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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF LOS ANGELES

APARTMENT ASSOCIATION OF LOS
ANGELES COUNTY, INC. (DBA
APARTMENT ASSOCIATION OF
GREATER LOS ANGELES),

Petitioner,

vs.

CITY OF LOS ANGELES; COUNCIL OF
THE CITY OF LOS ANGELES AND
DOES 1 TO 100, INCLUSIVE;

Respondents.

Case No. 23STCP00720

Assigned For All Purposes To:
Honorable Mitchell L. Beckloff
Department 86

**DECLARATION OF ANABELLA SAM
IN SUPPORT OF INTERVENORS'
OPPOSITION TO OPENING BRIEF**

Date: November 8, 2023
Time: 9:30 a.m.
Dept: 86

Complaint Filed: March 3, 2023

Electronically FILED by
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David W. Slayton,
Executive Officer/Clerk of Court,
By A. Lopez, Deputy Clerk

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DECLARATION OF ANABELLA SAM

I, ANABELLA SAM, declare that I have personal knowledge of the facts stated in this declaration, and if called as a witness, I could testify competently as follows:

1. I am over 18 years of age.
2. Until September 2022, I lived in the South Central neighborhood of the City of Los Angeles, with my husband and three minor children in a two-bedroom single family home. We lived there for approximately five years. Our monthly rent never increased from \$800 for the entire time that we lived there. The rental unit was not subject to the City’s Rent Stabilization Ordinance.
3. I was illegally locked out of my home on September 3, 2022. My family and I had to live out of our car for three months while we searched for another place to stay. We didn’t have any option but to stay in our car because we didn’t have any savings, and the local shelters were full or unable to accommodate an entire family.
4. After enduring three months of living in our car, we made the difficult decision to use our credit cards to book a hotel room, because living in our car became increasingly uncomfortable and unsafe. Our housing situation remained uncertain as we hopped between different temporary accommodations. We spent 15 days in a hotel and over two months in an AirBnb. Thankfully, we received some help from our church and support from social services which helped covered some of the costs. However, the expenses for temporary housing during this difficult period added up to \$7,500.
5. It was no longer affordable for us to stay in the South Central area where our children attended school, and where our work, church, doctors, and friends were all located. During our search, a 2-bedroom apartment in South Central was on average renting for \$2,500, and we could not afford to spend more than \$1,700 on rent. Many places asked for two months of rent upfront in addition to a security deposit equal to one month’s rent. We could not find a one-bedroom apartment that would accommodate our family of five.


1 6. After five months without permanent housing and many apartment applications, we
2 finally found a 1-bedroom apartment in Unincorporated East Los Angeles where the five of us have
3 lived for the past six months. The monthly rent is \$1,700, and our security deposit was \$2,400.

4 7. It would have greatly helped my family to receive relocation assistance. In addition to
5 the \$10,150 spent on temporary housing, application fees, and the security deposit, we paid \$2,000 for
6 a storage unit for four months and an additional \$2,000 in moving costs. These expenses led to credit
7 card debt to pay and collections.
8

9 8. In addition to all of the moving and relocation costs, losing our former housing also has
10 ongoing financial costs for my family. My husband had to resign from his long-term, full-time job in
11 South Central because the instability of our housing situation became too overwhelming. He now
12 commutes approximately 40 miles per day to North Hollywood for a part-time job that does not pay
13 enough to cover our family’s expenses. I also lost my job in South Central and recently began
14 receiving CalWORKs. Prior to moving, our monthly household income was about \$2,600. Our
15 current monthly income is about \$1,830.
16

17 9. The foregoing was read to me by Claire Shaw on October 5, 2023, in Spanish, a
18 language that I speak fluently. I understood and verified its content in full. I declare under penalty of
19 perjury under the laws of the State of California that the foregoing is true and correct. Executed on
20 the date below, in the city of Los Angeles, California.
21

22
23
24 DATED: 10/5/2023 | 4:09 PM PDT

DocuSigned by:

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Declarant, ANABELLA SAM

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PROOF OF SERVICE

I, the undersigned, declare:

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.

On October 9, 2023, I served the foregoing document(s) described as follows:

**DECLARATION OF ANABELLA SAM IN SUPPORT OF INTERVENORS’
OPPOSITION TO OPENING BRIEF**

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:

SEE ATTACHED SERVICE LIST

- 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 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.
- BY FEDERAL EXPRESS OR OVERNIGHT COURIER
- 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 <https://www.firstlegal.com/or> One Legal <https://www.onelegal.com/>) 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 CCP § 1010.6.

Executed on October 9, 2023, Los Angeles, California.

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

Ellie Dupler
Typed Name

/s/ Ellie Dupler
Signature

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