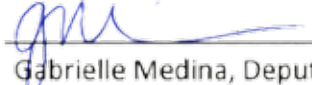


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San Luis Obispo Superior Court

By: 
Gabrielle Medina, Deputy Clerk

Counsel for Petitioner/Plaintiff Kathie Walker

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN LUIS OBISPO**

KATHIE WALKER,

Petitioner/Plaintiff,

v.

BOARD OF TRUSTEES OF THE
CALIFORNIA STATE UNIVERSITY,
et al.,

Respondents/Defendants.

Case No. 26CV-0166

Hon. Tana L. Coates

**Declaration of Kathie Walker in Support
of her Motion for Judgment on Verified
Petition for Writ of Mandate**

Hearing: November 4, 2026
Time: 9:00 a.m.
Dept.: 4

Action filed: March 18, 2026

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I, Kathie Walker, declare:

1. I am the petitioner in the above-referenced action. I am more than 18 years old and making this declaration in support of my Motion for Judgment on Verified Petition for Writ of Habeas Corpus (the "Motion"). The statements below are based on my personal knowledge, except for those statements based on information and belief (of which I am informed and believe to be true). If called to the stand in court, I could and would testify competently about the contents of this declaration.

2. In 2009, my family and I moved to the Alta Vista neighborhood in San Luis Obispo, California (“City”). The neighborhood is directly south of California Polytechnic State University, San Luis Obispo (“Cal Poly”). But it is located within the type of low-density residential neighborhood where fraternity houses, as that term is defined by City code, are ostensibly allowed to operate.

3. When my family moved to Alta Vista in 2009, our neighbors included families with children, college students, working professionals, retirees, university faculty, and others. I expected some student activity and occasional noise associated with living near Cal Poly. For our first several years in the neighborhood, that expectation generally matched our experience. The first fraternity-related disturbance I recall was St. Fratty's Day in 2015, when a roof fell at a fraternity event on Hathway Avenue and emergency responders declared a mass-casualty incident. Although that event was alarming, it did not happen again until March 2022, the academic year that I began noticing an increase in fraternity activity.

4. Starting around fall 2021, my family and I began noticing what appeared to be frat parties being thrown in nearby properties. As activity increased over each year, large numbers of people would travel between events. The resulting noise, pedestrian traffic, and disruptions repeatedly interfered with our family's ability to sleep and enjoy our property. As I stated in my deposition, the associated noise, disruptions, and harassment we faced forced me and my family to move to another neighborhood in 2025.

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1 5. Over the last several years, I have been submitting complaints to the City about
2 fraternity parties in my former neighborhood and elsewhere. And I have taken various steps, in-
3 cluding submission of public records requests to Cal Poly and to the City, to learn as much as I
4 can about the parties being thrown in areas of the City where they are supposed to be off limits.

5 6. In October 2024, for example, I asked Cal Poly for a copy of the policies and guide-
6 lines governing the registration of fraternity events. In response, Cal Poly provided me a copy of
7 the procedures as of their September 2024 revisions. A true and correct copy of that document
8 is attached, as **Exhibit 7**, to the Index of Exhibits concurrently filed with the Motion.

9 7. Also, as indicated in the Petition, my effort to obtain public records from Cal Poly
10 led to its disclosure of redacted copies of fraternity party-registration forms compiled from 2023
11 through 2025 by Cal Poly’s Office of Fraternity & Sorority Life (“FSL Office”). True and correct
12 copies of examples of the registration forms Cal Poly has disclosed to me in response to a public
13 records request are attached, as **Exhibit 8**, to the Index of Exhibits concurrently filed with the
14 Motion.

15 8. Meanwhile, I also learned that in approximately spring 2025, Cal Poly encouraged
16 fraternities to use an online app called DoorList (available at <https://www.doorlist.app/>) to
17 schedule, promote, and organize fraternity events.

18 9. Around February 2, 2026, I created a DoorList account to access and review de-
19 tails of Cal Poly fraternity parties being promoted on the app. Through my experience using it
20 until approximately April 1, 2026, I learned that the app allows users to search events by specific
21 fraternities and displays key information about upcoming parties, including the party theme, date
22 and time, and, often, the specific address where the party would be held. In cases where party
23 addresses were not immediately displayed (for example, as part of the graphic promoting the
24 event), a user could learn the specific address after clicking on the event and then indicate
25 whether they would be attending.

26 10. True and correct copies of some screenshots I took of several fraternity parties
27 promoted on DoorList from fall 2025 through early 2026 are attached, as **Exhibit 9**, to the Index
28 of Exhibits concurrently filed with the Motion.

1 11. In April 2026, I submitted a public records request to the City seeking, among
2 other things, communications between Cal Poly and the San Luis Obispo Police Department
3 (“SLOPD”) regarding fraternity parties registered with the FSL Office and the addresses of
4 those events.

5 12. In response to that public records request, the City disclosed to me a substantial
6 number of emails by which Cal Poly shared with SLOPD details, including addresses, of upcoming
7 fraternity parties. The emails from Cal Poly disclosing that information are dated from approximately
8 February 2022 through March 2024. True and correct copies of my April 2026 public
9 records request to the City and excerpts of the City’s disclosures in response to that request
10 are attached, as **Exhibit 12**, to the Index of Exhibits concurrently filed with the Motion.

11
12 I declare under penalty of perjury under the laws of the State of California that the foregoing
13 is true and correct.

14 Date: June 12, 2026

15 
16 Kathie Walker