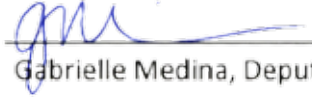


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San Luis Obispo Superior Court

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 UNIVER-
SITY,
et al.,

Respondents/Defendants.

Case No. 26CV-0166

Hon. Tana L. Coates

**Declaration of Matthew S.L. Cate in Sup-
port of Petitioner's 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, Matthew S.L. Cate, declare:

1. I am an attorney licensed to practice in California and counsel for Petitioner Walker in this action. I am more than 18 years old and am making this declaration in support of Ms. Walker's Motion for Judgment on Verified Petition for Writ of Mandate and Compulsory Declaratory and Injunctive Relief ("Motion"). The statements below are based on my personal knowledge, except for those stated on information and belief (of which I am informed and believe to be true). If called as a witness, I could and would testify competently about the facts of this declaration.

2. The website of the City of San Luis Obispo (“City”) (specifically, at [/www.slocity.org/government/open-government/open-city-hall](http://www.slocity.org/government/open-government/open-city-hall)) provides a link to an source on which the City publishes its Municipal Code: <https://sanluisobispo.municipal.codes/>. On May 16, 2026, I visited that site to retrieve PDF printouts of Code sections 20, 17.86.130, and 17.156.014, which are cited in the Motion. For the Court’s convenience, the relevant excerpts of those Code provisions are attached as **Exhibit 1** to the Index of Exhibits filed concurrently with the Motion.

3. The City also publishes copies of resolutions passed by the City's Planning Commission at <https://opengov.slocity.org/WebLink/Browse.aspx?id=59920&dbid=0&repo=ark>. True and correct copies of five Planning Commission resolutions available from that (and specifically from its subfolders for resolutions considered in 2025 and 2026) are attached as **Exhibit 2** to the Index of Exhibits filed concurrently with the Motion.

4. The City publishes information about City Council meetings online at www.slocity.org/government/mayor-and-city-council/agendas-and-minutes. It has thus online the agenda for a Special Meeting of the City Council held May 26, 2026. That contains a link to a Council Agenda Report prepared by John Mezzapesa, City Code Enforcement Supervisor, regarding “Code Enforcement Priorities.” That report is available at

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1 <https://pub-slocity.escribemeetings.com/filestream.ashx?DocumentId=24888>. A true and cor-
2 rect copy of combined excerpts of that report is attached as **Exhibit 3** to the Index of Exhibits
3 filed concurrently with the Motion.

4 5. California Polytechnic State University, San Luis Obispo (“Cal Poly”) publishes
5 online its “RSO Handbook,” which is described as Cal Poly’s “guide to understanding policies
6 and identifying resources for Recognized Student Organizations.” The handbook is available at
7 <https://osrr.calpoly.edu/club-policies>. On June 10, 2026, I downloaded a PDF version of that
8 handbook. A true and correct copy of combined excerpts of that handbook is attached as **Exhibit**
9 **4** to the Index of Exhibits filed concurrently with the Motion.

10 6. The California Legislature maintains and publishes legislative analyses of Assem-
11 bly Bill 524 (2021-2022) at [https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?](https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=202120220AB524)
12 [bill_id=202120220AB524](https://leginfo.legislature.ca.gov/faces/billAnalysisClient.xhtml?bill_id=202120220AB524). From that website I obtained a PDF copy of the Assembly Floor Anal-
13 ysis, Concurrence in Sen. Amendments to AB 524 (2021-2022 Reg. Sess.) as amended Aug. 15,
14 2022. A true and correct copy of that analysis is attached as **Exhibit 5** to the Index of Exhibits
15 filed concurrently with the Motion.

16 7. On June 10, 2026, I accessed the web page for Cal Poly’s Office of Fraternity and
17 Sorority Life (“FSL Office”) available at <https://greeklife.calpoly.edu/fsl-office-overview>. A
18 true and correct PDF copy of that page is attached as **Exhibit 6** to the Index of Exhibits filed
19 concurrently with the Motion.

20 8. On May 18, 2026, I visited the Instagram page for the Delta Upsilon fraternity
21 recognized by Cal Poly and obtained a PDF copy of a May 8, 2026, post (available at
22 <https://www.instagram.com/p/DYFxKq6kqiY/>) promoting a fraternity event at 281 Albert
23 Drive in San Luis Obispo. I also obtained a PDF copy of a May 15, 2025, post (available at
24 <https://www.instagram.com/p/DJsRg7nSf28/>) promoting a fraternity event at 1868 Loomis
25 Street in San Luis Obispo. True and correct copies of those PDFs are attached as **Exhibit 10** to
26 the Index of Exhibits filed concurrently with the Motion.

27 9. Also on May 18, 2026, I accessed a website Cal Poly maintains called “Cal Poly
28 Now,” <https://now.calpoly.edu/events>, which allows student organizations to promote events.

1 On that site, I searched for events promoted by campus-recognized fraternities and printed sev-
2 eral posted events as PDFs. True and correct copies of those PDFs are attached as **Exhibit 11** to
3 the Index of Exhibits filed concurrently with the Motion.

4 10. On various dates in mid-May 2026, I visited the websites of multiple news organ-
5 izations to obtain copies of the following articles, published on various dates, about conflicts be-
6 tween fraternity houses and their neighbors:

7 a. Matt Dotray, *Denied West Lubbock zoning case reveals neighbor concerns with*
8 *fraternity house, Lubbock Avalanche-Journal* (Nov. 3, 2016), [https://www.lub-](https://www.lubbockonline.com/story/news/local/2016/11/03/denied-west-lubbock-zoning-case-reveals-neighbor-concerns-fraternity-house/14888714007/)
9 [bockonline.com/story/news/local/2016/11/03/denied-west-lubbock-zoning-case-reveals-](https://www.lubbockonline.com/story/news/local/2016/11/03/denied-west-lubbock-zoning-case-reveals-neighbor-concerns-fraternity-house/14888714007/)
10 [neighbor-concerns-fraternity-house/14888714007/](https://www.lubbockonline.com/story/news/local/2016/11/03/denied-west-lubbock-zoning-case-reveals-neighbor-concerns-fraternity-house/14888714007/);

11 b. Jackson Sledge, *Alpha Sig sparks lawsuit and zoning backlash*, The MSU Ex-
12 ponent (Feb. 16, 2023), [https://www.msuxponent.com/news/alpha-sig-sparks-lawsuit-](https://www.msuxponent.com/news/alpha-sig-sparks-lawsuit-and-zoning-backlash/article_1929d976-ae1b-11ed-848a-6f3e3a9d95fc.html)
13 [and-zoning-backlash/article_1929d976-ae1b-11ed-848a-6f3e3a9d95fc.html](https://www.msuxponent.com/news/alpha-sig-sparks-lawsuit-and-zoning-backlash/article_1929d976-ae1b-11ed-848a-6f3e3a9d95fc.html);

14 c. Elena Barrera, *‘Shut it down’: Tallahassee residents fuming as fraternity*
15 *moves into the neighborhood*, Tallahassee Democrat (Sept. 19, 2023), [https://www.tallahas-](https://www.tallahassee.com/story/news/local/2023/09/19/pi-lambda-phi-fraternity-house-move-in-rankles-tallahassee-neighbors/70854894007/)
16 [see.com/story/news/local/2023/09/19/pi-lambda-phi-fraternity-house-move-in-rankles-talla-](https://www.tallahassee.com/story/news/local/2023/09/19/pi-lambda-phi-fraternity-house-move-in-rankles-tallahassee-neighbors/70854894007/)
17 [hassee-neighbors/70854894007/](https://www.tallahassee.com/story/news/local/2023/09/19/pi-lambda-phi-fraternity-house-move-in-rankles-tallahassee-neighbors/70854894007/);

18 d. Fiona Hastings and Katy Clark, *San Luis Obispo and Cal Poly criticized for*
19 *fraternity housing management*, Mustang News (Nov. 12, 2025), [https://mustangnews.net/san-](https://mustangnews.net/san-luis-obispo-grand-jury/)
20 [luis-obispo-grand-jury/](https://mustangnews.net/san-luis-obispo-grand-jury/); and

21 e. Samuel O’Neal, *‘Stop these ridiculous parties’: TCU neighborhoods are*
22 *uniting to take a stand*, Fort Worth Star-Telegram (Jan. 15, 2026), [https://www.star-tele-](https://www.star-telegram.com/news/local/fort-worth/article314320635.html)
23 [gram.com/news/local/fort-worth/article314320635.html](https://www.star-telegram.com/news/local/fort-worth/article314320635.html).

24 11. True and correct copies of PDF versions of those news articles are collectively
25 attached as **Exhibit 13** to the Index of Exhibits filed concurrently with the Motion.

26 12. On May 14, 2026, I visited a web page maintained by Cal Poly for its Office of the
27 Registrar, specifically https://registrar.calpoly.edu/content/stu_info/ferpa, to review and ob-
28 tain a copy of its publicly posted statement regarding the Family Educational Rights and Privacy

1 Act. A true and correct PDF version of that page is attached as **Exhibit 14** to the Index of Exhibits
2 filed concurrently with the Motion.

3
4 I declare under penalty of perjury under the laws of the State of California that the fore-
5 going is true and correct.

6
7 Date: June 12, 2026



Matthew S.L. Cate