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## Memorandum

**To:** Honorable Chair and Members of the Orange County Sanitation District Board of Directors

**From:** General Counsel

**Date:** February 25, 2026

**Re:** Closed Session Items

The Board will hold a closed session on February 25, 2026, for the purpose of conferring with its legal counsel regarding existing litigation to which the Orange County Sanitation District is a party. The title of the case is BKK Working Group, et al. v. Albertsons Companies, Inc., et al., United States District Court Central District of California, Court Case No. 2:18-CV-05836-MWF(PLAx). The closed session will be held pursuant to the authority of California Government Code section 54956.9(d)(1).

Respectfully submitted,

SCOTT C. SMITH