1 2 3 4 5 6	ROHIT D. NATH (316062) HALLEY W. JOSEPHS (338391) ELLIE R. DUPLER (337607) SUSMAN GODFREY L.L.P. 1900 Avenue of the Stars, Suite 1400 Los Angeles, CA 90067-6029 <u>math@susmangodfrey.com</u> <u>hjosephs@susmangodfrey.com</u> <u>edupler@susmangodfrey.com</u> Telephone: (310) 789-3100 Facsimile: (310) 789-3150	CASSIDY BENNETT (347811) JONATHAN JAGER (318325) LEGAL AID FOUNDATION OF LOS ANGELES 7000 South Broadway Los Angeles, CA 90003 <u>cbennett@lafla.org</u> <u>jjager@lafla.org</u> Telephone: (213) 640-3835 Facsimile: (213) 640-3988
7 8 9 10 11 12 13	GIGI LAM (284233) NICHOLAS LAMPROS (299618) MATTHEW A. CALCANAS (341109) BET TZEDEK LEGAL SERVICES 3250 Wilshire Boulevard, 13 th Floor Los Angeles, CA 90010 glam@bettzedek.org nlampros@bettzedek.org mcalcanas@bettzedek.org Telephone: (323) 939-0506 Facsimile: (213) 471-4568	STEPHANO MEDINA (333506) FAIZAH MALIK (320479) ALISA RANDELL (293490) KATHRYN EIDMANN (268053) PUBLIC COUNSEL 610 South Ardmore Avenue Los Angeles, CA 90005 <u>smedina@publiccounsel.org</u> <u>fmalik@publiccounsel.org</u> <u>arandell@publiccounsel.org</u> <u>keidmann@publiccounsel.org</u> Telephone: (213) 385-2977 Facsimile: (213) 385-9089
14 15 16 17		HE STATE OF CALIFORNIA
18	COUNTY OF LOS ANGELES	
19 20 21	APARTMENT ASSOCIATION OF LOS ANGELES COUNTY, INC. (DBA APARTMENT ASSOCIATION OF GREATER LOS ANGELES,	Case No. 23STCP00720 Assigned For All Purposes To: Honorable Mitchell L. Beckloff Department 86
22 23	Petitioner and Plaintiff, vs.	STIPULATION OF THE PARTIES TO INTERVENTION AND [PROPOSED ORDER]
24 25 26	CITY OF LOS ANGELES; COUNCIL OF THE CITY OF LOS ANGELES AND DOES 1 TO 100, INCLUSIVE; Defendants and Respondents.	Complaint Filed: March 3, 2023
26 27		
28		

1		
1	The parties hereby stipulate and agree as follows:	
2	WHEREAS, this case challenges Ordinance No. 187763 and Ordinance No. 187764	
3	("Ordinances"), adopted by the Los Angeles City Council; and	
4	WHEREAS, Petitioner herein has challenged the validity of the Ordinances on the ground	
5	that the Ordinances are preempted by State law; and	
6	WHEREAS, Community Power Collective ("CPC") and InnerCity Struggle ("ICS")	
7	(collectively, "Intervenors") are community-based organizations who represent the interests of	
8	thousands of low-income tenants, who Intervenors allege will be negatively impacted in terms of	
9	health and access to housing should the Ordinances be invalidated; and	
10	WHEREAS, Intervenors were supporters of the Ordinances, and wish to intervene in this	
11	action in defense of the Ordinances; and	
12	WHEREAS, the existing parties are amenable thereto subject to the conditions contained	
13	herein;	
14	NOW, THEREFORE, THE PARTIES DO STIPULATE BY AND THROUGH THEIR	
15	RESPECTIVE COUNSEL AS FOLLOWS:	
16 17	1. Intervenors shall be allowed to intervene as defendants in this action.	
17	2. In consideration of Petitioner's agreement to this stipulation, Intervenors and	
18 19	Petitioner agree that neither Petitioner nor Intervenors will seek attorneys' fees against the other.	
19 20		
20 21	Dated: April 18, 2023 ROHIT D. NATH HALLEY W. JOSEPHS	
21	ELLIE R. DUPLER SUSMAN GODFREY L.L.P.	
22	GIGI LAM	
23 24	MATTHEW CALCANAS JEFFREY WEBB	
25	NICHOLAS LAMPROS BET TZEDEK LEGAL SERVICES	
26	CASSIDY BENNETT	
27	JONATHAN JAGER LEGAL AID FOUNDATION OF LOS	
28	ANGELES	
	2 STIPULATION OF THE PARTIES TO INTERVENTION AND [PROPOSED ORDER]	

1 2 3 4 5		STEPHANO MEDINA FAIZAH MALIK ALISA RANDELL KATHRYN EIDMANN PUBLIC COUNSEL By:
6		
7		Attorneys for Intervenors COMMUNITY POWER COLLECTIVE and
8		INNERCITY STRUGGLE
9	Dated:	DOUGLAS J. DENNINGTON
10		PETER J. HOWELL AMBER LES EDIV LECCIO
11		ERIK LEGGIO RUTAN & TUCKER, LLP 18575 Jamboree Road, 9th Floor
12		Irvine, CA 92612 Telephone: 714-641-5100 Facsimile: 714-546-9035
13		By: <u>/s/ 144 // 164 // 1600</u>
14		Attorneys for Petitioner/Plaintiff
15 16		APARTMENT ASSOCIATION OF GREATER LOS ANGELES COUNTY, INC. dba APARTMENT ASSOCIATION OF GREATER LOS ANGELES
17	Dated: April 18, 2023	HYDEE FELDSTEIN SOTO
18		ELAINE ZHONG MEI-MEI CHENG OFFICE OF THE LOS ANGELES CITY
19		ATTORNEY
20		Olen
21		By: <u>/s/</u>
22		Attorneys for Respondents/Defendants CITY OF LOS ANGELES; COUNCIL OF THE CITY OF LOS
23		ANGELES
24		
25		
26		
27		
28	STIPULATION OF THE PARTIES TO	3 D INTERVENTION AND [PROPOSED ORDER]

1	
2	[PROPOSED] ORDER
3	Pursuant to the stipulation of the parties, CPC and ICS are hereby permitted to intervene as
4	defendants in this action on the terms specified in the parties' stipulation.
5	DATED:
6	Honorable Mitchell L. Beckloff
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	
25	
26	
27	
28	4 STIPULATION OF THE PARTIES TO INTERVENTION AND [PROPOSED ORDER]

1	PROOF OF SERVICE		
2	I, the undersigned, declare:		
3 4	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 1900 Avenue of the Stars, Suite 1400, Los Angeles, California 90067-6029.		
5	On April 18, 2023, I served the foregoing document(s) described as follows:		
6	STIPULATION OF THE PARTIES TO INTERVENTION AND [PROPOSED ORDER]		
7 8	on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes addressed as stated on the attached service list, as follows:		
9	SEE ATTACHED SERVICE LIST		
 10 11 12 12 	BY MAIL: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Los Angeles, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is		
13 14 15	 more than one day after date of deposit for mailing in affidavit. BY PERSONAL SERVICE: I caused to be delivered such envelope by hand to the offices of the addressee. 		
16	□ BY FEDERAL EXPRESS OR OVERNIGHT COURIER		
 17 18 19 20 21 	BY ELECTRONIC MAIL I caused said documents to be prepared in portable document format (PDF) for e-mailing and uploading the document listed above to the Court's Electronic Filing Service Provider (First Legal <u>https://www.firstlegal.com/or</u> One Legal <u>https://www.onelegal.com/</u>) for e- service to the email address(es) set forth on the attached service list. To my knowledge, the e-service was reported as complete and without error. See Cal. R. Ct. R. 2.251 and		
22	Executed on April 18, 2023, Los Angeles, California.		
23 24 25	(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.		
26 27 28	Jerod Williams /s/ Jerod Williams Typed Name Signature		
20	PROOF OF SERVICE		

1 **SERVICE LIST** 2 **GIGI LAM** MATTHEW CALCANAS 3 JEFFREY WEBB NICHOLAS LAMPROS **BET TZEDEK LEGAL SERVICES** 4 3250 Wilshire Boulevard, 13th Floor 5 Los Angeles, CA 90010 Telephone: (323) 648-4706 6 Facsimile: (213) 471-4568 glam@bettzedek.org mcalcanas@bettzedek.org 7 jwebb@bettzedek.org nlampros@bettzedek.org 8 Attorneys for Intervenors 9 **COMMUNITY POWER COLLECTIVE** and INNERCITY STRUGGLE 10 STEPHANO MEDINA 11 FAIZAH MALIK ALISA RANDELL 12 KATHRYN EIDMANN PUBLIC COUNSEL 13 610 South Ardmore Avenue Los Angeles, CA 90005 14 Telephone: (213) 385-2977 Facsimile: (213) 385-9089 smedina@publiccounsel.org 15 keidmann@publiccounsel.org 16 fmalik@publiccounsel.org Attorneys for Intervenors 17 **COMMUNITY POWER COLLECTIVE** and INNERCITY STRUGGLE 18 **DOUGLAS J. DENNINGTON** 19 PETER J. HOWELL AMBER LES 20 ERIK LEGGIO **RUTAN & TUCKER, LLP** 18575 Jamboree Road, 9th Floor 21 Irvine, CA 92612 Telephone: (714) 641-5100 22 Facsimile: (714) 546-9035 23 ddennington@rutan.com phowell@rutan.com 24 ales@rutan.com eleggio@rutan.com Attorneys for Petitioner/Plaintiff 25 APARTMENT ASSOCIATION OF 26 **GREATER LOS ANGELES COUNTY, INC. dba APARTMENT ASSOCIATION OF GREATER LOS ANGELES** 27 28

CASSIDY BENNETT JONATHAN JAGER LEGAL AID FOUNDATION OF LOS ANGELES 7000 South Broadway Los Angeles, CA 90003 Telephone: (213) 640-3835 Facsimile: (213) 471-4568 cbennett@lafla.org jjager@lafla.org Attorneys for Intervenors COMMUNITY POWER COLLECTIVE and INNERCITY STRUGGLE

HYDEE FELDSTEIN SOTO, City Attorney MEI-MEI CHENG ELAINE ZHONG **OFFICE OF THE LOS ANGELES CITY ATTORNEY** City Hall, 200 North Spring Street, 21st Floor

Los Angeles, CA 90012 Telephone: (213) 922-7715 Facsimile: (213) 978-7957 Elaine.Zhong@lacity.org Attorneys for Respondent CITY OF LOS ANGELES (sued as "CITY OF LOS ANGELES; COUNSEL OF THE CITY OF LOS ANGELES)