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19 DALE K. LARSON (SBN 266165)
20 SALVADOR E. PÉREZ (SBN 309514)
21 TESSA BAIZER (SBN 336028)
22 STRUMWASSER & WOOCHEER LLP
23 1250 6th Street, Suite 205
24 Santa Monica, California 90401
25 Tel: 310-576-1233 • Fax: 310-319-0156
26 E-mail: dlarson@strumwooch.com
27 sperez@strumwooch.com
28 tbaizer@strumwooch.com

*Attorneys for Non-Parties Plaintiffs LA Forward Institute, Sylvia Aroth,
Kathleen L. Coates, and Gary Williams in unrelated Case No. 24STCV17156*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

PEOPLE ORGANIZED FOR WESTSIDE
RENEWAL,

Petitioner,

v.

THE LOS ANGELES BOARD OF
TRANSPORTATION COMMISSIONERS,

Respondent.

Case No. 25STCP01091

**NOTICE OF FILING OF OPPOSITION TO
UNRELATED PARTY CITY OF LOS
ANGELES'S NOTICE OF RELATED
CASE**

Assigned to the Hon. Stephen I. Goorvitch

Dept.: 82
Date Action Filed: March 19, 2025

1 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

2 Please take notice that LA Forward Institute, Sylvia Aroth, Kathleen Coates, and Gary Williams,
3 who are the Plaintiffs in the unrelated lawsuit *LA Forward Institute, et al v. City of Los Angeles, et al*,
4 Los Angeles Superior Court Case Number 24STCV17156 (“Unrelated Plaintiffs”), filed the attached
5 Opposition to Defendant City of Los Angeles’s Notice of Related Case (“Opposition”) in that case on
6 April 18, 2025. At the time of that filing, no notice of related case had yet been filed in this action. As
7 detailed in the attached Opposition, the Unrelated Plaintiffs assert that the cases listed in the City of Los
8 Angeles’s Notice of Related Case are not related and that the notice fails to meet the legal standard
9 under California Rules of Court, rule 3.300. The Notice also failed to comply with the rule’s procedural
10 requirements.

11
12 DATED: May 7, 2025

Respectfully Submitted,

13 PUBLIC COUNSEL

14 Faizah Malik

Mark Rosenbaum

15 WESTERN CENTER ON LAW & POVERTY

16 Nisha N. Vyas

Katherine J. Gomez McKeon

17 Robert Newman

18 STRUMWASSER & WOOCHER LLP

19 Dale K. Larson

Salvador E. Pérez

20 By 

21 Dale K. Larson

22 *Attorneys for Non-Parties Plaintiffs LA Forward*
23 *Institute, Sylvia Aroth, Kathleen L. Coates, and Gary*
24 *Williams in unrelated Case No. 24STCV17156*

ATTACHMENT

1 FAIZAH MALIK (SBN 320479)
2 MARK ROSENBAUM (SBN 59940)
3 GREG BONETT (SBN 307436)
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10 gbonett@publicconsel.org

11 KATHERINE J. GOMEZ McKEON (SBN 318222)
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20 SALVADOR E. PÉREZ (SBN 309514)
21 TESSA BAIZER (SBN 336028)
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23 1250 6th Street, Suite 205
24 Santa Monica, California 90401
25 Tel: 310-576-1233 • Fax: 310-319-0156
26 E-mail: dlarson@strumwooch.com
27 sperez@strumwooch.com
28 tbaizer@strumwooch.com

*Attorneys for Plaintiffs LA Forward Institute, Sylvia Aroth,
Kathleen L. Coates, and Gary Williams*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

LA FORWARD INSTITUTE, a non-profit
organization; SYLVIA AROTH, an individual;
KATHLEEN L. COATES, an individual; and
GARY WILLIAMS, an individual,

Plaintiffs,

v.

CITY OF LOS ANGELES; LOS ANGELES
CITY COUNCIL; LOS ANGELES HOUSING
DEPARTMENT; LOS ANGELES
DEPARTMENT OF TRANSPORTATION; and
DOES 1 through 100, inclusive,

Defendants.

Electronically FILED by
Superior Court of California,
County of Los Angeles
4/18/2025 5:21 PM
David W. Slayton,
Executive Officer/Clerk of Court,
By S. Bolden, Deputy Clerk

Case No. 24STCV17156

**PLAINTIFFS' OPPOSITION TO
DEFENDANT CITY OF LOS ANGELES'S
NOTICE OF RELATED CASE;
DECLARATION OF KATHERINE J.
GOMEZ McKEON IN SUPPORT
THEREOF**

Assigned to the Hon. Robert D. Broadbelt III

Dept.: 53
Date Action Filed: July 10, 2024

1 **INTRODUCTION**

2 Defendant City of Los Angeles (“the City”) filed and served on Plaintiffs a Notice of Related
3 Case on April 11, 2025, regarding two recently filed writ petitions pending in the Los Angeles Superior
4 Court Writs and Receivers Departments. (Declaration of Katherine J. Gomez McKeon in Opposition to
5 the Notice of Related Case (“McKeon Decl.”), ¶ 2, Exh. 1.) In fact, those two writ cases are not related
6 to this action pursuant to California Rules of Court, rule 3.300.

7 **ARGUMENT**

8 **I. The City’s Notice of Related Case Fails to Meet the Standard under Rule 3.300**

9 A pending civil case is related to another pending or past civil case if the cases: “(1) Involve the
10 same parties and are based on the same or similar claims; (2) Arise from the same or substantially
11 identical transactions, incidents, or events requiring the determination of the same or substantially
12 identical questions of law or fact; (3) Involve claims against, title to, possession of, or damages to the
13 same property; or (4) Are likely for other reasons to require substantial duplication of judicial resources
14 if heard by different judges.” (*Id.*, § (a).) In such cases, the Court in its discretion may, but is not
15 required to, order that the cases be related and may assign them to a single judge or department. (*Id.*,
16 § (h)(1).) The City has failed to meet the requisite criteria as to either of the two writ petitions.

17 **A. Venice Community Housing Corporation v. The Los Angeles Board of Transportation**
18 **Commissioners, Los Angeles Superior Court, Case No. 25STCP00892, Is Not**
19 **Related to this Action.**

20 The first case is a writ petition entitled *Venice Community Housing Corporation v. The Los*
21 *Angeles Board of Transportation Commissioners*, Los Angeles Superior Court, Case No.
22 25STCP00892, which was filed on March 7, 2025, and which has been assigned to the Honorable
23 Curtis Kin. The City acknowledges in its Notice of Related Case that *Venice Community Housing*
24 *Corporation* does not involve the same parties as this action¹ nor is it based on the same or similar
25 claims. While that writ petition was brought by developers of the project, the present case was brought
26 by three individuals and LA Forward Institute, a 501(c)(3) organization.

27 Despite the City’s assertion, the two cases also do not arise from the same or substantially
28 identical transactions, incidents, or events requiring the determination of the same or substantially

¹ Of the four parties to that writ petition and the eight parties to the instant case, only the City of Los Angeles is a party to both cases.

1 identical questions of law or fact. *Venice Community Housing Corporation* only concerns the actions of
2 the Los Angeles Board of Transportation Commissioners at a Special Meeting on December 10, 2024,
3 and only raises claims for writ of mandate and declaratory relief that the Board of Transportation
4 Commissioners' actions at that December 10, 2024, Special Meeting were *ultra vires* pursuant to the
5 relevant provisions of the Los Angeles Administrative Code. This action, on the other hand, seeks
6 injunctive and declaratory relief and concerns the City's many ongoing delays and obstruction of the
7 Venice Dell affordable housing project, beginning in February 2023 and continuing to the present. This
8 case contains no writ petition and alleges violations of the California Fair Employment and Housing
9 Act; the California Constitution's equal protection clause; Government Code section 65008,
10 subdivisions (b) and (d); Government Code section 8899.50; the Los Angeles City Charter; article XI,
11 section 7 of the California Constitution; and section 2.1 of the Los Angeles Administrative Code
12 section 2.1. None of these claims are present in the *Venice Community Housing Corporation* writ
13 petition.

14 Additionally, the two lawsuits do not involve claims against, title to, possession or damages to
15 the same property. While both lawsuits concern the development of the Venice Dell Project, as
16 discussed above, neither lawsuit alleges any claims against, title to, possession or damages to the
17 property at that location.

18 The two lawsuits are also unlikely to require substantial duplication of judicial resources if
19 heard by different judges. *Venice Community Housing Corporation* involves events that occurred on
20 just one day and raises a single legal issue best decided by a writ judge. This case, on the other hand, is
21 a non-writ, civil dispute involving a pattern of conduct by the City, the City Council, the City's
22 Housing Department, and the City's Department of Transportation. Indeed, the City offers no
23 explanation in the Notice of Related Case to support its claim that the two cases will allegedly require
24 much, if any, duplication of judicial resources if heard by different judges.

25 **B. *People Organized for Westside Renewal v. The Los Angeles Board of Transportation***
26 ***Commissioners, Los Angeles Superior Court, Case No. 25STCP01091, Is Not***
27 ***Related to this Action.***

28 The second case is a writ petition entitled *People Organized for Westside Renewal v. The Los*
Angeles Board of Transportation Commissioners, Los Angeles Superior Court, Case No.

1 25STCP01091, which was filed on March 19, 2025, and which has been assigned to the Honorable
2 Stephen Goorvitch. The City acknowledges in its Notice of Related Case that *People Organized for*
3 *Westside Renewal* does not involve any of the same parties in this action, nor is it based on the same or
4 similar claims.

5 The two lawsuits do not arise from the same or substantially identical transactions, incidents, or
6 events requiring the determination of the same or substantially identical questions of law or fact. *People*
7 *Organized for Westside Renewal* is a writ petition alleging only a violation of the Brown Act for
8 actions taken by the Board of Transportation Commissioners at that Special Meeting on December 10,
9 2024. As noted above, the scope of this action is much broader, involves different legal issues, and
10 none of the ten parties to the two lawsuits are common to both.

11 Once again, the two lawsuits do not involve claims against, title to, possession or damages to
12 the same property because neither lawsuit alleges any claims against, title to, possession or damages to
13 the property at that location. For the same reasons as stated above regarding the *Venice Community*
14 *Housing Corporation* writ petition, the two lawsuits are unlikely to require substantial duplication of
15 judicial resources if heard by different judges. *People Organized for Westside Renewal* also involves
16 events that occurred on just one day and raises a single Brown Act claim best decided by a writ judge.

17 Finally, Plaintiffs note that there have been at least two other cases that relate to the Venice Dell
18 affordable housing project. Those are *Coalition for Safe Coastal Development v. City of Los Angeles*,
19 Los Angeles Superior Court, Case No. 22STCP00162; and *Coalition for Safe Coastal Development v.*
20 *City of Los Angeles*, Los Angeles Superior Court, Case No. 22STCP03359. Neither of those prior cases
21 was deemed related to each other or to the present case. (McKeon Decl., ¶ 5.)

22 **II. The City's Notice of Related Case Fails to Comply with Sections (d) and (e) of Rule 3.300**

23 The Notice is also procedurally defective because it was not filed in all pending cases listed in
24 the Notice, nor was it served on all parties in those cases, as required by section (d) of Rule 3.300.
25 (McKeon Decl., ¶¶ 3-4, Exh. 2.) In fact, counsel for the plaintiffs in the two writ cases have yet to be
26 served the Notice of Related Case, despite the fact that defendants were personally served in both writ
27 cases on March 28, 2025, and that the City Attorney apparently serves as counsel in both writ cases and
28 this case. (*Id.*, ¶ 4.) This failure to serve plaintiffs' counsel in the writ petitions makes the Notice of

1 Related Case untimely pursuant to the requirement in section (e) that the Notice of Related Case “must
2 be served and filed as soon as possible, but no later than 15 days after the facts concerning the existence
3 of related cases become known.”

4 **CONCLUSION**

5 For these reasons, Plaintiffs respectfully request that the Court not relate either writ petition to
6 the present civil case.

7
8 DATED: April 18, 2025

Respectfully Submitted,

9 PUBLIC COUNSEL

10 Faizah Malik

11 Mark Rosenbaum

Greg Bonett

12 WESTERN CENTER ON LAW & POVERTY

13 Katherine J. Gomez McKeon

14 Robert Newman

STRUMWASSER & WOOCHEER LLP

15 Dale K. Larson

16 Salvador E. Pérez

17 By  _____

18 Dale K. Larson

19 *Attorneys for All Plaintiffs*

Exhibit 1

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (<i>Name, State Bar number, and address</i>): Ilse C. Scott (SBN 233433) NOSSAMAN LLP 50 California Street, 34th Floor San Francisco, CA 94111 TELEPHONE NO.: 415.398.3600 FAX NO. (<i>Optional</i>): 415.398.2438 E-MAIL ADDRESS (<i>Optional</i>): iscott@nossaman.com ATTORNEY FOR (<i>Name</i>): Defendant City of Los Angeles</p>	<p style="text-align: center;">FOR COURT USE ONLY</p>
<p>SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME:</p>	
<p>PLAINTIFF/PETITIONER: LA Forward Institute, et al. DEFENDANT/RESPONDENT: City of Los Angeles</p>	<p>CASE NUMBER: 24STCV17156 JUDICIAL OFFICER: Hon. Robert D. Broadbelt III</p>
<p>NOTICE OF RELATED CASE</p>	<p>DEPT.: 53</p>

Identify, in chronological order according to date of filing, all cases related to the case referenced above.

1.
 - a. Title: Venice Community Housing Corporation v. The Los Angeles Board of Transportation Commissioners
 - b. Case number: 25STCP00892
 - c. Court: same as above
 other state or federal court (*name and address*):
 - d. Department: 86
 - e. Case type: limited civil unlimited civil probate family law other (*specify*): Writ
 - f. Filing date: March 7, 2025
 - g. Has this case been designated or determined as "complex?" Yes No
 - h. Relationship of this case to the case referenced above (*check all that apply*):
 - involves the same parties and is based on the same or similar claims.
 - arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
 - involves claims against, title to, possession of, or damages to the same property.
 - is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
 - Additional explanation is attached in attachment 1h
 - i. Status of case:
 - pending
 - dismissed with without prejudice
 - disposed of by judgment

2.
 - a. Title: People Organized for Westside Renewal v. The Los Angeles Board of Transportation Commissioners
 - b. Case number: 25STCP01091
 - c. Court: same as above
 other state or federal court (*name and address*):
 - d. Department: 82

PLAINTIFF/PETITIONER: LA Forward Institute, et al.	CASE NUMBER: 24STCV17156
DEFENDANT/RESPONDENT: City of Los Angeles	

2. (continued)

e. Case type: limited civil unlimited civil probate family law other (specify): Writ

f. Filing date: March 19, 2025

g. Has this case been designated or determined as "complex?" Yes No

h. Relationship of this case to the case referenced above (check all that apply):

- involves the same parties and is based on the same or similar claims.
- arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
- involves claims against, title to, possession of, or damages to the same property.
- is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
- Additional explanation is attached in attachment 2h

i. Status of case:

- pending
- dismissed with without prejudice
- disposed of by judgment

3. a. Title:

b. Case number:

c. Court: same as above
 other state or federal court (name and address):

d. Department:

e. Case type: limited civil unlimited civil probate family law other (specify):

f. Filing date:

g. Has this case been designated or determined as "complex?" Yes No

h. Relationship of this case to the case referenced above (check all that apply):

- involves the same parties and is based on the same or similar claims.
- arises from the same or substantially identical transactions, incidents, or events requiring the determination of the same or substantially identical questions of law or fact.
- involves claims against, title to, possession of, or damages to the same property.
- is likely for other reasons to require substantial duplication of judicial resources if heard by different judges.
- Additional explanation is attached in attachment 3h

i. Status of case:

- pending
- dismissed with without prejudice
- disposed of by judgment

4. Additional related cases are described in Attachment 4. Number of pages attached: _____

Date: April 11, 2025

Ilse C. Scott
(TYPE OR PRINT NAME OF PARTY OR ATTORNEY)

 /s/ Ilse C. Scott
(SIGNATURE OF PARTY OR ATTORNEY)

PLAINTIFF/PETITIONER: LA Forward Institute, et al.	CASE NUMBER: 24STCV17156
DEFENDANT/RESPONDENT: City of Los Angeles	

**PROOF OF SERVICE BY FIRST-CLASS MAIL
NOTICE OF RELATED CASE**

(NOTE: You cannot serve the Notice of Related Case if you are a party in the action. The person who served the notice must complete this proof of service. The notice must be served on all known parties in each related action or proceeding.)

1. I am at least 18 years old and **not a party to this action**. I am a resident of or employed in the county where the mailing took place, and my residence or business address is (*specify*): c/o Nossaman LLP, 50 California Street, 34th Floor, San Francisco, CA 94111

2. I served a copy of the *Notice of Related Case* by enclosing it in a sealed envelope with first-class postage fully prepaid and (*check one*):
 - a. deposited the sealed envelope with the United States Postal Service.
 - b. placed the sealed envelope for collection and processing for mailing, following this business's usual practices, with which I am readily familiar. On the same day correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service.

3. The *Notice of Related Case* was mailed:
 - a. on (*date*): April 11, 2025
 - b. from (*city and state*): San Francisco, CA

4. The envelope was addressed and mailed as follows:

a. Name of person served: Faizah Malik, Mark Rosenbaum
 Street address: 610 South Ardmore Avenue
 City: Los Angeles
 State and zip code: CA 90005

c. Name of person served: Dale K. Larson, Salvador E. Pérez, Tessa Baizer
 Street address: 1250 6th Street, Suite 205
 City: Santa Monica
 State and zip code: CA 90401

b. Name of person served: Katherine J. Gomez McKeon, Robert D. Newman
 Street address: 3701 Wilshire Boulevard, #208
 City: Los Angeles
 State and zip code: CA 90010

d. Name of person served:
 Street address:
 City:
 State and zip code:


Names and addresses of additional persons served are attached. (*You may use form POS-030(P).*)

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

Date: April 11, 2025

Anthony Levintow

 (TYPE OR PRINT NAME OF DECLARANT)

 /s/ Anthony Levintow

 (SIGNATURE OF DECLARANT)

Exhibit 2

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Anna Hales (SBN 341674) LEGAL AID FOUNDATION OF LOS ANGELES 7000 South Broadway Avenue, Los Angeles, CA 90003 TELEPHONE NO.: (213) 640-3841 FAX NO.: (323) 301-4676 E-MAIL ADDRESS: ahaless@lafila.org ATTORNEY FOR (Name): Plaintiffs	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse	
PLAINTIFF/PETITIONER: VENICE COMMUNITY HOUSING CORPORATION; et al. DEFENDANT/RESPONDENT: THE LOS ANGELES BOARD OF TRANSPORTATION COMMISSIONERS; et al.	CASE NUMBER: 25STCP00892
PROOF OF SERVICE OF SUMMONS	Ref. No. or File No.: 2430392CE

(Separate proof of service is required for each party served.)

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - a. Summons
 - b. Complaint
 - c. Alternative Dispute Resolution (ADR) package
 - d. Civil Case Cover Sheet
 - e. Cross-Complaint
 - f. other (specify documents): **VERIFIED PETITION FOR WRIT OF MANDATE; CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION; NOTICE OF CASE ASSIGNMENT - UNLIMITED CIVIL CASE; NOTICE OF TRIAL SETTING CONFERENCE**
3. a. Party served (specify name of party as shown on documents served):
THE CITY OF LOS ANGELES
 - b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):
Madisol Garcia, Deputy Clerk, Authorized person to accept service of process
4. Address where the party was served: **200 North Spring Street
Los Angeles, CA 90012**
5. I served the party (check proper box)
 - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **3/28/2025** (2) at (time): **11:28 AM**
 - b. **by substituted service.** On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3):
 - (1) **(business)** a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
 - (2) **(home)** a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (3) **(physical address unknown)** a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
 - (4) I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or a declaration of mailing is attached.
 - (5) I attach a **declaration of diligence** stating actions taken first to attempt personal service.

Plaintiff: **VENICE COMMUNITY HOUSING CORPORATION; et al.**

CASE NUMBER:

25STCP00892

Defendant: **THE LOS ANGELES BOARD OF TRANSPORTATION COMMISSIONERS; et al.**

- c. **by mail and acknowledgment of receipt of service.** I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): _____ (2) from (city): _____
- (3) with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgement of Receipt.) (Code Civ. Proc., § 415.30.)
- (4) to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. **by other means** (specify means of service and authorizing code section):

Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. as an individual defendant.
- b. as the person sued under the fictitious name of (specify): _____
- c. as occupant.
- d. On behalf of (specify): **THE CITY OF LOS ANGELES**
under the following Code of Civil Procedure section:

- | | |
|---|---|
| <input type="checkbox"/> 416.10 (corporation) | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation) | <input type="checkbox"/> 416.60 (minor) |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee) |
| <input type="checkbox"/> 416.40 (association or partnership) | <input type="checkbox"/> 416.90 (authorized person) |
| <input checked="" type="checkbox"/> 416.50 (public entity) | <input type="checkbox"/> 415.46 (occupant) |
| | <input type="checkbox"/> other: _____ |

7. **Person who served papers**

- a. Name: **Mitch Morgan - Ace Attorney Service, Inc.**
- b. Address: **800 S. Figueroa Street, Suite 900 Los Angeles, CA 90017**
- c. Telephone number: **(213) 623-3979**
- d. **The fee** for service was: **\$ 232.47**
- e. I am:

- (1) not a registered California process server.
- (2) exempt from registration under Business and Professions Code section 22350(b).
- (3) registered California process server:
- (i) owner employee independent contractor.
- (ii) Registration No.: **2023096633**
- (iii) County: **LOS ANGELES**

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

or

9. **I am a California sheriff or marshal and** I certify that the foregoing is true and correct.

Date: **4/2/2025**

Mitch Morgan

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

(Signature - Per CC §1633.7)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Anna Hales (SBN 341674) LEGAL AID FOUNDATION OF LOS ANGELES 7000 South Broadway Avenue, Los Angeles, CA 90003 TELEPHONE NO.: (213) 640-3841 FAX NO.: (323) 301-4676 E-MAIL ADDRESS: ahales@lafila.org ATTORNEY FOR (Name): Plaintiffs	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse	
PLAINTIFF/PETITIONER: VENICE COMMUNITY HOUSING CORPORATION; et al. DEFENDANT/RESPONDENT: THE LOS ANGELES BOARD OF TRANSPORTATION COMMISSIONERS; et al.	CASE NUMBER: 25STCP00892
PROOF OF SERVICE OF SUMMONS	Ref. No. or File No.: 2430395CE

(Separate proof of service is required for each party served.)

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - a. Summons
 - b. Complaint
 - c. Alternative Dispute Resolution (ADR) package
 - d. Civil Case Cover Sheet
 - e. Cross-Complaint
 - f. other (specify documents): **VERIFIED PETITION FOR WRIT OF MANDATE; CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION; NOTICE OF CASE ASSIGNMENT - UNLIMITED CIVIL CASE; NOTICE OF TRIAL SETTING CONFERENCE**
3. a. Party served (specify name of party as shown on documents served):
THE LOS ANGELES BOARD OF TRANSPORTATION COMMISSIONERS
 - b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):
Madisol Garcia, Deputy Clerk, Authorized person to accept service of process
4. Address where the party was served: **200 North Spring Street
Los Angeles, CA 90012**
5. I served the party (check proper box)
 - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **3/28/2025** (2) at (time): **11:28 AM**
 - b. **by substituted service.** On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3):
 - (1) **(business)** a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
 - (2) **(home)** a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (3) **(physical address unknown)** a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
 - (4) I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or a declaration of mailing is attached.
 - (5) I attach a **declaration of diligence** stating actions taken first to attempt personal service.

Plaintiff: VENICE COMMUNITY HOUSING CORPORATION; et al. Defendant: THE LOS ANGELES BOARD OF TRANSPORTATION COMMISSIONERS; et al.	CASE NUMBER: 25STCP00892
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- c. **by mail and acknowledgment of receipt of service.** I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): _____ (2) from (city): _____
- (3) with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgement of Receipt.) (Code Civ. Proc., § 415.30.)
- (4) to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. **by other means** (specify means of service and authorizing code section):

Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. as an individual defendant.
- b. as the person sued under the fictitious name of (specify): _____
- c. as occupant.
- d. On behalf of (specify): **THE LOS ANGELES BOARD OF TRANSPORTATION COMMISSIONERS**
under the following Code of Civil Procedure section:
- | | |
|---|---|
| <input type="checkbox"/> 416.10 (corporation) | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation) | <input type="checkbox"/> 416.60 (minor) |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee) |
| <input type="checkbox"/> 416.40 (association or partnership) | <input type="checkbox"/> 416.90 (authorized person) |
| <input checked="" type="checkbox"/> 416.50 (public entity) | <input type="checkbox"/> 415.46 (occupant) |
| | <input type="checkbox"/> other: |

7. **Person who served papers**

- a. Name: **Mitch Morgan - Ace Attorney Service, Inc.**
- b. Address: **800 S. Figueroa Street, Suite 900 Los Angeles, CA 90017**
- c. Telephone number: **(213) 623-3979**
- d. **The fee** for service was: **\$ 139.75**
- e. I am:

- (1) not a registered California process server.
- (2) exempt from registration under Business and Professions Code section 22350(b).
- (3) registered California process server:
- (i) owner employee independent contractor.
- (ii) Registration No.: **2023096633**
- (iii) County: **LOS ANGELES**

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


or

9. **I am a California sheriff or marshal and** I certify that the foregoing is true and correct.

Date: **4/2/2025**

Mitch Morgan

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)



(Signature - Per CC §1633.7)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Anna Hales (SBN 341674) LEGAL AID FOUNDATION OF LOS ANGELES 7000 South Broadway Avenue, Los Angeles, CA 90003 TELEPHONE NO.: (213) 640-3841 FAX NO.: (323) 301-4676 E-MAIL ADDRESS: ahales@lafila.org ATTORNEY FOR (Name): Petitioner	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 111 North Hill Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse	
PLAINTIFF/PETITIONER: PEOPLE ORGANIZED FOR WESTSIDE RENEWAL DEFENDANT/RESPONDENT: THE LOS ANGELES BOARD OF TRANSPORTATION COMMISSIONERS	CASE NUMBER: 25STCP01091
PROOF OF SERVICE OF SUMMONS	Ref. No. or File No.: 2430397CE

(Separate proof of service is required for each party served.)

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - a. Summons
 - b. Complaint
 - c. Alternative Dispute Resolution (ADR) package
 - d. Civil Case Cover Sheet
 - e. Cross-Complaint
 - f. other (specify documents): **VERIFIED PETITION FOR DECLARATORY RELIEF AND WRIT OF MANDATE FOR VIOLATIONS OF THE RALPH M. BROWN ACT; CIVIL CASE COVER SHEET ADDENDUM AND STATEMENT OF LOCATION; NOTICE OF CASE ASSIGNMENT - UNLIMITED CIVIL CASE**
3. a. Party served (specify name of party as shown on documents served):
THE LOS ANGELES BOARD OF TRANSPORTATION COMMISSIONERS
 - b. Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):
Madisol Garcia, Deputy Clerk, Authorized person to accept service of process
4. Address where the party was served: **200 North Spring Street
Los Angeles, CA 90012**
5. I served the party (check proper box)
 - a. **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **3/28/2025** (2) at (time): **11:28 AM**
 - b. **by substituted service.** On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3):
 - (1) **(business)** a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
 - (2) **(home)** a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (3) **(physical address unknown)** a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
 - (4) I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or a declaration of mailing is attached.
 - (5) I attach a **declaration of diligence** stating actions taken first to attempt personal service.

Plaintiff: PEOPLE ORGANIZED FOR WESTSIDE RENEWAL Defendant: THE LOS ANGELES BOARD OF TRANSPORTATION COMMISSIONERS	CASE NUMBER: 25STCP01091
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- c. **by mail and acknowledgment of receipt of service.** I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): _____ (2) from (city): _____
- (3) with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgement of Receipt.) (Code Civ. Proc., § 415.30.)
- (4) to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. **by other means** (specify means of service and authorizing code section):

Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. as an individual defendant.
- b. as the person sued under the fictitious name of (specify): _____
- c. as occupant.
- d. On behalf of (specify): **THE LOS ANGELES BOARD OF TRANSPORTATION COMMISSIONERS**
under the following Code of Civil Procedure section:
- | | |
|---|---|
| <input type="checkbox"/> 416.10 (corporation) | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation) | <input type="checkbox"/> 416.60 (minor) |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee) |
| <input type="checkbox"/> 416.40 (association or partnership) | <input type="checkbox"/> 416.90 (authorized person) |
| <input checked="" type="checkbox"/> 416.50 (public entity) | <input type="checkbox"/> 415.46 (occupant) |
| | <input type="checkbox"/> other: |

7. **Person who served papers**

- a. Name: **Mitch Morgan - Ace Attorney Service, Inc.**
- b. Address: **800 S. Figueroa Street, Suite 900 Los Angeles, CA 90017**
- c. Telephone number: **(213) 623-3979**
- d. **The fee** for service was: **\$ 72.25**
- e. I am:

- (1) not a registered California process server.
- (2) exempt from registration under Business and Professions Code section 22350(b).
- (3) registered California process server:
- (i) owner employee independent contractor.
- (ii) Registration No.: **2023096633**
- (iii) County: **LOS ANGELES**

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


or

9. **I am a California sheriff or marshal and** I certify that the foregoing is true and correct.

Date: **4/2/2025**

Mitch Morgan

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)



(Signature - Per CC §1633.7)

PROOF OF SERVICE

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Re: *LA Forward, et al. v. City of Los Angeles, et al.*
L.A.S.C. Case No. 24STCV17156

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 1250 Sixth Street, Suite 205, Santa Monica, California 90401. My electronic mail address is jthomson@strumwooch.com.

On **April 18, 2025**, I served the foregoing document(s) described as **PLAINTIFFS' OPPOSITION TO NOTICE OF RELATED CASE** on all appropriate parties in this action, as listed below, by the method stated:

<p><u>Via EFS</u> Mei-Mei Cheng John W. Heath Valeria L. Flores Hydee Feldstein Los Angeles Housing Department Housing Division 200 N Spring St, 21st Floor Los Angeles, California 90012 Tel: 213-313-8294 Email: meimei.cheng@lacity.org john.heath@lacity.org valerie.flores@lacity.org hydee.feldsteinsoto@lacity.org</p> <p><i>Attorneys for Defendants City of Los Angeles; Los Angeles City Council; Los Angeles Housing Department; and Los Angeles Department of Transportation</i></p>	<p><u>Via EFS</u> Patrick J. Richard Ilse C. Scott NOSSAMAN LLP 50 California Street, 34th Floor San Francisco, California 94111 Tel: 415.398.3600 • Fax: 415.398.2438 Email: prichard@nossaman.com iscott@nossaman.com</p> <p>Paolo A. Hermoso NOSSAMAN LLP 777 South Figueroa Street, 34th Floor Los Angeles, California 90017 Tel: 213-612-7800 • Fax: 213-612-7801 Email: pheramoso@nossaman.com</p> <p><i>Attorneys for Defendants City of Los Angeles; Los Angeles City Council; Los Angeles Housing Department; and Los Angeles Department of Transportation</i></p>
<p><u>Via EFS</u> Anna Hales Kevin F. Mitchell Legal Aid Foundation of Los Angeles 7000 S. Broadway Los Angeles, California 90003 1149 3rd Street, Suite 300 Santa Monica, California 90403 Tel: (213) 640-3890 (323) 801-7968 Email: ahales@lafla.org kfmitchell@lafla.org</p> <p><i>Attorneys for Petitioner People Organized for Westside Renewal</i></p>	

1 If Electronic Filing Service (EFS) is indicated, I electronically filed the document(s)
2 with the Clerk of the Court by causing the documents to be sent to One Legal, the Court's Electronic
3 Filing Services Provider for electronic filing and service. Electronic service will be effected by One
4 Legal's case-filing system at the electronic mail addresses indicated on the attached Service List.

5 I declare under penalty of perjury under the laws of the State of California that the above is true
6 and correct and that this is executed on **April 18, 2025**, at Los Angeles, California.

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Jeff Thomson

PROOF OF SERVICE

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

Re: *People Organized for Westside Renewal. v. The Los Angeles Board of Transportation Commissioners et al.*, L.A.S.C. Case No. 25STCP01091

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is 1250 Sixth Street, Suite 205, Santa Monica, California 90401. My electronic mail address is loliver@strumwooch.com.

On **May 7, 2025**, I served the foregoing document(s) described as **NOTICE OF FILING OF OPPOSITION TO DEFENDANT CITY OF LOS ANGELES’S NOTICE OF RELATED CASE** on all appropriate parties in this action, as listed below, by the method stated:

If Electronic Filing Service (EFS) is indicated, I electronically filed the document(s) with the Clerk of the Court by causing the documents to be sent to One Legal, the Court’s Electronic Filing Services Provider for electronic filing and service. Electronic service will be effected by One Legal’s case-filing system at the electronic mail addresses indicated on the attached Service List.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct and that this is executed on **May 7, 2025**, at Los Angeles, California.


LaKeitha Oliver Dorham

Service List

Unrelated cases 24STCV17156, 25STCP00892 and 25STCP01091

<p><u>Via EFS</u></p> <p><u>Via EFS</u> Hydee Feldstein Valerie L. Flores John W. Heath Mei-Mei Cheng Office of the Los Angeles City Attorney 200 N. Main Street, 8th Floor Los Angeles, California 90012 Tel: 213-978-8209 • Fax: 213-978-7957 Email: meimei.cheng@lacity.org john.heath@lacity.org valerie.flores@lacity.org hydee.feldsteinsoto@lacity.org</p> <p>Patrick J. Richard Ilse C. Scott Nossaman LLP 50 California Street, 34th Floor San Francisco, California 94111 Tel: 415.398.3600 • Fax: 415.398.2438 Email: prichard@nossaman.com iscott@nossaman.com</p> <p>Paolo A. Hermoso Nossaman LLP 777 South Figueroa Street, 34th Floor Los Angeles, California 90017 Tel: 213.612.7800 • Fax: 213.612.7801 Email: phermoso@nossaman.com</p> <p><i>Attorneys for Defendants City of Los Angeles; Los Angeles City Council; Los Angeles Housing Department; and Los Angeles Department of Transportation</i></p>	<p><u>Via EFS (Unrelated cases 25STCP00892 and 25STCP1091)</u></p> <p>Anna Hales LEGAL AID FOUNDATION OF L.A. 7000 South Broadway Los Angeles, California 90003 Tel: 213-640-3890 • Fax: 323-301-4676</p> <p>Kevin F. Mitchell LEGAL AID FOUNDATION OF L.A. 1149 3rd Street, Suite 300 Santa Monica, California 90403 Tel: 323-801-7698 • Fax: 310-458-2140</p> <p><i>Attorney for Petitioners Venice Community Housing Corporation; Hollywood Community Housing; and People Organized for Westside Renewal</i></p> <p>George D. Lee Office of the Los Angeles City Attorney 200 N. Main Street, 8th Floor Los Angeles, California 90012 Tel: 213-978-8209 • Fax: 213-978-7957 Email: george.lee@lacity.org</p> <p><i>Attorney for Defendants/Respondents City of Los Angeles</i></p>
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