| 1 | STEPHANO MEDINA (333506) | | |
|----|--|--|-------------|
| 2 | ALISA RANDELL (293490) JONATHAN JAGER (318325) | Electronically FILED b | y formio |
| 3 | FAIZAH MALIK (320479) KATHRYN EIDMANN (268053) | Superior Court of Cali County of Los Angeles 10/09/2023 10:07 AM | |
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| 17 | (Additional Counsel on Following Page) | INNER CITT STRUGGLE | |
| 18 | SUPERIOR COURT OF T | THE STATE OF CALIFORNIA | |
| 19 | COUNTY OI | F LOS ANGELES | |
| 20 | APARTMENT ASSOCIATION OF LOS | Case No. 23STCP00720 | |
| 21 | ANGELES COUNTY, INC. (DBA APARTMENT ASSOCIATION OF | Assigned For All Purposes To: Honorable Mitchell L. Beckloff | |
| 22 | GREATER LOS ANGELES), | Department 86 | |
| 23 | Petitioner, | DECLARATION OF SILVIA | |
| 24 | VS. | ANGUIANO IN SUPPORT OF | |
| 25 | CITY OF LOS ANGELES; COUNCIL OF | INTERVENORS' OPPOSITION T OPENING BRIEF | 'O |
| 26 | THE CITY OF LOS ANGELES AND DOES 1 TO 100, INCLUSIVE; | Date: November 8, 2023 | |
| 27 | Respondents. | Time: 9:30 a.m. Dept: 86 | |
| 28 | | Complaint Filed: March 3, 2023 | |
| | | | |

DECLARATION OF SILVIA ANGUIANO ISO INTERVENORS' OPPOSITION TO OPENING BRIEF

| 1 | |
|----|--|
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| - | DECLARATION OF SILVIA ANGUIANO ISO INTERVENORS' OPPOSITION TO OPENING BRIEF |
| | DECLARATION OF SILVIA ANGUIANO ISO INTERVENORS OPPOSITION TO OPENING BRIEF |

| 1 | DECLARATION OF SILVIA ANGUIANO | |
|----|---|--|
| 2 | I, SILVIA ANGUIANO, declare that I have personal knowledge of the facts stated in this | |
| 3 | declaration, and if called as a witness, I could testify competently as follows: | |
| 4 | 1. I am over 18 years of age. | |
| 5 | 2. I live with my 17-year-old son in the North Hills neighborhood of Los Angeles, | |
| 6 | California. We live in an apartment with one bedroom, and have lived there for approximately four | |
| 7 | years. | |
| 8 | 3. My monthly rent is \$940. | |
| 9 | 4. On September 1, 2023, my landlord gave me a notice saying that he would be | |
| 10 | increasing my rent by \$141 per month, to \$1,081 per month. That is an increase of 15 percent of my | |
| 11 | current rent. | |
| 12 | 5. I cannot afford to pay that much in rent. I rely on social security for income to support | |
| 13 | myself and my son, along with picking up part-time work when I can. This barely covers our current | |
| 14 | expenses each month, and I do not have any other consistent sources of income. I might be able to | |
| 15 | stretch that money to cover a slight increase in rent, but there is no way I can afford so much more | |
| 16 | monthly. | |
| 17 | 6. I do not want to move. My son and I feel connected to the community in our building, | |
| 18 | as I have come to feel like we have a real and meaningful relationship with the other tenants. | |
| 19 | However, when my rent increases beyond what I can pay, I will likely be forced to move. | |
| 20 | 7. My landlord has not offered me any relocation assistance to help me move. | |
| 21 | 8. I need relocation assistance because moving is very expensive. Any apartment will ask | |
| 22 | for at least the first month's rent along with a deposit, and possibly an additional month's rent or last | |
| 23 | month's rent on top of that. That doesn't even account for the expenses involved with physically | |
| 24 | moving from one apartment to another. I have no savings that could help me cover these costs. | |
| 25 | 9. I am very worried that I will not be able to find another affordable apartment before we | |
| 26 | are forced out of our current home. | |
| 27 | | |
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DECLARATION OF SILVIA ANGUIANO

| 1 | I declare under the penalty of perjury under the laws of the State of California that the |
|----|---|
| 2 | foregoing is true and correct. Executed on the date below, in the city of Los Angeles, California |
| 3 | |
| 4 | 10/5/2023 8:13 PM PDT |
| 5 | DATED: |
| 6 | SILVIA ANGUIANO |
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| | DECLARATION OF SILVIA ANGUIANO |

| 1 | PROOF OF SERVICE | | |
|----------------------|--|--|--|
| 2 | I, the undersigned, declare: | | |
| 3 | 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, | | |
| 4 | Los Angeles, California 90067-6029. On October 9, 2023, I served the foregoing document(s) described as follows: | | |
| 5 | DECLARATION OF SILVIA ANGUIANO IN SUPPORT OF INTERVENORS' | | |
| 6 | OPPOSITION TO OPENING BRIEF | | |
| 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 | BY MAIL: I am "readily familiar" with the firm's practice of collection and processing | | |
| 11 | 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, | | |
| 12 | 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 | more than one day after date of deposit for mailing in affidavit. | | |
| 14 | BY PERSONAL SERVICE: I caused to be delivered such envelope by hand to the offices of the addressee. | | |
| 15 | □ BY FEDERAL EXPRESS OR OVERNIGHT COURIER | | |
| 16 | BY ELECTRONIC MAIL | | |
| 17 | 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 | | |
| 18 19 | (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, | | |
| 20 | the e-service was reported as complete and without error. See Cal. R. Ct. R. 2.251 and CCP § 1010.6. | | |
| 20 | Executed on October 9, 2023, Los Angeles, California. | | |
| 22 | | | |
| 23 | (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct. | | |
| 23 24 | | | |
| 2 - 25 | Ellie Dupler /s/ Ellie Dupler | | |
| | Typed Name Signature | | |
| 26 27 | | | |
| 27 | | | |
| 28 | PROOF OF SERVICE | | |
| | | | |

| 1 | SERVI |
|----|---|
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| 27 | INC. dba APARTMENT ASSOCIATION OF GREATER LOS ANGELES |
| 28 | |
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COMMUNITY POWER COLLECTIVE and INNERCITY STRUGGLE

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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)**