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Attorneys for Respondent,
 ALICE EVANS

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 FOR THE COUNTY OF LOS ANGELES**

In re the Marriage of

Petitioner: IOAN GRUFFUDD
 and

Respondent: ALICE EVANS

Case No.: 21STFL02019

JUDGE JOSH FREEMAN STINN
 Department 6

**STIPULATION AND ORDER RE
 LISTING AND SALE OF REAL
 PROPERTY AND ORDERS FOR
 DISTRIBUTION OF NET SALES
 PROCEEDS IN CONNECTION
 THEREWITH**

HEARING DATE:

Date: January 25, 2023

Time: 8:30 a.m.

Dept.: 6

IT IS HEREBY STIPULATED by and between Petitioner, IOAN GRUFFUDD
 ("Petitioner"), individually and through his attorneys of record, Anne C. Kiley, Esq. and Katherine
 M. Heersema, Esq. of Elkins Kalt Weintraub Reuben Gartside LLP, and Respondent, ALICE
 EVANS ("Respondent"),¹ individually and through her attorney of record, Marie A. LaMolinara,
 Esq. of Meyer, Olson, Lowy & Meyers, LLP, as follows:

1. The Parties, joined by their respective attorneys of record, hereby acknowledge that
 Petitioner filed his pending Request for Order on December 2, 2022 ("Petitioner's RFO"), seeking
 an order to list and sell the Parties' former family residence located on La Jolla Avenue ("La Jolla
 Residence").² The hearing on Petitioner's RFO is currently scheduled for 8:30 a.m. on January 25,

¹ Petitioner and Respondent are collectively referred to as the "Parties" and individually as a "Party."

² For the protection of Respondent and the Parties' minor children, the Parties hereby agree to withhold
 disclosure of the full residential address of their former family residence, which is easily identified as it is the

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2023, in Department 6 of the Los Angeles Superior Court.

2. To resolve all issues pending in Petitioner's RFO, which shall forthwith be taken off calendar with prejudice, the Parties hereby stipulate and agree as follows:

a. The Parties shall forthwith cooperate to list for sale and sell the La Jolla Residence.

b. Petitioner shall utilize Rosalie Klein ("Ms. Klein"), DRE#:1115025 of The Agency as his listing agent and Respondent shall utilize Brianna Deutsch ("Ms. Deutsch"), DRE#:01752007 of Rodeo Realty, Inc. as her listing agent, and Ms. Klein and Ms. Deutsch shall jointly list the La Jolla Residence for sale. Each Party shall instruct his/her respective listing agent to provide him/her with all information related to the listing and sale of the La Jolla Residence.

c. The Parties shall cooperate and share joint decision-making authority over all aspects of the listing and sale of the La Jolla Residence, including, but not limited to, determination of a listing price and adjustment of same, if appropriate, the terms of sale, accepting and providing counteroffers, and implementing escrow conditions and instructions.

d. The Parties shall submit agreed upon counteroffers to any offers for purchase within 48 hours of receipt of any offer, unless otherwise agreed to by the Parties in writing or ordered by the Court.

e. The La Jolla Residence shall be made available for showings within 24 hours' written notice by the listing agent(s).

f. All communications between the Parties regarding the listing and sale of the La Jolla Residence shall occur through their respective listing agents, not directly to one another. Such communication(s) made indirectly through third parties shall in no way be deemed a violation of the existing restraining order.

g. Unless otherwise agreed by Respondent in writing, the terms of sale shall include an at least 30-day option for lease back after the close of escrow to provide Respondent with at least 30 days from the close of escrow to relocate and move to another residence.

h. The Parties shall cooperate to execute all documents reasonably necessary to effectuate a transfer of title to the La Jolla Residence from Wayne Mejia, Trustee of the Angel Trust Dated February 28, 2006, into the names of the Parties jointly and as otherwise deemed necessary to facilitate the Parties' ability to list for sale and sell the La Jolla Residence.

i. Subject to the distributions required hereinbelow, all remaining net sales

only real property in which either Party has an interest.

proceeds received from the sale of the La Jolla Residence, after distribution(s) to each Party and their respective counsel as set forth below, and payment of the mortgage, property taxes, closing costs and fees, and realtors' commissions related to the sale, shall be transferred by escrow directly into a blocked financial account maintained jointly in the names of the Parties which shall be opened for the purpose of holding said proceeds ("Blocked Account"). The Parties shall cooperate and execute all documents reasonably necessary to open said Blocked Account within five (5) business days of the opening of escrow for the sale of the La Jolla Residence. Each Party shall be designated as signatories on the Blocked Account and no transfers, deposits, distributions or withdrawals of the funds held in the Block Account shall be made without the prior written agreement signed by both Parties and his/her counsel or a Court order. No debit cards or checks shall be issued on the Blocked Account to either Party.

j. Forthwith upon the close of escrow, the Parties shall instruct escrow to make the following distributions:

1. The sum of \$110,000 shall be distributed to each Party, for a total distribution of \$220,000, subject to characterization, allocation and chargeability at the time of trial.

2. The sum of \$90,000 shall be distributed to the law firm of Elkins Kalt Weintraub Reuben Gartside LLP, on account for Petitioner's attorneys' fees and costs, subject to characterization, allocation and chargeability at the time of trial.

3. The sum of \$90,000 shall be distributed to the law firm of Meyer, Olson, Lowy & Meyers, LLP, on account for Respondent's attorneys' fees and costs, subject to characterization, allocation and chargeability at the time of trial.

k. The Court shall retain jurisdiction to resolve any disputes regarding the listing and sale of the La Jolla Residence, including the listing price, adjustments in listing price, counteroffers, terms and sale and acceptance and may do so on *ex parte* application of either Party provided that notice is provided by 10:00 a.m. the day prior to the hearing of the *ex parte* application.

3. The Parties acknowledge and agree that each Party has read the within Stipulation and Order; has been represented and advised fully by counsel of his/her own choosing at all stages of the negotiations associated therewith; is fully aware of the content and legal effect; and has entered into the within Stipulation and Order voluntarily and free of any duress, undue influence, or presently known or suspected fraud.

4. Each Party, by his/her signature below, agrees that the Parties' execution of this

Stipulation and Order renders all terms and conditions set forth herein enforceable as of the effective date (i.e., the last signature date on which this Stipulation and Order is signed by the Parties and their respective counsel), irrespective of whether said Stipulation and Order is entered as an Order of this Court. In that regard, this Stipulation and Order shall not depend upon entry as a California Court Order for its effectiveness and/or enforceability.

5. This Stipulation and Order may be executed in counterparts which shall be deemed to be an original. Electronic signatures and/or the signature pages of this Stipulation and Order transmitted by facsimile, electronic mail, or any other electronic means intended to preserve the original graphic and pictorial appearance, shall likewise be deemed an original pursuant to California *Rules of Court*, Rule 2.305(d), and California *Civil Code*, §1633.7, respectively.

IT IS SO STIPULATED:

Dated: January __, 2023

By: Electronic Signature Attached
IOAN GRUFFUDD,
Petitioner

Dated: January 24, 2023

By: *Alice Evans*
Alice Evans (Jan 24, 2023 11:13 PST)
ALICE EVANS,
Respondent

APPROVED AS TO FORM:

Dated: January __, 2023

ELKINS KALT WEINTRAUB REUBEN
GARTSIDE LLP

By: Electronic Signature Attached
ANNE C. KILEY, ESQ.
KATHERINE M. HEERSEMA, ESQ.
Attorneys for Petitioner

Dated: January 24, 2023

MEYER, OLSON, LOWY & MEYERS, LLP
By: *Marie LaMolinara*
MARIE A. LAMOLINARA, ESQ.
Attorneys for Respondent

HAVING BEEN SO STIPULATED, IT IS SO ORDERED.

DATED:

HONORABLE JOSH FREEMAN STINN
JUDGE OF THE SUPERIOR COURT

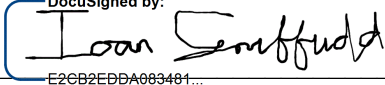
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IT IS SO STIPULATED:

Dated: January 24, 2023

DocuSigned by:

E2CB2EDDA083481...
By: IOAN GRUFFUDD,
Petitioner


Dated: January __, 2023

By: Electronic Signature Attached
ALICE EVANS,
Respondent

APPROVED AS TO FORM:

Dated: January 24, 2023

ELKINS KALT WEINTRAUB REUBEN
GARTSIDE LLP

By: 
ANNE C. KILEY, ESQ.
KATHERINE M. HEERSEMA, ESQ.
Attorneys for Petitioner

Dated: January __, 2023

MEYER, OLSON, LOWY & MEYERS, LLP

By: Electronic Signature Attached
MARIE A. LAMOLINARA, ESQ.
Attorneys for Respondent

HAVING BEEN SO STIPULATED, IT IS SO ORDERED.

DATED:

HONORABLE JOSH FREEMAN STINN
JUDGE OF THE SUPERIOR COURT