



August 29, 2025

Via Truefiling

Jorge E. Navarrete
Clerk and Executive Officer of the Court
Supreme Court of California
San Francisco, CA 94102

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Re: *Morgan (Barbara) et al. v. Ygrene Energy Fund, Inc. et al. – S277628*

Dear Mr. Navarrete:

Counsel for Respondents Ygrene Energy Fund, Inc. et al., wish to advise the Court of the following supplemental authority that was not available at the time briefing was completed:

- *Hovannisian v. City of Fresno*, 107 Cal.App.5th 833 (Dec. 23, 2024).

Respectfully submitted,

/s/ Ali M. Abugheida

Ali M. Abugheida

Counsel for Respondents Ygrene Energy Fund, Inc., GoodGreen 2016-1, GoodGreen 2017-1, GoodGreen 2017-2, GoodGreen 2018-1, GoodGreen 2019-1, GoodGreen 2015 LLC, GoodGreen 2016- 1 LLC, GoodGreen 2016-1 Trust, GoodGreen Holdings 2016- A Trust, GoodGreen 2017-1 Trust, GoodGreen Funding 2016-1 LLC, GoodGreen Funding 2017-1 LLC, GoodGreen Funding 2017-2 LLC, GoodGreen Funding 2017-R1 LLC, GoodGreen Funding 2018-1 LLC, GoodGreen Holdings 2016-A Trust, and Renew Financial Group, LLC; Renew 2017-1; Renew 2017-2; and Renew 2018-1

PROOF OF SERVICE

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the District of Columbia. My business address is 2100 Pennsylvania Ave. NW, Washington, DC 20037. On August 29, 2025, I served true copies of the following documents described as:

LETTER DATED AUGUST 29, 2025 REGARDING SUPPLEMENTAL AUTHORITY

on the interested parties in this action as follows:

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BY ELECTRONIC SERVICE: I served the document(s) on the person(s) listed in the Service List by submitting an electronic version of the document(s) to TrueFiling, through the user interface at www.truefiling.com.

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

Executed on August 29, 2025, at Washington, District of Columbia.



KV Viet

STATE OF CALIFORNIA
Supreme Court of California

PROOF OF SERVICE

STATE OF CALIFORNIA
Supreme Court of California

Case Name: **MORGAN v. YGRENE ENERGY FUND**

Case Number: **S277628**

Lower Court Case Number: **D079364**

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. My email address used to e-serve: **aabugheida@orrick.com**
3. I served by email a copy of the following document(s) indicated below:

Title(s) of papers e-served:

Filing Type	Document Title
LETTER	Letter re Supplemental Authority

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This proof of service was automatically created, submitted and signed on my behalf through my agreements with TrueFiling and its contents are true to the best of my information, knowledge, and belief.

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

8/29/2025

Date

/s/Ali Abugheida

Signature

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Last Name, First Name (PNum)

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