1 2 3 4 5 6 7 8 9 10 11 12 13	Charlotte Wen (SBN 313572) Email: cwen@irell.com Nicole Miller (SBN 334914) Email: nmiller@irell.com Connor He-Schaefer (SBN 341545) Email: che-schaefer@irell.com Michael Gniwisch (SBN 348762)	PUBLIC COUNSEL Gregory Bonett (SBN 307436) Email: gbonett@publiccounsel.org Faizah Malik (SBN 320479) Email: fmalik@publiccounsel.org Kathryn Eidmann (SBN 268053) Email: keidmann@publicounsel.org 610 S. Ardmore Avenue Los Angeles, California 90005 T: (213) 385-2977 F: (213) 385-9089		
14	SUPERIOR COURT OF THE STATE OF CALIFORNIA			
15	FOR THE COUNTY OF LOS ANGELES			
 16 17 18 19 20 21 22 23 24 25 26 27 28 	HOWARD JARVIS TAXPAYERS ASSOCIATION, APARTMENT ASSOCIATION OF GREATER LOS ANGELES, INC., NEWCASTLE COURTYARDS, LLC, a California limited liability company; JONATHAN BENABOU, as Trustee on behalf of THE MANI BENABOU FAMILY TRUST; and ROES 1 through 500 Plaintiffs, vs. CITY OF LOS ANGELES, COUNTY OF LO ANGELES, COUNTY OF LOS ANGELES RECORDER'S OFFICE, DOES 1 through 500 and ALL PERSONS INTERESTED IN THE MATTER OF MEASURE ULA, Defendants.)		

TO ALL PARTIES AND ATTORNEYS OF RECORD:

-	
2	PLEASE TAKE NOTICE that on September 26, 2023, at 8:30 a.m., or as soon
3	thereafter as the matter can be heard, in Department 72 of the Superior Court of the State
4	of California for the County of Los Angeles (located at 111 N. Hill St., Los Angeles, CA
5	90012), Defendants All Persons Interested in the Matter of the ULA, specifically, Korean
6	Immigrant Workers Advocates of Southern California DBA Koreatown Immigrant
7	Workers Alliance ("KIWA"), Southern California Association of Non-Profit Housing, Inc.
8	("SCANPH"), and Service Employees International Union Local 2015 ("SEIU")
9	(collectively, "Defendants") will move the court for Judgment on the Pleadings as to
10	Plaintiffs' Complaints, pursuant to California Code of Civil Procedure, section 438.
11	Defendants file this Motion for Judgment on the Pleadings as to all causes of action
12	stated in Plaintiffs Howard Jarvis Tax Association and Apartment Association of Greater
13	Los Angeles, Inc.'s (collectively, "HJTA") and Newcastle Courtyards, LLC and Jonathan
14	Benabou, as Trustee on behalf of the Mani Benabou Family Trust's (collectively,
15	"Newcastle") Complaints.
16	This Motion is made on the grounds that the Complaints do not state facts sufficient
17	to allege their respective causes of action.
18	The Motion will be based on this Notice of Motion and Motion, the accompanying
19	Memorandum of Points and Authorities, the pleadings and records on file in this action,
20	and such oral and documentary evidence as may be presented at the hearing.
21	
22	
23	
24	
25	
26	
27	
28	- 1 -

1	IRELL & MANELLA, LLP	
2	Chowlette I. Wen	
3	3 Nicole Miller	
4	4 Connor He-Schaefer Michael Gniwisch	
5	5 Skyler Terrebonne	
6	6	
7	7 PUBLIC COUNSEL	
8	8 Gregory Bonett Faizah Malik	
9		
10	10	
11	11 By:	
12	12 Skyler Terrebonne Attorney for Defend	ants Southern
13	12Skyler Terrebonne Attorney for Defend California Associati Housing, Inc., Korea Workers Advocates California DBA Kor Workers Alliance, a Employees Internati 2015	on of Non-Profit an Immigrant
14	14 Workers Advocates California DBA Kor	of Southern eatown Immigrant
15	15 Workers Alliance, a Employees Internati	nd Service onal Union Local
16		
17	17	
18	18	
19	19	
20	20	
21	21	
22	22	
23	23	
24	24	
25	25	
26		
27		
28		
	- 2 -	

1 2 3 4 5 6 7 8 9 10 11 12 13	PROOF OF SERVICE I, Skyler Terrebonne, 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 1800 Avenue of the Stars, Suite 900, Los Angeles, California 90067-4276. On June 23, 2023, I served an original version of the foregoing document described as NOTICE OF MOTION and MOTION FOR JUDGMENT ON THE PLEADINGS on each interested party, as stated in the attached service list, by electronic service, via upload to OneLegal. On June 26, 2023, I served a corrected version of the foregoing document, adding CRS information, on each interested party, as stated in the attached service list, by email. Executed on June 26, 2023, at Los Angeles, California. I declare under penalty of perjury under the laws of the State of California that the
14 15 16	foregoing is true and correct.
17 18	Skyler Terrebonne Skyler Terrebonne (Type or print name) (Signature)
19 20 21	
22 23	
24 25	
26 27 28	
	- 3 -

1	SERVICE LIST				
2	Via Electronic Service	Via Electronic Service			
3	Jonathan M. Coupal, Esq.	Hydee Feldstein Soto			
4	Timothy A. Bittle, Esq. Laura E. Dougherty, Esq.	Scott Marcus			
5	Laura E. Dougherty, Esq. Howard Jarvis Taxpayers Foundation 1201 K. Street, Suite 1030	Valerie L. Flores, Daniel Whitley			
6	Sacramento, CA 95814 Email: <u>laura@hjta.org</u>	Email: Daniel.Whitley@lacity.org OFFICE OF THE CITY ATTORNEY			
7		200 North Main Street, 920 City Hall			
8	Attorneys for Plaintiffs Howard Jarvis Taxpayers Association	East Los Angeles, CA 90012			
9	and Apartment Association of Greater Los Angeles	Tel: 213.978.7786 Fax: 213.978.7711			
10		Kevin D. Siegel			
11		E-mail: ksiegel@bwslaw.com J. Leah Castella			
12		E-mail: lcastella@bwslaw.com			
13		Tamar M. Burke E-mail: tburke@bwslaw.com			
14		Eileen Ollivier			
15		E-mail: eollivier@bwslaw.com BURKE, WILLIAMS & SORENSEN,			
16		LLP 1 California Streat, Suita 2050			
17		1 California Street, Suite 3050 San Francisco, CA 94111-5432			
18		Tel: 415.655.8100 Fax: 415.655.8099			
19		Attorneys for Defendant, City of Los			
20		Angeles			
21					
22					
23					
24					
25					
26					
27					
28					
	-	4 -			

Via Electronic Service	Via Electronic Service
Bart Alan Seemen, Esq. SBN 261895 Williams & Seemen	Keith M. Fromm
5900 Sepulveda Blvd., Suite 432	LAW OFFICES OF KEITH M. FROMM 907 Westwood Blvd., Suite 442
Sherman Oaks, CA 91411 Email: <u>bas@latrialteam.com</u>	Los Angeles, CA 90024 Tel: (310) 500-9960
Attorney for SHAMA ENTERPRISES,	E-mail: <u>keithfromm@aol.com</u>
LLC	Jeffrey Lee Costell Joshua S. Stambaugh
	Sara M. McDuffie COSTELL & ADELSON LAW CORP.
	100 Wilshire Blvd., Suite 700 Santa Monica, CA 90401
	Tel: (310) 458-5959
	E-mail: jlcostell@costell-law.com; jstambaugh@costell-law.com;
	smcduffie@costell-law.com
	5 -
-	J -



Make a Reservation

HOWARD JARVIS TAXPAYERS ASSOCIATION, et al. vs CITY OF LOS ANGELES, et al.

Case Number: 22STCV39662 Case Type: Civil Unlimited Category: Other Commercial Complaint (non-tort/non-complex)

Date Filed: 2022-12-21 Location: Stanley Mosk Courthouse - Department 72

Reservation				
Case Name: HOWARD JARVIS TAXPAYERS ASSOCIATION, et al. vs CITY OF LOS ANGELES, et al.	Case Number: 22STCV39662			
Type: Motion for Judgment on the Pleadings	Status: RESERVED			
Filing Party: Korean Immigrant Workers Advocates of Southern California (Real Party in Interest)	Location: Stanley Mosk Courthouse - Department 72			
Date/Time: 09/21/2023 8:30 AM	Number of Motions: 1			
Reservation ID: 760338369080	Confirmation Code: CR-QA424KQNCFZAAUNTU			
Fees				
Description	Fe	e Qty	Amount	
Motion for Judgment on the Pleadings	60.00	1	60.00	
Credit Card Percentage Fee (2.75%)	1.65	1	1.65	
TOTAL			\$61.65	
Payment				
Amount:	Туре:			
\$61.65	Visa			
Account Number: XXXX6539	Authorization: 096901			
Payment Date: 1969-12-31				

🚔 Print Receipt