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*Exempt From Filing Fees Pursuant
To Government Code Section 6103*

Attorneys for Plaintiffs
COUNTY OF FRESNO and THE PEOPLE OF STATE OF CALIFORNIA

SUPERIOR COURT OF CALIFORNIA, COUNTY OF FRESNO

CIVIL DIVISION

COUNTY OF FRESNO; and
THE PEOPLE OF THE STATE OF
CALIFORNIA

Plaintiffs,

v.

ASHOK WADHWA, an individual;
NEELAM WADHWA, an individual;
SWARAN BALL, an individual; MANJIT
BALL, an individual; MIKE BALL, an
individual; PLUS TRANZ, INC., a California
corporation; and DOES 1 through 50,
inclusive,

Defendants.

Case No. 24CECG02246

**STIPULATION FOR ENTRY OF
JUDGMENT AND ORDER THEREON
(Code Civ. Proc. § 664.6)**

**Judge Assigned for All Purposes –
Hon Kristi Culver Kapetan in Dept. 502**

Plaintiffs COUNTY OF FRESNO, a political subdivision of the State of California,
("County") and THE PEOPLE OF THE STATE OF CALIFORNIA, ("People") by and through
The Office of County Counsel for the County of Fresno (collectively, "Plaintiffs"); and
Defendants ASHOK WADHWA, an individual; NEELAM WADHWA, an individual;
SWARAN BALL, an individual; MANJIT BALL, an individual; MIKE BALL, an individual;
PLUS TRANZ, INC., a California corporation, (collectively, "Defendants") desire and hereby

1 agree to resolve the above-captioned matter through this stipulation for entry of judgment as
2 follows:

3 **RECITALS**

4 **WHEREAS**, Defendants own, possess, control and maintain certain real property
5 located at and commonly known as 1270 South Temperance Avenue, Fresno, California 93727,
6 further identified as Assessor's Parcel Number (APN) 316-150-35, and legally described as
7 follows: "The North half of the Southwest Quarter of the Northwest Quarter of Section 14,
8 Township 14 South, Range 21 East, Mount Diablo Base and Meridian, according to the official
9 plat thereof" ("Subject Property").

10 **WHEREAS**, the Subject Property is zoned Exclusive Agriculture under Fresno
11 County Zoning Ordinance, Division 6 of the Fresno Ordinance Code ("Fresno County Zoning
12 Ordinance") section 808.2.A.

13 **WHEREAS**, on or about September 14, 2022, Defendants began to store and park
14 semi-trucks, trailers, and tractor-trailers, and operate a commercial truck yard and truck parking
15 facility on the Subject Property.

16 **WHEREAS**, on May 26, 2023, County of Fresno Code Enforcement staff inspected
17 the Subject Property and observed semi-trucks, trailers and tractor-trailers stored and parked on
18 the Subject Property.

19 **WHEREAS**, the County issued administrative citations and Defendants incurred
20 administrative fines for ongoing violations of the Fresno County Zoning Ordinance.

21 **WHEREAS**, on May 24, 2024, Plaintiffs filed a Complaint for Injunctive Relief and
22 Other Relief to Abate a Public Nuisance, Unfair Business Practices, and Other Relief (the
23 "Complaint").

24 **WHEREAS**, on or about July 15, 2024, service of summons was completed on all
25 Defendants.

26 **WHEREAS**, the Complaint seeks to abate violations of the Fresno County Zoning
27 Ordinance sections 800.1.020.B, 878.6.010, 878.6.020.B, and 878.6.040.A for operation of the
28 vehicle and freight terminal, truck stop, truck parking, and/or commercial truck facility on the

- 1 Property authorizes the Illegal Conditions on the Subject Property.
- 2 B. Defendants shall fully abate all Illegal Conditions on the Subject Property in
- 3 violation of Fresno County Zoning Ordinance sections 800.1.020.B, 878.6.010,
- 4 878.6.020.B, and 878.6.040.A within thirty (30) calendar days after the date of
- 5 service of the Notice of Entry of Judgment and permit reasonable inspection by
- 6 the County to monitor compliance.
- 7 C. If Defendants fail to timely and fully abate any Illegal Condition, as required by
- 8 paragraph 3.B, the County may enter the Subject Property and take all necessary
- 9 actions to fully abate the Illegal Condition.
- 10 D. The County is authorized to enter and inspect the Subject Property, excluding the
- 11 single-family residence, pool, and accessory structures, with at least 24 hours'
- 12 notice by telephone, email, or in-person notification to Defendants, with these
- 13 inspections limited to occur between the hours of 8:00 am and 6:00 pm and only
- 14 on Mondays through Fridays, without a warrant or further orders from this Court
- 15 to monitor compliance with the terms of the judgment entered pursuant to this
- 16 stipulation for a period of three hundred sixty-five (365) calendar days after the
- 17 date of service of the Notice of Entry of Judgment.
- 18 E. The County's authorization to enter the Subject Property to inspect may be
- 19 modified by further orders issued by the Court.
- 20 F. In the event Illegal Conditions are found on the Subject Property, the County will
- 21 provide written notice to Defendants pursuant to paragraph 4.L with a demand to
- 22 abate all noticed Illegal Conditions found on the Subject Property with a cure
- 23 period of fifteen (15) days from the date of mailing of the notice described in this
- 24 paragraph. In the event Defendants fail to fully and timely abate the noticed
- 25 Illegal Conditions, the County is authorized to enter the Subject Property and
- 26 abate the noticed Illegal Conditions and recover the cost of this abatement work
- 27 pursuant to paragraph 4.G.
- 28 G. The County may recover from Defendants, jointly and severally, all of the

1 County's costs incurred in abating any Illegal Condition, and these costs may be
2 secured by a judgment lien, and Defendants shall forfeit all legal right to
3 possession and ownership interest in any materials the County removes from the
4 Property for the purposes of abating the Illegal Condition.

5 H. Defendants agree to a monetary award to be paid exclusively by defendant PLUS
6 TRANZ, INC., in the amount of fifty thousand dollars (\$50,000) to the County to
7 compromise and resolve Defendants' liability for unpaid administrative fines and
8 civil penalties pursuant to California Business and Professions Code section
9 17206.

10 I. The County and Defendants agree that PLUS TRANZ, INC., will satisfy the fifty
11 thousand dollars (\$50,000) monetary award to the County as follows: (i) ten (10)
12 equal installment payments of five thousand dollars (\$5,000); (ii) the first
13 installment of five thousand dollars (\$5,000) is due to the County five (5) court
14 days after the date of service of the Notice of Entry of Judgment pursuant to this
15 stipulation; and (iii) the nine (9) subsequent installment payments of five
16 thousand dollars (\$5,000) are due each ninety (90) calendar days after the due
17 date of the first installment until the full amount of fifty thousand dollars
18 (\$50,000) is paid to the County (as provided in Code Civ. Proc., § 116.620).
19 Payment shall be made by check or money order payable to the "County of
20 Fresno," and delivered to the Office of the Fresno County Counsel, c/o Code
21 Enforcement Attorney, 2200 Tulare Street, 5th Floor, Fresno, California 93721.

22 J. Upon defendant PLUS TRANZ, INC.'S full payment of the fifty thousand dollars
23 (\$50,000) monetary award, the County will file and serve an Acknowledgement
24 of Satisfaction of Judgment, Judicial Council Form EJ-100, as this form may be
25 amended by the Judicial Council.

26 K. If any installment is not paid when due, interest accrues on the unpaid installment
27 at the legal rate for a money judgment (as provided in Code Civ. Proc., § 685.010)
28 beginning on the date the installment becomes due (as provided in Code Civ.

1 Proc., § 685.020). The Parties agree that the Complaint is not a claim related to
2 medical expenses or personal debt. In addition, if any installment is not paid when
3 due, the County may avail itself to the procedures to enforce money judgments
4 under the laws of the State of California, including, but not limited to, a lien on
5 the Subject Property and garnishment of the bank accounts held by PLUS
6 TRANZ, INC. If any installment is not paid when due, a judgment lien on the
7 Subject Property may be enforced for the amount of unmatured installments (as
8 provided in Code Civ. Proc., § 697.350). If any prior installment is not paid, all
9 funds received or collected by the County from PLUS TRANZ, INC., as payment
10 under the judgment will be applied first to interest. If PLUS TRANZ, INC., pays
11 any installment early, the due date for later installments is not advanced. At any
12 time, PLUS TRANZ, INC., may pay all remaining outstanding or unmatured
13 installments and interest, if any.

14 L. The Parties agree that notice pursuant to this stipulation, and the judgment entered
15 pursuant to this stipulation, shall be provided to the Parties as follows:

16 i. **COUNTY OF FRESNO**

17 Office of Fresno County Counsel
18 c/o Code Enforcement Attorney
19 2220 Tulare Street, 5th Floor
20 Fresno, California 93721
21 (559) 600-3479
22 kroberson@fresncountyca.gov *and*
23 CountyCounselMailbox@fresnocountyca.gov

24 ii. **DEFENDANTS**

25 Plus Tranz, Inc.
26 c/o Mike Ball
27 P.O. Box 8537
28 Fresno, California 93747
(559) 217-5819
Mike@plustranz.com

Fennemore LLP
c/o Christopher A. Brown, Esq.
8080 N. Palm Ave., Ste. 300
Fresno, CA 93711
(559) 432-4500
cbrown@fennemorelaw.com

Kulwinder Bains
801 10th Street, 5th Floor
Modesto, California 95354
(415) 889-0777
kenea@kbainslaw.com

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Except as provided for inspection notices under paragraph 3.D., above, any notices pursuant to this stipulation must be in writing and mailed to the respective party pursuant to this paragraph 3.L.

M. Except as expressly provided in this Stipulation, each party to this Stipulation agrees to bear its own attorney's fees and costs incurred in this matter.

4. The Parties agree that the Court shall retain jurisdiction over this matter for the purposes of enforcing the judgment entered pursuant to this Stipulation and issuing any further orders as necessary.

5. Each person signing this Stipulation expressly warrants and represents that it is legally authorized to act on behalf of the party for which they sign and has full authority to obligate and bind that party to the terms of the conditions of this Stipulation pursuant to Code of Civil Procedure section 664.6 and Corporations Code section 313.

6. The Parties agree that this Stipulation may be executed in counterparts, each of which shall be deemed an original instrument, and all when taken together, shall constitute the Stipulation for Entry of Judgment.

[Signatures on next page]

1 IT IS SO STIPULATED

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3 FOR PLAINTIFFS

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5 Dated: _____

COUNTY OF FRESNO AND
THE PEOPLE OF THE STATE OF CALIFORNIA

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By: ERNEST BUDDY MENDES, Chairman of the
Board of Supervisors of the County of Fresno

10

11 APPROVED AS TO FORM:

12

13 Dated: _____

Office of Fresno County Counsel

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By: KYLE R. ROBERSON, Senior Deputy
Attorneys for Plaintiffs,
COUNTY OF FRESNO and
PEOPLE OF THE STATE OF CALIFORNIA

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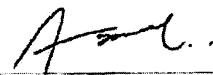
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20 FOR DEFENDANTS

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22 Dated: 7/25/25

By: 
ASKOK WADHWA, an individual

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24

25 Dated: 7-25-25

By: 
NEELAM WADHWA, an individual

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28 Dated: _____

By: _____
SWARAN BALL, an individual

1 IT IS SO STIPULATED

2

3 FOR PLAINTIFFS

4

5 Dated: _____

6

COUNTY OF FRESNO AND
THE PEOPLE OF THE STATE OF CALIFORNIA

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By: _____
ERNEST BUDDY MENDES, Chairman of the
Board of Supervisors of the County of Fresno

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11 APPROVED AS TO FORM:

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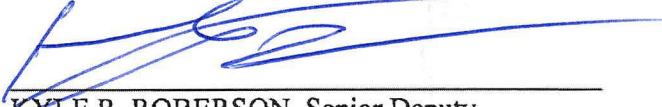
Dated: 7/29/2025

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Office of Fresno County Counsel

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By: 
KYLE R. ROBERSON, Senior Deputy
Attorneys for Plaintiffs,
COUNTY OF FRESNO and
PEOPLE OF THE STATE OF CALIFORNIA

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20 FOR DEFENDANTS

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22 Dated: _____

By _____
ASKOK WADHWA, an individual

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25 Dated: _____

By _____
NEELAM WADHWA, an individual

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Dated: 7/11/25

By SWARAN J. BALL
SWARAN BALL, an individual

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Dated: 7/11/25

By MANJIT K. BALL
MANJIT BALL, an individual

Dated: 7/11/25

By Ball
MIKE BALL, an individual and as Chief Executive
Officer of PLUS TRANZ, INC., a California
Corporation

Dated: 7/11/25

By Ball
Mike Ball, Chief Executive Officer, on behalf of
PLUS TRANZ, INC., a California Corporation

APPROVED AS TO FORM:

FENNEMORE-DOWLING AARON

Dated: _____

By _____
CHRISTOPHER A. BROWN
Attorneys for Defendants, ASHOK WADHWA, an
individual; NEELAM WADHWA, an individual;
SWARAN BALL, an individual; MANJIT BALL,
an individual; MIKE BALL, an individual; PLUS
TRANZ, INC., a California Corporation

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Dated: _____

By _____
MANJIT BALL, an individual

Dated: _____

By _____
MIKE BALL, an individual and as Chief Executive
Officer of PLUS TRANZ, INC., a California
Corporation


Dated: _____

By _____
Mike Ball, Chief Executive Officer, on behalf of
PLUS TRANZ, INC., a California Corporation

APPROVED AS TO FORM:

FENNEMORE-DOWLING AARON

Dated: 7/29/25

By 
CHRISTOPHER A. BROWN
Attorneys for Defendants, ASHOK WADHWA, an
individual; NEELAM WADHWA, an individual;
SWARAN BALL, an individual; MANJIT BALL,
an individual; MIKE BALL, an individual; PLUS
TRANZ, INC., a California Corporation

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JUDGEMENT IS ENTERED FOR PLAINTIFFS AND AGAINST DEFENDANTS ON THE FOLLOWING TERMS:

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1 inspections limited to occur between the hours of 8:00 am and 6:00 pm and only on Mondays
2 through Fridays, without a warrant or further orders from this Court to monitor compliance
3 with terms of this Judgment for a period of three hundred sixty-five (365) calendar days after
4 the date of service of the Notice of Entry of Judgment.

5 7. The County's authorization to enter the Subject Property to inspect may be modified
6 by further orders issued by the Court.

7 8. Upon the finding of any Illegal Conditions, the County will provide written notice to
8 Defendants pursuant to paragraph 13 with a demand to abate all noticed Illegal Conditions
9 within a period fifteen (15) days from the mailing of the notice described in this paragraph.
10 In the event Defendants fail to fully and timely abate the noticed Illegal Conditions, the
11 County is authorized to enter the Subject Property and abate the noticed Illegal Conditions
12 and recover the cost of the County's abatement work pursuant to paragraph 9.

13 9. The County may recover from Defendants, jointly and severally, all of the County's
14 costs incurred in abating any Illegal Condition, and these costs may be secured by a judgment
15 lien, and Defendants shall forfeit all legal right to possession and ownership interest in any
16 materials the County removes from the Property for the for the purposes of abating the Illegal
17 Condition.

18 10. Defendant PLUS TRANZ, INC., shall pay a monetary award to the County in the
19 amount of fifty thousand dollars (\$50,000) to compromise and resolve Defendants' liability
20 for unpaid administrative fines and civil penalties authorized pursuant to California Business
21 and Professions Code section 17206. PLUS TRANZ, INC., shall satisfy the fifty thousand
22 dollars (\$50,000) monetary award to the County as follows: (a) payment of ten (10) equal
23 installments of five thousand dollars (\$5,000); (b) the first installment of five thousand
24 dollars (\$5,000) is due to the County within five (5) court days after the date of service of the
25 Notice of Entry of Judgment; and (c) the nine (9) subsequent installments of five thousand
26 (\$5,000) are due each ninety (90) calendar days after the due date of the first installment until
27 the full amount of fifty thousand dollars (\$50,000) is paid to the County (as provided in Code
28 of Civ. Proc., § 116.620). Payment shall be made by check or money order payable to the

1 "County of Fresno," and delivered to the Office of the Fresno County Counsel, c/o Code
2 Enforcement Attorney, 2200 Tulare Street, 5th Floor, Fresno, California 93721.

3 11. Upon full payment of the fifty thousand dollars (\$50,000) monetary award, the County
4 shall file and serve an Acknowledgement of Satisfaction of Judgment, Judicial Council Form
5 EJ-100, as this form may be amended by the Judicial Council.

6 12. If any installment is not paid when due, interest accrues on the unpaid installment at
7 the legal rate for a money judgment (as provided in Code Civ. Proc., § 685.010) beginning on
8 the date the installment becomes due (as provided in Code Civ. Proc., § 685.020). This
9 judgment does not arise from a claim related to medical expenses or personal debt. In
10 addition, if any installment is not paid when due, the County may avail itself to the
11 procedures to enforce money judgments under the laws of the State of California, including,
12 but not limited to, a lien on the Subject Property and garnishment of the bank accounts held
13 by PLUS TRANZ, INC. If any installment is not paid when due, a judgment lien on the
14 Subject Property may be enforced for the amount of unmatured installments (as provided in
15 Code Civ. Proc., § 697.350). If any prior installment is not paid, all funds received or
16 collected by the County from PLUS TRANZ, INC., as payment under this judgment may be
17 applied first to interest. If PLUS TRANZ, INC., pays any installment early, the due date for
18 later installments is not advanced. At any time, PLUS TRANZ, INC., may pay all remaining
19 outstanding or unmatured installments and interest, if any.

20 13. The Parties shall issue any notices pursuant to this judgment as follows:

21 **COUNTY OF FRESNO**

22 Office of the Fresno County Counsel

23 c/o Code Enforcement Attorney

24 2220 Tulare Street, 5th Floor

25 Fresno, California 93721

26 (559) 600-3479

27 kroberson@fresnocountyca.gov and

28 CountyCounselMailbox@fresnocountyca.gov

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DEFENDANTS

Plus Tranz, Inc.
c/o Mike Ball
P.O. Box 8537
Fresno, California 93747
(559) 217-5819
Mike@plustranz.com

Fennemore LLP
c/o Christopher A. Brown, Esq.
8080 N. Palm Ave., Ste. 300
Fresno, CA 93711
(559) 432-4500
cbrown@fennemorelaw.com

Kulwinder Bains
801 10th Street, 5th Floor
Modesto, California 95354
(415) 889-0777
kenea@kbainslaw.com

Except as provided for inspection notices under paragraph 4, above, any notice issued pursuant to this judgment must be in writing and mailed to the respective party pursuant to this paragraph 13.

14. Each party shall bear its own attorney's fees and costs incurred in this matter.

15. The Court retains jurisdiction over this matter for the purposes of enforcing this judgment pursuant to Code of Civil Procedure section 664.6.

IT IS SO ORDERED.

Dated: _____

By: _____

JUDGE OF THE SUPERIOR COURT