hereby accepts the above offer on the terms stated.

DATED: January 25, 2025

GRUENBERG LAW

By: 

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Joshua D. Gruenberg  
Joshua P. Pang  
Pamela Vallero  
Attorneys for Plaintiff Anna Laurel

SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN DIEGO		<i>for court use only</i>
Attorney(s) Name and Address JOSH D. GRUENBERG, SB #163281 JOSHUA P. PANG, SB #296371 GRUENBERG LAW 2155 First Ave, San Diego, CA 92101		ELECTRONICALLY FILED Superior Court of California, County of San Diego 1/23/2025 3:55:28 PM Clerk of the Superior Court By C. Hines ,Deputy Clerk
Name of Case (abbreviated) <b>LAUREL v. MCKINNON BROADCASTING CO. KUSI-TV 51, et al.</b>		
Attorney(s) For	Telephone	Case Number
Plaintiff	(619) 230-1234	37-2023-00032123-CU-OE-CTL

PROOF OF SERVICE

I, the undersigned, declare that I am over the age of 18 years and not a party to this action; I am employed in the County of San Diego, State of California, within which County the subject mailing occurred; my business address is 2155 First Avenue, San Diego, CA 92101.

On January 23, 2025, I served the following document(s):

1. **PLAINTIFF ANNA LAUREL'S ACCEPTANCE OF DEFENDANTS' CCP §998 OFFER TO COMPROMISE.**

By Electronic Mail Transmission

Kenneth M. Fitzgerald, Esq. (kfitzgerald@fitzgeraldknaier.com)  
Brooke L. Raunig, Esq. (braunig@fitzgeraldknaier.com)  
FITZGERALD KNAIER LLP  
402 West Broadway, Suite 1400  
San Diego, CA 92101

Attorney for Defendants,  
MCKINNON BROADCASTING COMPANY and STEPHEN SADLER

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on January 23, 2025, at San Diego, California.



Joshua Pang