

1 STEPHANO MEDINA (333506)  
2 ALISA RANDELL (293490)  
3 JONATHAN JAGER (318325)  
4 FAIZAH MALIK (320479)  
5 KATHRYN EIDMANN (268053)

6 **PUBLIC COUNSEL**  
7 610 South Ardmore Avenue  
8 Los Angeles, CA 90005  
9 [smedina@publiccounsel.org](mailto:smedina@publiccounsel.org)  
10 [arandell@publiccounsel.org](mailto:arandell@publiccounsel.org)  
11 [jjager@publiccounsel.org](mailto:jjager@publiccounsel.org)  
12 [fmalik@publiccounsel.org](mailto:fmalik@publiccounsel.org)  
13 [keidmann@publiccounsel.org](mailto:keidmann@publiccounsel.org)  
14 Telephone: (213) 385-2977  
15 Facsimile: (213) 385-9089

16 GIGI LAM (84233)  
17 MATTHEW CALCANAS (341109)  
18 JEFFREY WEBB (145750)  
19 NICHOLAS LAMPROS (299618)  
20 **BET TZEDEK LEGAL SERVICES**  
21 3250 Wilshire Boulevard, 13th Floor  
22 Los Angeles, CA 90010  
23 [glam@bettzedek.org](mailto:glam@bettzedek.org)  
24 [mcalcanas@bettzedek.org](mailto:mcalcanas@bettzedek.org)  
25 [jwebb@bettzedek.org](mailto:jwebb@bettzedek.org)  
26 [nlampros@bettzedek.org](mailto:nlampros@bettzedek.org)  
27 Telephone: (323) 648-4706  
28 Facsimile: (213) 471-4568

*Attorneys for Intervenors*  
COMMUNITY POWER COLLECTIVE and INNER CITY STRUGGLE  
(Additional Counsel on Following Page)

**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 TAKEYSHIA  
FLEMINGS 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  
Superior Court of California,  
County of Los Angeles  
10/09/2023 10:07 AM  
David W. Slayton,  
Executive Officer/Clerk of Court,  
By A. Lopez, Deputy Clerk

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

CASSIDY BENNETT (347811)  
**LEGAL AID FOUNDATION OF LOS ANGELES**  
7000 South Broadway  
Los Angeles, CA 90003  
[cbennett@lafla.org](mailto:cbennett@lafla.org)  
Telephone: (213) 640-3835  
Facsimile: (213) 471-4568

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  
[rmath@susmangodfrey.com](mailto:rmath@susmangodfrey.com)  
[hjosephs@susmangodfrey.com](mailto:hjosephs@susmangodfrey.com)  
[edupler@susmangodfrey.com](mailto:edupler@susmangodfrey.com)  
Telephone: (310) 789-3100  
Facsimile: (310) 789-3150

*Attorneys for Intervenors*  
COMMUNITY POWER COLLECTIVE and  
INNER CITY STRUGGLE


I, Takeyshia Flemings, 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 live with my two children and my niece, all minors, at 2906 Potomac Avenue, Los Angeles, California 90016. It is a three-bedroom home. I have lived here for fifteen years.
2. On August 1, 2023, the monthly rent increased to \$4,300. I have a Section 8 voucher. My portion of the rent was \$400 and is now \$1067. The Housing Assistance Portion (“HAP”) is paid by the Housing Authority of the County of Los Angeles (“HACLA”).
3. On August 1, 2023, I did not pay my portion of the rent, \$1067.
4. On or around August 7, 2023, I was served a three-day notice to pay or quit.
5. On or around August 17, 2023, I was served a Summons and Complaint based on the failure to pay the \$1067 portion.
6. I am currently fighting my case against my landlord to stay in my home as I am protected by the Nonpayment Threshold Ordinance.
7. If the ordinance were no longer in place, I could already have been evicted and myself, my two children, and my niece would be homeless.
8. Finding new housing is incredibly difficult, especially as a Section 8 Voucher recipient looking for a three-bedroom home in our West Adams neighborhood so that my children and niece can stay at their same school, and we are not all displaced from our community.

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,

  
Takeyshia Flemings (Sep 28, 2023 14:02 PDT)  
Declarant

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**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 TAKEYSHIA FLEMINGS 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

**SERVICE LIST**

1  
2 GIGI LAM  
3 MATTHEW CALCANAS  
4 JEFFREY WEBB  
5 NICHOLAS LAMPROS  
6 **BET TZEDEK LEGAL SERVICES**  
7 3250 Wilshire Boulevard, 13<sup>th</sup> Floor  
8 Los Angeles, CA 90010  
9 Telephone: (323) 648-4706  
10 Facsimile: (213) 471-4568  
11 [glam@bettzedek.org](mailto:glam@bettzedek.org)  
12 [mcalcanas@bettzedek.org](mailto:mcalcanas@bettzedek.org)  
13 [jwebb@bettzedek.org](mailto:jwebb@bettzedek.org)  
14 [nlampros@bettzedek.org](mailto:nlampros@bettzedek.org)  
15 *Attorneys for Intervenors*  
16 **COMMUNITY POWER COLLECTIVE**  
17 **and INNERCITY STRUGGLE**

10 STEPHANO MEDINA  
11 KATHRYN EIDMANN  
12 FAIZAH MALIK  
13 JONATHAN JAGER  
14 **PUBLIC COUNSEL**  
15 610 South Ardmere Avenue  
16 Los Angeles, CA 90005  
17 Telephone: (213) 385-2977  
18 Facsimile: (213) 385-9089  
19 [smedina@publiccounsel.org](mailto:smedina@publiccounsel.org)  
20 [keidmann@publiccounsel.org](mailto:keidmann@publiccounsel.org)  
21 [fmalik@publiccounsel.org](mailto:fmalik@publiccounsel.org)  
22 [jjager@publiccounsel.org](mailto:jjager@publiccounsel.org)  
23 *Attorneys for Intervenors*  
24 **COMMUNITY POWER COLLECTIVE**  
25 **and INNERCITY STRUGGLE**

19 DOUGLAS J. DENNINGTON  
20 PETER J. HOWELL  
21 AMBER LES  
22 ERIK LEGGIO  
23 **RUTAN & TUCKER, LLP**  
24 18575 Jamboree Road, 9<sup>th</sup> Floor  
25 Irvine, CA 92612  
26 Telephone: (714) 641-5100  
27 Facsimile: (714) 546-9035  
28 [ddennington@rutan.com](mailto:ddennington@rutan.com)  
[phowell@rutan.com](mailto:phowell@rutan.com)  
[ales@rutan.com](mailto:ales@rutan.com)  
[eleggio@rutan.com](mailto:eleggio@rutan.com)  
*Attorneys for Petitioner/Plaintiff*  
**APARTMENT ASSOCIATION OF  
GREATER LOS ANGELES COUNTY,  
INC. dba APARTMENT ASSOCIATION  
OF GREATER LOS ANGELES**

CASSIDY BENNETT  
**LEGAL AID FOUNDATION OF LOS  
ANGELES**  
7000 South Broadway  
Los Angeles, CA 90003  
Telephone: (213) 640-3835  
Facsimile: (213) 471-4568  
[cbennett@lafla.org](mailto:cbennett@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, 21<sup>st</sup> Floor  
Los Angeles, CA 90012  
Telephone: (213) 922-7715  
Facsimile: (213) 978-7957  
[Elaine.Zhong@lacity.org](mailto:Elaine.Zhong@lacity.org)  
*Attorneys for Respondent*  
**CITY OF LOS ANGELES (sued as “CITY  
OF LOS ANGELES; COUNSEL OF THE  
CITY OF LOS ANGELES)**