

05/28/2026

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Petitioner In Propria Persona

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO**

ALISON MONAHAN,

Petitioner,

v.

PROFESSIONAL SKI INSTRUCTORS OF
AMERICA – WESTERN DIVISION, a
California nonprofit mutual benefit
corporation,

Respondent.

Case No. 26CV012327

EX PARTE APPLICATION FOR (1)
ORDER TO SHOW CAUSE; (2) ORDER
SHORTENING TIME; AND (3)
DIRECTIONS FOR SERVICE;
MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT;
DECLARATION OF ALISON MONAHAN
IN SUPPORT

Hearing: June 1, 2026, 9:00 a.m.

Dept.: 8D

Judge: Hon. Julie G. Yap

Res. ID: 035934138217

Related Case: Moore et al. v. PSIA-AASI
Western Division et al., No. 26CV009976
(Hon. Julie G. Yap, Dept. 8D)

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE that on June 1, 2026, at 9:00 a.m., or as soon thereafter as the matter may be heard, in Department 8D of the above-entitled Court, located at the Tani G. Cantil-Sakauye Courthouse, 500 G Street, Sacramento, California 95814 (or such other location as the Court may direct), Petitioner Alison Monahan, appearing in propria persona, will and hereby does apply ex parte to the Court for the following procedural relief, in connection with her Verified Petition for Order

Compelling Inspection of Corporate Records under California Corporations Code § 8336, filed in this action on May 21, 2026:

- An Order to Show Cause why the Corporation should not be ordered to produce the records demanded in Petitioner's May 12, 2026 demand under California Corporations Code § 8333 and Petitioner's May 13, 2026 supplemental demand under the same section;
- An Order Shortening Time for the hearing on the Order to Show Cause and for service and response thereto; and
- Directions for service of the Order to Show Cause, the supporting papers, and any further orders the Court may issue.

This Application is based on this notice, the accompanying Memorandum of Points and Authorities, the accompanying Declaration of Alison Monahan in Support of Ex Parte Application, the exhibits attached thereto, the Verified Petition and supporting papers filed in this action on May 21, 2026, the Court's file in this action, the Court's file in the related action *Moore et al. v. PSIA-AASI Western Division*, Sacramento Superior Court Case No. 26CV009976, and on such further argument and evidence as may be presented at the hearing.

This Application requests procedural scheduling relief only. It does not request a temporary restraining order, preliminary injunction, or other substantive interim relief.

DATED: May 28, 2026.



Alison Monahan, Petitioner

In Propria Persona

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(b) on the Corporation by electronic mail to westernBOD@psia-w.org (the Corporation's published Board correspondence address) and mcooper@thesnowpros.org (the Corporation's Chief Executive Officer).

II. PROCEDURAL BACKGROUND

The full factual record is set forth in the Verified Petition and the supporting Declaration of Alison Monahan, both filed May 21, 2026, and in the Declaration of Alison Monahan in Support of this Application. This Memorandum summarizes only what the ex parte showing requires and cross-references those documents for the balance.

The Petitioner, the demands, and the non-response. Petitioner is a voting member in good standing of Respondent PSIA-AASI Western Division, a California nonprofit mutual benefit corporation. Verified Petition ¶¶ 4–5. On May 12 and May 13, 2026, Petitioner served two written demands under Cal. Corp. Code § 8333, each transmitted both by electronic mail to the Corporation's published Board address and Chief Executive Officer and by certified mail to its designated mailing address, and each specifying a five-business-day acknowledgment deadline (expiring May 19 and May 20, 2026) and a fifteen-business-day production deadline. Verified Petition ¶¶ 14–21, 25; Monahan Decl. ¶¶ 10–18. From the transmittals through May 24, 2026, the Corporation produced no records, acknowledged no demand, raised no objection, and made no contact through any officer, director, employee, or counsel. Verified Petition ¶¶ 22–28; Monahan Decl. ¶ 20. The two certified mailings went unretrieved at the Corporation's designated mailing address from May 15 and May 18, 2026, respectively, until the afternoon of May 28, 2026, when both were picked up. Verified Petition ¶ 22; Monahan Decl. ¶ 19; Monahan Decl. ISO Ex Parte ¶ 22 & Ex Parte Ex. 11. No email transmittal generated any bounce-back or out-of-office reply. Monahan Decl. ¶¶ 12, 17.

2 **The May 7 and May 24 communications.** On May 7, 2026, Petitioner asked the Corporation,
3 through its counsel of record in the related *Moore* action, to confirm the factual basis on which each
4 currently-seated director holds office and to pause binding non-routine board action. Counsel's entire
5 substantive reply, on May 12, was "We will not be able to accede to your time constraints [sic]," and
6 the Corporation neither answered the factual questions nor agreed to any pause. Monahan Decl. ISO
7 Ex Parte ¶ 10 & Ex Parte Ex. 5. On May 24, 2026 — two days after Petitioner served the Notice of
8 Related Case on *Moore* counsel and notified the Corporation of this action through its institutional
9 channels — Bina Ahmad of Hadsell Stormer Renick & Dai LLP emailed that the firm was "reviewing"
10 the demands and would "respond to these letters in the next few days," without committing to a date
11 or addressing scope. Monahan Decl. ISO Ex Parte ¶¶ 11–12 & Ex Parte Ex. 8. Petitioner replied the
12 same evening requesting an exact timeframe and stating she would serve and file an ex parte
13 application. Counsel did not respond, and no further communication from counsel followed. Monahan
14 Decl. ISO Ex Parte ¶ 13 & Ex Parte Ex. 8.

15 **Personal service and the Corporation's May 27 response.** On May 27, 2026 at
16 approximately 3:26 p.m., the Summons, Verified Petition, supporting Declaration and Exhibits 1–18,
17 Notice of Related Case, Civil Case Cover Sheet, and Proposed Order were personally served on the
18 Corporation through its agent for service. Monahan Decl. ISO Ex Parte ¶ 14. At 4:45 p.m. the same
19 day — one hour and nineteen minutes later — the Corporation responded from its institutional channel
20 westernBOD@psia-w.org with a 9-page letter on its letterhead, signed "PSIA-AASI West Board of
21 Directors" but written in the voice of counsel ("We represent the Professional Ski Instructors of
22 America-Western Division... We write in response to your May 12 and May 13, 2026 records
23 requests"), transmitting a Dropbox link to an 18-folder, 694-page Bates-stamped production. Monahan
24 Decl. ISO Ex Parte ¶¶ 14–15 & Ex Parte Ex. 9. As detailed in Section IV.C, that production consisted

entirely of documents already publicly available before transmission, and the letter expressly refused to produce three further categories of records. As of the filing of this Application, no notice of appearance has been filed and no responsive pleading has been filed.

III. STATUTORY AND PROCEDURAL BASIS

A. Statutory enforcement authority — § 8336. California Corporations Code § 8336(a) provides:

Upon refusal of a lawful demand for inspection under this chapter, or a lawful demand pursuant to Section 8330 or Section 8333, the superior court of the proper county, or the county where the books or records in question are kept, may enforce the demand or right of inspection with just and proper conditions or may, for good cause shown, appoint one or more competent inspectors or independent accountants to audit the financial statements kept in this state and investigate the property, funds and affairs of any corporation and of any subsidiary corporation thereof, domestic or foreign, keeping records in this state and to report thereon in such manner as the court may direct.

The statute authorizes the court to enforce the inspection right "with just and proper conditions" and, for good cause shown, to appoint one or more competent inspectors or independent accountants. The text confers broad equitable discretion over both the substantive remedy and the conditions of enforcement.

B. The "without justification" finding. California Corporations Code § 8337 provides: "In any action or proceeding under this article, and except as required by Section 8331, if the court finds the failure of the corporation to comply with a proper demand thereunder was without justification,

2 the court may award the member reasonable costs and expenses, including reasonable attorneys' fees,
3 in connection with such action or proceeding."

4 **C. Procedural framework.** This Application is filed under California Rules of Court 3.1200
5 through 3.1207, which govern the procedure for ex parte applications. The relief requested is
6 procedural in character: issuance of an Order to Show Cause, an Order Shortening Time, and directions
7 for service. California Code of Civil Procedure § 1005(b) authorizes the court, on good-cause showing,
8 to "prescribe a shorter time" for notice of motions; the good-cause showing in Section IV below is
9 offered in support of shortened time under § 1005(b) and in support of setting the Order to Show Cause
10 hearing accordingly. The showing in Section IV also satisfies California Rules of Court 3.1202(c) as
11 an affirmative factual showing supporting procedural ex parte relief for scheduling of the underlying
12 Petition.

13 **D. Procedural posture distinguished.** This Application requests procedural scheduling relief
14 — issuance of an Order to Show Cause, an Order Shortening Time, and directions for service. It does
15 not request a temporary restraining order, preliminary injunction, or other substantive interim relief in
16 advance of a hearing on the merits.

17 **IV. GOOD CAUSE FOR EXPEDITED HEARING**

18 **A. The Corporation is positioned to consummate a multi-year executive-compensation**
19 **commitment it declined to pause, and the records documenting that act — which bear on a**
20 **sworn federal representation the Corporation will make again within months — are the**
21 **records it has expressly refused to produce.**

22 **The authorized-but-unimplemented contract.** The Corporation's own publicly-filed sworn
23 declarations in *Moore et al. v. PSIA-AASI Western Division*, No. 26CV009976, establish two facts
24 material to the records demanded:

- On February 28, 2026, the Corporation's Board of Directors recorded a motion, passed by a vote of 5-Yes, "to provide a multi-year employment contract to the CEO and Deputy Director." Declaration of Sowmya Subramanian ¶ 33, filed April 24, 2026, under penalty of perjury.
- As of April 24, 2026, "the board ha[d] not provided [Chief Executive Officer Cooper] a new or adjusted contract of employment nor ha[d] [she] signed any documentation other than [her] offer letter received on Aug 11, 2022." Declaration of Marisa Cooper ¶¶ 25, 35, filed April 24, 2026, under penalty of perjury.

Petitioner respectfully requests that the Court take judicial notice of these publicly-filed sworn declarations under California Evidence Code § 452(d). Read together, the two declarations establish that as of late April 2026 the multi-year contract was authorized but unexecuted — the corporate action was pending. A multi-year employment commitment for the two most senior officers of the Corporation is not ordinary, recurring business. It is a non-routine corporate act with multi-year financial consequences, and the declarations place its execution squarely in the present window.

A member's request to pause non-routine action — declined. On May 7, 2026, Petitioner asked the Corporation, through counsel of record in the related *Moore* action, to commit to a pause on binding non-routine board action while the dispute over the Corporation's governance remained unresolved. Monahan Decl. ISO Ex Parte ¶ 10 & Ex Parte Ex. 5. On May 12, 2026, the Corporation's response, in its entirety, was: "We will not be able to accede to your time constraints [sic]." *Id.* The Corporation did not commit to refrain from non-routine corporate action during the requested period. The following day, May 13, 2026, the Corporation published an Official Board Update formalizing officer appointments for the 2026–27 term. Petition Ex. 10; Monahan Decl. ¶ 14. Having refused to pause, the Corporation proceeded to act. Against that backdrop, a member cannot assume that the

2 authorized multi-year executive contract has been left in abeyance; the only records that would show
3 what the Board has in fact done are the records the Corporation has withheld.

4 **Express refusal of the precise records.** The May 12 Demand seeks, at paragraphs 23 through
5 25, the Board minutes, the drafts and any final contract considered in connection with the February 28
6 motion, the implementation communications, and the parallel records for the Deputy Director. Petition
7 Ex. 1. The Corporation produced none of them, and on May 27 expressly refused "the CEO's
8 compensation, hiring, and annual review records," a refusal that by its terms covers the entire scope
9 of those paragraphs. Monahan Decl. ISO Ex Parte ¶ 16 & Ex Parte Ex. 9 at 9. Petitioner cannot know
10 from outside the Corporation what has been done on the February 28 motion since the April 24 Cooper
11 declaration, or what is now in process. The withheld records would show both.

12 **The imminent sworn federal representation.** The federal-reporting calendar is why the
13 timing of inspection matters. The Corporation's fiscal year ends June 30, 2026. Bylaws § 13.1; Petition
14 Ex. 11. In the months following fiscal-year close, the Corporation's Chief Executive Officer will sign
15 the FY26 federal Form 990 under penalty of perjury. That return calls, at Part VI, Section B, line 15a,
16 for a representation as to whether the process the Corporation used to determine the Chief Executive
17 Officer's compensation included independent review, comparability data, and contemporaneous
18 substantiation of the deliberation and decision. The Corporation's Chief Executive Officer has made
19 that representation on each prior annual return, and will be called upon to make it again on the FY26
20 return — for a compensation period that includes the very multi-year contract authorized on February
21 28, 2026. The records that would substantiate (or fail to substantiate) that representation are the same
22 compensation, deliberation, and committee records the Corporation has now expressly refused to
23 produce. Inspection while those records remain contemporaneous to the FY26 reporting period —

rather than after the FY26 return is signed and the FY27 cycle takes over — is what preserves the records' value as a check on a representation the Corporation is about to make again.

The legal-fee reporting choice is documented, was the Chief Executive Officer's to make, and recurs this fiscal year. The Corporation's FY25 Form 990 reflects a second reporting choice the demanded accounting records bear on directly. The Corporation's Policy Governance Manual caps the Chief Executive Officer's authority to commit the Corporation to expenditures without Board approval at \$5,000. Petition ¶ 29. The Corporation's publicly-posted May 12, 2025 Board minutes record a motion to "approve payment of the outstanding invoice for legal services rendered through Holland & Hart" — already engaged and outstanding when the Board voted. The Holland & Hart invoice reflects costs to the Corporation in excess of \$30,000. Verified Petition ¶ 30. Its August 11, 2025 Finance Committee minutes attribute the year's budget overage to that expense ("[i]f not for H&H legal, we would not have had the overage") and record that classifying the invoice on the Corporation's books was "an operational decision for the CEO to drive on what line item to report the board legal expense under." *Id.* On the FY25 Form 990, signed by the Chief Executive Officer on November 12, 2025 under penalty of perjury, Part IX line 11b reports total outside legal fees of \$3,795 — a figure that clearly does not reflect the \$30,000-plus legal expense. Petition ¶ 30. In the same fiscal year, the Corporation's member-facing FY25 Impact Report, signed by the same officer, acknowledged "\$48,000 in unbudgeted board incurred expenses" and a decision to "draw funds from reserve ... to cover unplanned board expenses." Petition ¶ 29; Verified Petition Ex. 18. Petitioner does not ask the Court, on this Application, to reconcile those figures. The point for scheduling is forward-looking: the accounting records the Corporation has refused are what would show how a CEO-directed legal expense exceeding her own spending authority was carried on the books and reported to the federal government — and the question recurs, because the Corporation is by all public indication continuing

2 to incur outside legal fees in the current fiscal year, and the FY26 return, signed by the same officer
3 within months of fiscal-year close, will present the same line-11b choice. That inquiry is meaningful
4 only while the FY26 books remain open. The June 30, 2026 fiscal year-end is the Corporation's own,
5 not a deadline manufactured for this action, and it is weeks away.

6 **B. The Corporation is taking action through a Board whose composition is disputed,**
7 **which the Corporation has not confirmed to its members, and whose post-election decisions**
8 **appear in no available record.**

9 The corporate action described in Section IV.A is being taken by a Board whose composition
10 is actively disputed: the Corporation declined to seat directors the membership elected in the 2026
11 election, and the membership voted to remove directors who remain seated. The Corporation has not
12 fully identified that Board's composition to its members, and declined to confirm the factual basis for
13 seating in response to a direct member request. Together these establish that the contested governance
14 question is not abstract — it goes to whether the body now committing the Corporation to contracts,
15 including, potentially, a multi-year executive contract, holds the authority to do so.

16 **The directors the Corporation declined to seat.** The Board-composition dispute begins with
17 the 2026 election itself. The Corporation placed candidates Barclay Moore, Bryan Martel, and Alycia
18 Glines on its own ballot, and the certified election results identified Moore in first place and Martel in
19 second among the elected candidates. Verified Petition ¶ 33. After voting closed and the results issued,
20 the Corporation issued disciplinary notices purporting to suspend those candidates and declined to seat
21 them — notwithstanding the Corporation's own acknowledgment, in member information sessions
22 and its published election FAQ, that all candidates were members in good standing throughout the
23 voting period. *Id.* Whether the Corporation may decline to seat duly elected directors on the basis of
24 post-election discipline is a central dispute in the related *Moore* action.

2 **The membership's formal repudiation.** On April 23, 2026, at a special meeting, the
3 membership adopted binding resolutions by overwhelming margins, including resolutions individually
4 removing each of the five then-seated directors under California Corporations Code § 7222 — each
5 removal carried by a margin exceeding eighty-four percent. The official tabulated results of that
6 meeting are part of the public record in the related *Moore* action, authenticated by sworn declaration
7 filed April 24, 2026, and Petitioner respectfully requests that the Court take judicial notice of those
8 filed results under California Evidence Code § 452(d). See Declaration of Barclay Moore, filed April
9 24, 2026, *Moore et al. v. PSIA-AASI Western Division*, No. 26CV009976, & Ex. 1 thereto. The dispute
10 over whether the Corporation is bound by those results is a further subject of the related *Moore* action
11 now pending before this Department.

12 **The composition the Corporation has not confirmed, and declined to confirm on request.**
13 The Corporation's public roster identifies seven directors by name and includes two blank rows in the
14 same format, without stating how many seats exist, who holds the open positions, or when they will
15 be filled. Its most recent comprehensive governance communication, the May 13, 2026 Official Board
16 Update, names five officers but no other directors. Monahan Decl. ISO Ex Parte ¶¶ 4, 6 & Ex Parte
17 Ex. 1; Petition Ex. 10. Neither, alone or together, confirms full Board composition to members. When
18 Petitioner asked directly — on May 7, 2026, requesting the specific seat, date, and corporate authority
19 for each currently-seated director, the resignation dates of those who had stepped down since March
20 1, 2026, and the vote details for each post-April 23 appointment — the Corporation provided no
21 answer. Monahan Decl. ISO Ex Parte ¶ 10 & Ex Parte Ex. 5. Without that information, no member
22 can determine from public sources whether the body now taking corporate action holds the authority
23 of a complete and properly constituted Board.

2 **The decisions that appear in no available record.** Both demands seek the corporate records
3 underlying these governance decisions — the Board and committee minutes, the 2026 election
4 eligibility determinations, the disciplinary actions affecting Board composition, and the conflict-of-
5 interest and seating determinations bearing on the May 13 Update's stated seating standard. Petition
6 Exs. 1, 4; Verified Petition ¶¶ 14–21. Yet the Corporation's publicly-accessible minutes archive
7 contains no record of the post-election Board meetings at which the contested decisions occurred: the
8 most recent in-person minutes posted are from the April 28–29, **2025** Spring Board Meeting (a year
9 before the contested 2026 meeting), and the most recent conference-call minutes are from March 25,
10 2026. Monahan Decl. ISO Ex Parte ¶ 18 & Ex Parte Ex. 7. The May 27 production confirmed the gap,
11 containing no minutes for the April 28–29, 2026 Spring Board Meeting, none for any Board meeting
12 after March 25, 2026, and no committee minutes at all. Monahan Decl. ISO Ex Parte ¶¶ 15–16. The
13 body whose composition is disputed, and whose post-election decisions appear in no record available
14 to members, is the same body now positioned to commit the Corporation to the multi-year executive
15 contract described in Section IV.A. The records that would show what it has done, and whether it had
16 authority to do it, are the records demanded and withheld.

17 **C. The Corporation's non-response is part of a documented pattern that culminated, on**
18 **the day of personal service, in an illusory production and an express categorical refusal.**

19 The Corporation's failure to comply with the demands is part of a documented pattern of non-
20 response to member inquiries that predates this action. In April 2026, Petitioner submitted two written
21 questions to the Corporation's Deputy Director regarding the Corporation's compliance with its own
22 governance manuals and with the Corporations Code provisions governing member discipline. The
23 Deputy Director acknowledged the questions at the April 21, 2026 member information session and
24 committed to respond, but no response was provided. A written follow-up nine days later drew no

2 response, and the questions went unaddressed at a second session on May 6, 2026. Monahan Decl.
3 ISO Ex Parte ¶¶ 7–9 & Ex Parte Exs. 3–4. The same pattern carried through the statutory demands
4 and the post-filing communications described in Section II: silence through the response windows, a
5 vague May 24 commitment that contained no date, and no further word until the Corporation's May
6 27 response — delivered one hour and nineteen minutes after personal service. Monahan Decl. ISO
7 Ex Parte ¶¶ 11–15.

8 That response had two components, each independently problematic. **First**, the 694-page
9 production consisted entirely of documents already publicly available on the Corporation's own
10 website and publicly-accessible Google Drive folders before transmission. No document in it required
11 any § 8333 demand to obtain. Monahan Decl. ISO Ex Parte ¶ 15 & Ex Parte Ex. 9. That is not
12 compliance with a statutory inspection right but a non-response packaged to look like one. **Second**,
13 the letter expressly refused three categories of records spanning the substantively-relevant portions of
14 the demands — "all the minutiae of the organization's financials outside of the annual accounting
15 books; draft agendas, minutes, documents or anything outside of the final board minute records; or the
16 CEO's compensation, hiring, and annual review records" — citing no statute, case, or other authority.
17 Monahan Decl. ISO Ex Parte ¶ 16 & Ex Parte Ex. 9 at 9. The records thereby withheld include the
18 committee minutes (Compensation, CEO Evaluation, Conduct, Governance, and Finance
19 Committees), the draft minutes of the April 28–29, 2026 Spring Board Meeting at which directors
20 were reportedly seated, written consents under Bylaws § 9.13 and Cal. Corp. Code § 7211(b), the
21 accounting books and records below the annual-summary level, and the drafts and any final agreement
22 concerning the February 28, 2026 multi-year executive contract. Monahan Decl. ISO Ex Parte ¶ 16.

23 These records fall within Cal. Corp. Code § 8333 on its face, which authorizes member
24 inspection of "the accounting books and records and minutes of proceedings of the members and the

board *and committees of the board.*" As to the committee minutes, the Corporation's refusal is contradicted by its own letter: the May 27 letter quotes the relevant statutory language on its first page, then on its final page refuses "anything outside of the final board minute records" on the asserted ground that there is "no legal authority supporting a member's interest in" such records. Ex Parte Ex. 9 at 1, 9. The committee minutes the Corporation withholds are named in the very statutory sentence it quoted eight pages earlier. Whether § 8333 reaches the refused records is the dispute this proceeding exists to resolve, and the records bearing on it remain perishable: the fiscal-year-end deadline of June 30, 2026 is rapidly approaching, and the contested governance decisions taken at the unrecorded April 28–29, 2026 Spring Board Meeting continue to govern the Corporation's affairs. Expedited scheduling is the proportionate response.

D. The Corporation's response confirms that the contested issue is narrow and that compliance imposes no undue burden.

Two features of the Corporation's May 27, 2026 response confirm that expedited adjudication is appropriate and that compliance would impose no undue burden on the Corporation.

First, the Corporation has not contested the propriety of any purpose stated in either demand. The May 27 letter recites Petitioner's stated purposes — including her interest in the validity of the 2026 Board election, the procedural basis for disciplinary actions affecting Board composition, the pattern of director resignations, the Corporation's application of its own governance manuals to financial controls and expenditure authorization, the consistency between the Corporation's books and the representations made in its Form 990, and the Corporation's contemporaneous authorization and ongoing review of Chief Executive Officer compensation — and does not argue that any of these purposes is improper, is not reasonably related to Petitioner's interests as a member, or is pretextual. Ex Parte Ex. 9 at 6, 9. The Corporation contests only whether Petitioner has, in its words, "legal

2 authority supporting a member's interest in" three categories of records. *Id.* at 9. That is a contention
3 directed to the scope of § 8333, not to Petitioner's standing or purpose. The narrowness of the contested
4 issue makes it well suited to resolution on the expedited schedule Petitioner requests.

5 Second, compliance would impose no undue burden, because the Corporation maintains its
6 records electronically in cloud-based platforms. The Corporation transmitted its entire 694-page
7 Bates-stamped May 27 production through a Dropbox link within roughly eighty minutes of being
8 served. Monahan Decl. ISO Ex Parte ¶ 16. It stores corporate records — including Board minutes, 990
9 tax filings, financial reports, and impact reports — in publicly-accessible Google Drive folders linked
10 from its own website. *Id.* ¶¶ 14, 16–17. And its own Board minutes describe maintaining board records
11 through a Basecamp workspace and an internal "BoD Google Drive." *Id.* ¶ 15. The records Petitioner
12 seeks are, by the Corporation's own demonstrated practice, already digitized and organized in
13 shareable electronic form. Expedited production therefore imposes no meaningful logistical burden.

14 V. NOTICE

15 Petitioner has given the Corporation notice of this Ex Parte Application in compliance with
16 California Rules of Court 3.1203 and 3.1204. The particulars of notice — the date, time, channels, and
17 recipients of notice, and any response received — are set forth in the Declaration of Alison Monahan
18 in Support of Ex Parte Application, immediately following.

2 **VI. CONCLUSION**

3 For the reasons set forth above, Petitioner respectfully requests that the Court grant this Ex
4 Parte Application and enter the proposed Order to Show Cause and Order Shortening Time submitted
5 herewith.

6 DATED: May 28, 2026.

7 

8 Alison Monahan, Petitioner

9 In Propria Persona

10

DECLARATION OF ALISON MONAHAN IN SUPPORT OF EX PARTE APPLICATION

I, ALISON MONAHAN, declare:

¶ 1. I am the Petitioner in this proceeding. I am over the age of 18. I reside in San Francisco, California. I make this declaration in support of my Ex Parte Application for (1) Order to Show Cause; (2) Order Shortening Time; and (3) Directions for Service in this action. The facts stated in this declaration are within my personal knowledge. If called as a witness, I could and would competently testify to them.

¶ 2. I am an inactive member of the State Bar of California (Bar No. 261991). I appear in propria persona in this proceeding.

¶ 3. The substantive facts underlying this Ex Parte Application — the service of the May 12, 2026 and May 13, 2026 demands, the channels and timing of service, the Corporation's non-response, and the authentication of Petition Exhibits 1 through 18 — are set forth in my Declaration in Support of Verified Petition for Order Compelling Inspection of Corporate Records under California Corporations Code § 8336, filed in this action on May 21, 2026. I incorporate that declaration by reference. The exhibits authenticated below are additional exhibits supporting this Ex Parte Application and are numbered separately as "Ex Parte Exhibits."

Authentication of Ex Parte Exhibits

¶ 4. Attached as **Ex Parte Exhibit 1** are true and correct copies of (a) a screenshot I captured on May 24, 2026 of the page on the Corporation's website titled "Our Western Team," at the URL psia-w.org/home/about/our-team/, including the "Board of Directors" section listing the Corporation's currently-displayed Board of Directors; and (b) the Internet Archive Wayback Machine capture of the same URL on May 24, 2026 at 18:02:31 UTC, preserved at web.archive.org/web/20260524180231/https://psia-w.org/home/about/our-team/#tab-id-4. The

"Board of Directors" section identifies seven directors by name, each with role, certifications, and member-since year: Sowmya Subramanian (Chairwoman), Thomas Powell (Vice Chair), Sue Spain (Treasurer), Julie Brown (Secretary), Neil Bussiere (Director, Nat'l Rep), Meghan Ochs (Director), and Brent Boblitt (Director). Immediately below the seven named directors, the "Board of Directors" section contains two additional rows in the same format that are blank — no name, role, certifications, or member-since year is shown for either row. The page does not state how many Board seats exist in total, why the additional rows are blank, who (if anyone) currently holds the open positions, or when those positions will be filled. I reviewed the same page again on May 28, 2026, and the "Board of Directors" section remained unchanged from the May 24, 2026 capture attached hereto.

¶ 5. Attached as **Ex Parte Exhibit 2** are true and correct copies of (a) a screenshot I captured on May 20, 2026 at approximately 6:56pm PM Pacific Time of the page on the Corporation's website at the URL psia-w.org/home/about/#tab-id-6, identified as "BOARD MEETINGS," which directs members seeking to correspond with the Board: "In order to attend as a guest at a Western Board Meeting, please email the Board of Directors at WesternBOD@psia-w.org," and further: "QUESTIONS: Please email the Board of Directors at westernBOD@psia-w.org"; and (b) the Internet Archive Wayback Machine capture of the same URL on May 21, 2026 at 05:03:05 UTC, preserved at web.archive.org/web/20260521050305/https://psia-w.org/home/about/#tab-id-6. The page is the Corporation's published direction to its members on the channel for member-to-Board correspondence.

Corporation's Communications Concerning Board Composition

¶ 6. The May 13, 2026 Official Board Update authenticated and attached as Exhibit 10 to my Declaration in Support of Verified Petition is the Corporation's most recent comprehensive public communication regarding its governance known to me. *See* Monahan Decl. ¶ 14. The May 13 Board Update identifies the Corporation's officer positions for the 2026–27 term — listing five individuals

2 as Chair, Vice Chair, Secretary, Treasurer, and National Representative — but does not identify any
3 other director on the Board of Directors. Together with the publicly displayed Board roster
4 authenticated in paragraph 4 above, the May 13 Board Update does not provide a complete
5 identification of current Board composition. As of the date of this declaration, the Corporation has not,
6 through any channel known to me, identified who holds the positions reflected as blank on its publicly
7 displayed Board roster, identified any directors not addressed in the May 13 Board Update, or stated
8 when those positions will be filled.

9 **Pattern of Non-Response to Member Inquiries**

10 ¶ 7. On April 20, 2026, I emailed Lynnea Anderson at landerson@thesnowpros.org — the
11 Corporation's Deputy Director — submitting two written questions regarding the Corporation's
12 compliance with its own Policies and Procedures Manual and with California Corporations Code
13 provisions governing the procedures applicable to member discipline. I sent the questions in advance
14 of a member information session the Corporation was hosting the following day. Attached as **Ex Parte**
15 **Exhibit 3** is a true and correct copy of that email.

16 ¶ 8. I attended the Corporation's member information session on April 21, 2026. During that
17 session, Ms. Anderson acknowledged receipt of my questions and stated that responses would be
18 provided. My contemporaneous transcript of the April 21, 2026 session is part of Exhibit 16 to my
19 Declaration in Support of Verified Petition.

20 ¶ 9. On April 29, 2026, having received no response to my April 20 questions, I emailed Ms.
21 Anderson again to follow up. I noted that no response had been received despite the commitment made
22 at the April 21 session. Attached as **Ex Parte Exhibit 4** is a true and correct copy of that follow-up
23 email. The Corporation hosted a second member information session on May 6, 2026, which I also
24 attended live via Zoom. My contemporaneous transcript of the May 6, 2026 session is part of Exhibit

16 to my Declaration in Support of Verified Petition. The April 20 questions identified in paragraph 7 above were not addressed or answered at the May 6, 2026 session. As of the date of this declaration, no substantive response to either of my April 20 questions has been received from Ms. Anderson or from any other representative of the Corporation.

¶ 10. On May 7, 2026, at 4:59 p.m. Pacific Time, following a telephone conversation earlier that day, I sent an email to Dan Stormer of Hadsell Stormer Renick & Dai LLP, counsel of record for the Corporation in the related action *Moore et al. v. PSIA-AASI Western Division*, Sacramento Superior Court Case No. 26CV009976. In that email I asked the Corporation to confirm in writing the factual basis on which each currently-seated director then identified on the Corporation's public website holds office — the specific seat each director occupies, the date each took that seat, and the corporate authority for the appointment, election, or other basis for service — together with the resignation dates of directors who had stepped down since March 1, 2026 and, for each director appointment or reappointment made after April 23, 2026, the number of directors voting to approve it and the directors voting in favor, abstaining, recused, or absent. I described these as factual questions that did not require legal characterization. In the same email I asked the Corporation, as a condition of a requested extension of time for its substantive response, to commit to a pause on binding non-routine board action and to announce that pause to the membership. On May 12, 2026, Mr. Stormer responded. The substantive content of his response was, in its entirety: "We will not be able to accede to your time constraints [sic]." The Corporation did not answer the factual questions concerning the basis for each director's seat, and did not commit to refrain from non-routine board action during the requested period. Attached as **Ex Parte Exhibit 5** are true and correct copies of my May 7, 2026 email and Mr. Stormer's May 12, 2026 response.

¶ 11. On May 22, 2026, the day after the Verified Petition in this action was filed, I provided written notice of the filing through two channels. At 11:32 a.m. Pacific Time, I served by electronic mail the Notice of Related Case identifying this action as related to *Moore et al. v. PSIA-AASI Western Division*, No. 26CV009976 (filed with the Court on May 21, 2026 pursuant to California Rules of Court 3.300) on counsel of record in the related *Moore* action — addressed to Dan Stormer at dstormer@hadsellstormer.com, with copies to Bina Ahmad at bahmad@hadsellstormer.com and Isabelle Geczy at igeczy@hadsellstormer.com, all of Hadsell Stormer Renick & Dai LLP. At 12:24 p.m. Pacific Time the same day, I emailed the Corporation at its published institutional channels — westernBOD@psia-w.org and mcooper@thesnowpros.org — to provide notice that the Verified Petition had been filed and to attach a file-stamped copy. Attached as **Ex Parte Exhibit 6** are true and correct copies of both transmittals. As of the date of this declaration, no substantive response has been received from any of these recipients other than the May 24, 2026 communication from Ms. Ahmad described in paragraph 12 below and the May 27, 2026 letter described in paragraph 15 below.

Communication from Counsel, Personal Service, and May 27, 2026 Response

¶ 12. On May 24, 2026, at 5:25 p.m. Pacific Time, I received an email from Bina Ahmad of Hadsell Stormer Renick & Dai LLP — counsel of record for the Corporation in the related action *Moore et al. v. PSIA-AASI Western Division*, Sacramento Superior Court Case No. 26CV009976. Ms. Ahmad identified herself as "one of the attorneys representing PSIA-AASI Western" and stated that the firm was "reviewing" my May 12 and May 13 demand letters and would "respond to these letters in the next few days." Ms. Ahmad did not specify a date by which the response would be provided, did not commit to a date for the production of records, did not address the scope of either demand, and did not articulate any position regarding any relief sought in this action.

¶ 13. At 5:34 p.m. Pacific Time on the same day, May 24, 2026, I responded to Ms. Ahmad's email, copying Mr. Stormer. My response stated, in its entirety: "Please provide an exact timeframe for your response, as I plan to effect service on Tuesday morning, and file an ex parte motion as soon as service on the Corporation is complete." Attached as **Ex Parte Exhibit 8** is a true and correct copy of the May 24, 2026 email exchange between Ms. Ahmad and me, including both her message and my response. Ms. Ahmad did not respond to my request for an exact timeframe, and I received no further communication from Ms. Ahmad, Mr. Stormer, or anyone else at Hadsell Stormer Renick & Dai LLP before service was completed.

¶ 14. On May 27, 2026, at approximately 3:26 p.m. Pacific Time, the Summons, Verified Petition, Declaration of Alison Monahan in Support of Petition, Exhibits 1 through 18 to that Declaration, Notice of Related Case, Civil Case Cover Sheet, and Proposed Order Granting Petition were personally served on the Corporation through its designated agent for service of process under California Code of Civil Procedure § 416.10 — Registered Agents Inc, 1401 21st Street, Suite R, Sacramento, California 95811.

¶ 15. On May 27, 2026, at 4:45 p.m. Pacific Time — one hour and nineteen minutes after the personal service described in paragraph 14 above was effected — I received an email from WesternBOD@psia-w.org ("Western Board") transmitting a 9-page letter dated May 27, 2026 on PSIA-AASI Western Division letterhead, signed "PSIA-AASI West Board of Directors." Despite the signature block identifying "PSIA-AASI West Board of Directors" as the author, the opening paragraph of the letter reads: "We represent the Professional Ski Instructors of America-Western Division. We have reviewed your May 12 and May 13, 2026 written requests for records, as well as your lawsuit against our clients, *Monahan v. Professional Ski Instructors of America-Western Division*, Case No. 26CV012327. We write in response to your May 12 and May 13, 2026 records

requests." The transmittal email contains a Dropbox link to a folder titled MONAHAN 000001 – MONAHAN 000694.prod 05-27-26, organized into eighteen numbered sub-folders corresponding to the eighteen categories of documents identified at pages 8 and 9 of the letter. The folder contains 694 sequentially Bates-stamped pages. I have reviewed every document in the production and compared each against the documents publicly accessible from the Corporation's website at psia-w.org/home/about (including the dedicated tabs for Code of Conduct, Strategic Goals, Impact Reports, 990 Tax Returns, Financial Reports, ESG Policy, Disciplinary Policy, Privacy Policy, Affiliation Agreement, and Board Meetings), from the publicly-accessible Google Drive folders linked from those tabs (including the Corporation Minutes Archive described in paragraphs 17 and 18 below and the corresponding 990 Tax Returns folder and Impact Reports folder), from the Corporation's National affiliate at thesnowpros.org, and from federal and state public-disclosure channels for the Corporation's tax filings. Every document in the May 27, 2026 production was publicly available from one or more of these sources before the production was transmitted. By way of a single specific example, the IRS Form 8868 Extension produced in the 990 Tax Returns sub-folder had been uploaded to the publicly-accessible Google Drive "990 Tax Returns" folder linked from psia-w.org/home/about on November 10, 2025 — over six months before the production. To preserve the publicly-accessible state of the Corporation's principal source folders contemporaneously with the issuance of this Application, on May 27, 2026 (the same day as the production) I caused the Internet Archive Wayback Machine to capture the following public-facing resources from which the production materials were drawn:

- (a) The "990 Tax Returns" tab on the Corporation's website at psia-w.org/home/about/#tab-id-9, captured May 28, 2026 at 01:21:05 UTC and preserved at web.archive.org/web/20260528012105/https://psia-w.org/home/about/;

(b) The Corporation's publicly-accessible "990 Tax Returns" Google Drive folder (folder ID 18nGDTdmYWbQNPCelnEouQoB4Qt8Riu5l), captured May 28, 2026 at 01:24:03 UTC and preserved at web.archive.org/web/20260528012403/https://drive.google.com/drive/folders/18nGDTdmYWbQNPCelnEouQoB4Qt8Riu5l; and

(c) The Corporation's publicly-accessible "Impact Reports" Google Drive folder (folder ID 11k9yQd_JXnOOOy-ymMM5g_5c2ib-mHAa), captured May 28, 2026 at 01:21:58 UTC and preserved at web.archive.org/web/20260528012158/https://drive.google.com/drive/folders/11k9yQd_JXnOOOy-ymMM5g_5c2ib-mHAa.

Together with the Wayback Machine captures of the Board Meetings page and the Corporation Minutes Archive identified in paragraphs 17 and 18 below (all captured May 24, 2026, three days before the production), these captures preserve the publicly-accessible state of the principal source materials reflected in the May 27, 2026 production, including the Board minutes (Corporation Minutes Archive identified in paragraphs 17 and 18 below), 990 tax filings (Drive folder identified in (b) above), and Impact Reports (Drive folder identified in (c) above). The Corporation maintains its corporate records in electronic, cloud-based form. In addition to transmitting the May 27 production through a Dropbox link and maintaining the publicly-accessible Google Drive folders described above, the Corporation's own April 28–29, 2025 Board Meeting minutes — which are publicly available in the Corporation Minutes Archive and were included in the May 27 production — state that the Corporation's Secretary ensures that directors are "properly notified through Basecamp and the BoD Google Drive on updates," reflecting the Corporation's use of both a Basecamp workspace and an internal Board of Directors Google Drive to maintain board records. Attached as **Ex Parte Exhibit 9**

are true and correct copies of the May 27, 2026 letter and the transmittal email. On May 27, 2026, at 5:29 p.m. Pacific Time, I sent an email to Mr. Stormer with the subject "Representation in 26CV012327 / ex parte notice channel," requesting that he confirm (1) whether Hadsell Stormer Renick & Dai LLP represents the Corporation in this action and (2) if so, the email address(es) at which notice of the ex parte application should be sent. I noted in that email that no notice of appearance had been filed on behalf of the Corporation in this action. Attached as **Ex Parte Exhibit 10** is a true and correct copy of that email. On May 28, 2026, at 3:56 p.m. Pacific Time, Mr. Stormer responded by email, copying Ms. Ahmad, Tami Galindo, and Juan Aviles of his firm. Mr. Stormer wrote that "it appears that my firm will be representing PSIA/AASI W in the lawsuit which you have filed" and directed that communications be made through four email addresses: bahmad@hadsellstormer.com, dstormer@hadsellstormer.com, tgalindo@hadsellstormer.com, and javiles@hadsellstormer.com. Attached as **Ex Parte Exhibit 12** is a true and correct copy of Mr. Stormer's May 28, 2026 email and my May 27, 2026 email to which it responded. As of the time of execution of this declaration, no notice of appearance has been filed on behalf of the Corporation in this action, and no answer or other responsive pleading has been filed.

¶ 16. The May 27, 2026 letter at page 9 expressly refuses to produce three additional categories of records demanded in the May 12 and May 13 demand letters. The letter states: "we can find no legal authority supporting a member's interest in and request for all the minutiae of the organization's financials outside of the annual accounting books; draft agendas, minutes, documents or anything outside of the final board minute records; or the CEO's compensation, hiring, and annual review records." The letter cites no statute, case, or other legal authority for these refusals. The records the Corporation thereby refuses to produce include, by way of example: minutes of any Board committee, including the Compensation Committee, the CEO Evaluation Committee, the CEO Transition Team,

the Conduct Committee, the Governance Committee, and the Finance Committee; minutes of the Corporation's Spring Board Meeting held April 28–29, 2026 at Mammoth Mountain at which directors were reportedly seated, to the extent those minutes are still in draft; written consents and unanimous-consent actions under Bylaws § 9.13 and Cal. Corp. Code § 7211(b); Treasurer reports and Finance Committee reports; the August 11, 2022 offer letter under which the Corporation's Chief Executive Officer is currently employed; all Compensation Committee work product, including comparability data; all CEO Evaluation Committee work product; all records substantiating the contemporaneous-deliberation representations made by the Corporation's Chief Executive Officer under penalty of perjury on each annual Form 990 at Part VI Section B Line 15a; general ledger entries, invoices, bank statements, and other accounting books and records below the annual-summary level; Form 990 preparer workpapers and reconciliations; and any drafts, term sheets, or final agreements concerning the multi-year employment contract for the Chief Executive Officer and Deputy Director authorized by the Corporation's Board on February 28, 2026.

Corporation Minutes Archive

¶ 17. The Corporation maintains a publicly accessible meeting-minutes archive linked from its Board Meetings page at psia-w.org/home/about/#tab-id-6. The Board Meetings page directs members: "Use this LINK to access minutes from the Board of Directors meetings. These minutes have been approved by the Western Region Board of Directors." The hyperlink target is a Google Drive folder at drive.google.com/drive/folders/1oZosL6mNj8x128KwpN9YdVFYM9kqs4wC (the "Corporation Minutes Archive"). The Corporation Minutes Archive contains subfolders for each fiscal-year season — "20-21 Meeting Minutes (Board Zoom Calls)" through "25-26 Meeting Minutes (Board Zoom Calls)" — and a separate subfolder titled "In Person or major Zoom Board Meetings."

¶ 18. Attached as **Ex Parte Exhibit 7** are true and correct copies of screenshots I captured on May 24, 2026 of (a) the Corporation's Board Meetings page at psia-w.org/home/about/#tab-id-6; (b) the root of the Corporation Minutes Archive at the Google Drive URL identified in paragraph 17; (c) the "In Person or major Zoom Board Meetings" subfolder of the Corporation Minutes Archive; and (d) the "25-26 Meeting Minutes (Board Zoom Calls)" subfolder of the Corporation Minutes Archive. Internet Archive Wayback Machine captures of the same four URLs, all dated May 24, 2026, are preserved at the following URLs and are also included in Ex Parte Exhibit 7:

(i) Board Meetings page (captured May 24, 2026 at 17:59:35 UTC):

web.archive.org/web/20260524175935/https://psia-w.org/home/about/#tab-id-6

(ii) Root of the Corporation Minutes Archive (captured May 24, 2026 at 22:43:50 UTC):

web.archive.org/web/20260524224350/https://drive.google.com/drive/folders/1oZosL6mNj8x128KwpN9YdVFYM9kqs4wC

(iii) "In Person or major Zoom Board Meetings" subfolder (captured May 24, 2026 at 22:42:56 UTC):

web.archive.org/web/20260524224256/https://drive.google.com/drive/folders/1pDfOaVM4ywxptf6KoN1bLseALYnU1Geu

(iv) "25-26 Meeting Minutes (Board Zoom Calls)" subfolder (captured May 24, 2026 at 22:41:01 UTC):

web.archive.org/web/20260524224101/https://drive.google.com/drive/folders/1pC6by-7WJh7VO2MzDqB1aIJxZfc3g6lk

As reflected in those screenshots and Wayback captures, as of May 24, 2026:

(a) The "25-26 Meeting Minutes (Board Zoom Calls)" subfolder — the current-season subfolder for Board conference-call minutes — contains minutes for meetings held through

2 March 25, 2026. The most recent meeting for which minutes are posted in that subfolder
3 is the Board conference call of March 25, 2026. No minutes have been posted to that
4 subfolder for any Board conference-call meeting held after March 25, 2026.

5 (b) The "In Person or major Zoom Board Meetings" subfolder contains minutes for meetings
6 held through April 28–29, 2025. The most recent meeting for which minutes are posted in
7 that subfolder is the Spring 2025 Board Meeting held April 28–29, 2025. No minutes have
8 been posted to that subfolder for the Corporation's Spring 2026 Board Meeting held April
9 28–29, 2026 at Mammoth Mountain, despite the Corporation's representation in the May
10 13, 2026 Official Board Update — attached as Exhibit 10 to my Declaration in Support of
11 Verified Petition — that "newly elected board members were officially seated" at "the
12 recent in-person Spring Board Meeting at Mammoth Mountain."

13 (c) The Corporation's Board Meetings page states that "Board Meetings are held online the
14 second Monday of the month from 5 pm to 7 pm (excluding holidays)." The second
15 Mondays in April and May 2026 fell on April 13, 2026 and May 11, 2026 respectively. No
16 minutes have been posted to the Corporation Minutes Archive for any meeting held on
17 either date.

18 **Notice of Ex Parte Application**

19 ¶ 19. The Corporation is represented in this action by Hadsell Stormer Renick & Dai LLP. On
20 May 28, 2026, Dan Stormer confirmed by email that his firm will represent the Corporation in the
21 lawsuit Petitioner has filed and directed that communications be sent to the four firm email addresses
22 identified in paragraph 20(a) below. *See* ¶ 15 above & Ex Parte Ex. 12. As of the time of execution of
23 this declaration, no notice of appearance has been filed on behalf of the Corporation in this action. On
24 May 28, 2026, at approximately 11:40 PM Pacific Time, I gave written notice of this Ex Parte

Application to counsel for the Corporation and to the Corporation through its published institutional channels, in accordance with California Rules of Court 3.1203 and 3.1204. The notice provided (a) the date, time, and department of the ex parte hearing; (b) the nature of the relief requested in this Application; and (c) advance copies of the papers being filed in support of the Application.

¶ 20. The notice was transmitted through the following channels:

- (a) **By electronic mail to counsel for the Corporation**, Bina Ahmad, Dan Stormer, Tami Galindo, and Juan Aviles of Hadsell Stormer Renick & Dai LLP, at bahmad@hadsellstormer.com, dstormer@hadsellstormer.com, tgalindo@hadsellstormer.com, and javiles@hadsellstormer.com; and
- (b) **By electronic mail to the Corporation** at westernBOD@psia-w.org (the Corporation's published Board correspondence address, as identified in Ex Parte Exhibit 2) and mcooper@thesnowpros.org (the Corporation's Chief Executive Officer).

¶ 21. As of the time of execution of this declaration:

- (a) I have not received any response, objection, opposition, or acknowledgment of notice from the Corporation, from any officer or director of the Corporation, from any employee of the Corporation, from the Corporation's counsel, Hadsell Stormer Renick & Dai LLP, or from any other person purporting to act on behalf of the Corporation.
- (b) I have not received any bounce-back message, non-delivery notification, automated out-of-office reply, error report, or other system response with respect to the electronic mail transmittals identified in paragraph 20 above.

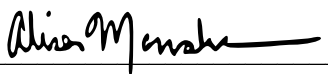
2 **Certified Mailings**

3 ¶ 22. As set forth in my Declaration in Support of Verified Petition, I transmitted each of the
4 May 12, 2026 and May 13, 2026 demands to the Corporation's designated mailing address by United
5 States Certified Mail, Return Receipt Requested, in addition to the electronic-mail channels. *See*
6 Monahan Decl. ¶¶ 10–18. On May 28, 2026, I reviewed the United States Postal Service tracking
7 records for both certified mailings at tools.usps.com. As reflected in those records: the May 12
8 Demand mailing (tracking number 70223330000113464454) showed status "Available for Pickup" at
9 the Truckee, California post office as of May 15, 2026, and the May 13 Supplemental Demand mailing
10 (tracking number 9589071052702362695198) showed status "Available for Pickup" at the same post
11 office as of May 18, 2026. Each tracking record further reflects that, at 2:10 p.m. on May 28, 2026,
12 the item was picked up at the post office in Truckee, California. The tracking records do not identify
13 the individual who picked up either item. I have requested but not yet received the signed return-
14 receipt cards for the two certified mailings, which are returned by mail; I will supplement this record
15 with the signed return receipts when they are received. Attached as **Ex Parte Exhibit 11** are true and
16 correct copies of the two USPS tracking records I captured on May 28, 2026.

17 **Attestation**

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

20
21 Executed on May 28, 2026, at San Francisco, California.

22 

23 Alison Monahan, Petitioner

24 In Propria Persona

2
3
4
5
**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SACRAMENTO**

ALISON MONAHAN,

Petitioner,

v.

PROFESSIONAL SKI INSTRUCTORS OF
AMERICA – WESTERN DIVISION, a
California nonprofit mutual benefit
corporation,

Respondent.

Case No. 26CV012327

[PROPOSED] ORDER TO SHOW CAUSE
AND ORDER SHORTENING TIME

6
7 Petitioner Alison Monahan's Ex Parte Application for (1) Order to Show Cause; (2) Order
8 Shortening Time; and (3) Directions for Service came on for hearing on June 1, 2026, in Department
9 8D of this Court. Petitioner appeared in propria persona. [The Corporation appeared / did not appear /
10 appeared specially by counsel: _____.] The Court, having considered the Verified Petition
11 and supporting papers, the Ex Parte Application and supporting papers, and the argument of Petitioner
12 [and the Corporation], and good cause appearing,

13 HEREBY ORDERS AS FOLLOWS:

14 **Order to Show Cause issued.** Respondent Professional Ski Instructors of America-Western
15 Division (the "Corporation") is hereby ordered to show cause why an order should not be
16 entered compelling the Corporation to produce to Petitioner the records demanded in
17 Petitioner's May 12, 2026 demand under California Corporations Code § 8333 (Petition
18 Exhibit 1) and Petitioner's May 13, 2026 supplemental demand under the same section
19 (Petition Exhibit 4).

20 **Hearing date.** The hearing on this Order to Show Cause is set for [DATE], 2026, at [TIME], in
21 Department 8D of this Court.

2 **Shortened time for response and reply.**

3 (a) The Corporation's written response to the Order to Show Cause and to the Verified Petition
4 shall be filed with the Court and served on Petitioner no later than five (5) court days before
5 the hearing date set in paragraph 2 above.

6 (b) Petitioner's reply, if any, shall be filed with the Court and served on the Corporation no
7 later than two (2) court days before the hearing date set in paragraph 2 above.

8 **Service of this Order.** Petitioner shall serve this Order on the Corporation through the following
9 channels, on or before June 3, 2026:

10 (a) on counsel for the Corporation, Bina Ahmad, Dan Stormer, Tami Galindo, and Juan
11 Aviles of Hadsell Stormer Renick & Dai LLP, by electronic mail to
12 bahmad@hadsellstormer.com, dstormer@hadsellstormer.com,
13 tgalindo@hadsellstormer.com, and javiles@hadsellstormer.com; and

14 (b) on the Corporation by electronic mail to westernBOD@psia-w.org and
15 mcooper@thesnowpros.org.

16 **Proof of service.** Petitioner shall file proof of service of this Order no later than two (2) court days
17 after service is effected.

18 IT IS SO ORDERED.

19 DATED: [DATE], 2026.

20 _____

21 Judge of the Superior Court