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25 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
26 **COUNTY OF LOS ANGELES**

27 APARTMENT ASSOCIATION OF LOS  
28 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 HEIDI  
GONZALEZ IN SUPPORT OF  
INTERVENORS' OPPOSITION TO  
OPENING BRIEF**

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

Complaint Filed: March 3, 2023

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21 **INNER CITY STRUGGLE**

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I, Heidi Gonzalez, here by 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 lived with my daughter Sarita, a minor child, at 936 ½ S. Normandie Avenue, Los Angeles 90006. We lived there for a year and a half. My monthly rent was \$1200. The apartment had two and a half bedrooms.
2. I owed back rent from September and October 2021 totaling \$2400.
3. In October 2021, my landlord filed an eviction against me despite the Covid protections in place at the time.
4. My landlord did not offer me relocation assistance, but I knew what rights I had and demanded it. I needed relocation assistance because it is too expensive to live in Los Angeles.
5. On June 7, 2022, my landlord and I entered into an agreement regarding relocation expenses and a move out. We agreed that he would pay me \$21,000.00 in total and that it would come to me in three checks. That same day he gave me a check for \$10,000.00. We agreed that the second check would arrive on the first of August (\$5,000.00), and the third check on the first of October (\$6,000.00), but I never received them. We agreed that I would move out of the apartment on October 31, 2022.
6. When all of this was going on, I lost both of my jobs and it became too complicated for me to save money to finance my move. It is almost impossible to move within 90 days.
7. First of all, the requirements to get a new unit are too much. They ask you to prove that you have three times the rent, and that you have a stable job. They ask you to have checks for 6 months to prove that you have a stable source of income. They ask that the credit be over seven hundred. They ask for a deposit and ask for the first month and the last month's rent.
8. It is too expensive to pay for the move into a new unit and that doesn't even account for the expenses involved with moving.

9. When this happened in 2021 and 2022, I was homeless. We had to live in hotels for a while and get support from friends and family while I tried to find housing. I do not want that to ever happen to my daughter and I again.
10. We found a new place to live for now, but our rent is \$1000, and we have only a studio.
11. Having this happen again worries me a lot. I don't want to be in this situation. Right now, I don't have to think about having my rent increased more than 10%, but I also don't trust the landlords not to raise it anyway.
12. Especially as a single mother with a young daughter, it is very hard to move, and I do not want to lose our community by moving far away or becoming homeless again.

I declare under penalty of perjury of the laws of the State of California that the foregoing is true and correct. Executed on September 28, 2023 in Los Angeles, California.

Dated: September 28, 2023

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'L. Gonzalez', is written above a horizontal line.

Declarant

**DECLARATION OF INTERPRETER (if necessary)**

I, Ruben Moreno, declare as follows:

1. Heidi Gonzalez is unable to read or understand this declaration because her primary language is Spanish.
2. I am fluent in the Spanish and English languages.
3. I read or translated the foregoing document, to the best of my ability, from English to Spanish in her. She understood the document and I witnessed/her the document.

Dated: September 28, 2023

Respectfully submitted,



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Interpreter

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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 HEIDI GONZALEZ 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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