

PROOF OF ELECTRONIC SERVICE

I declare that I am over 18 years of age and am a party to this proceeding.

On September 20, 2026 I electronically served the foregoing Emergency Application for Stay of Enforcement Pending Petition for Writ of Certiorari and its appendix through the court's approved electronic filing service provider on Respondent Susan J. Brown through her appellate counsel of record, Robert M. Dato, and on all other counsel appearing on the official service list in Brown v. Mansueto, Supreme Court No. S296952 and Court of Appeal No. G066603.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on September 20, 2026 at Lakeside, California.

/s/ Robert F. Mansueto
ROBERT F. MANSUETO