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17 Attorneys for Petitioner  
18 Emergency Shelter Coalition

19 THE SUPERIOR COURT OF CALIFORNIA  
20 FOR THE COUNTY OF ORANGE

21 **Emergency Shelter Coalition,**  
22 a non-profit organization,

23 Petitioner,

24 v.

25 **City of San Clemente; City Council of**  
26 **San Clemente; and Planning**  
27 **Commission of City of San Clemente,**

28 Respondents.

Case No. 30-2019-01080355-CU-WM-CXC  
Hon. Randall J. Sherman

**Declaration of Richard J. McNeil In Support  
Of Petitioner Emergency Shelter Coalition's  
Ex Parte Application for an Order  
Confirming CEQA Hearing Date**

[Filed Concurrently with *Ex Parte* Application,  
the Declaration of Brooke Weitzman, and a  
[Proposed] Order]

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Date: September 20, 2019  
Time: 1:30 p.m.  
Dept.: CX105  
Action Filed: June 28, 2019

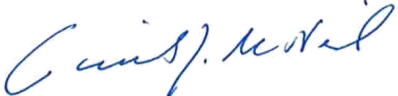
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I, Richard J. McNeil, declare as follows:

1. I am a partner at the law firm of Crowell & Moring LLP. I am a member in good standing of the California State Bar and am licensed to practice before all courts of the State of California. I am an attorney of record in this action for Claimant Emergency Shelter Coalition (“ESC”). I have personal knowledge of the facts contained herein and, if called upon to do so, I could and would testify competently thereto.

2. For the reasons set forth in the concurrently filed *Ex Parte* Application for an Order Confirming CEQA Hearing Date, ESC risks suffering irreparable harm if the Court does not grant the relief sought. This relief could not be obtained in sufficient time to avoid this harm if ESC sought the relief through a regularly noticed motion.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on this 19 of September, 2019, at Irvine, California.

  
\_\_\_\_\_  
Richard J. McNeil