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August 16, 2022

CONFIDENTIAL SETTLEMENT COMMUNICATIONS  
EVIDENCE CODE § 1152  
VIA ELECTRONIC MAIL ONLY

Steven M. Wise  
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Nonhuman Rights Project  
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Jake Davis  
Staff Attorney  
Nonhuman Rights Project  
1911 W. Elk Place  
Denver, Colorado 54032  
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Re: *Nonhuman Rights Project, Inc. v. Fresno's Chaffee Zoo Corporation et al.*  
San Francisco County Superior Court Case No. CPF22517751  
First District Court of Appeal, Division Two, Case No. A165693  
Fresno County Superior Court Case No. (N/A pending docketing after transfer)  
**Response to Petitioner's Offer to Settle and Counteroffer**  
Our File No. 32357.2

Dear Mr. Wise:

We have received your correspondence dated August 11, 2022 regarding your client's offer to settle the above referenced litigation. After thoughtful consideration, we are not willing to accept your offer.

As a counteroffer, we are willing to waive our costs-to-date in exchange for your client withdrawing its habeas corpus petition and promptly dismissing this action with prejudice.

Very truly yours,

*s/ David C. Casarrubias*

David C. Casarrubias  
Associate

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DCC

cc: Paul B. Mello  
Adam W. Hofmann  
Samantha D. Wolff  
Doug Larsen