Plaintiffs submit the following proposed witness list pursuant C.D. Cal. Local Rule 16-5. Plaintiffs intend to call the following witnesses to provide testimony at the trial in this matter. In addition, Plaintiffs reserve the right to call witnesses proposed by Defendants, and to call rebuttal and/or impeachment witnesses in response to testimony provided by Defendants. Plaintiffs have provided their best estimate as to the general order of witnesses, however, the order may be subject to change based upon the availability of witnesses and scheduling during trial.

The nature of testimony is a broad, general description of anticipated testimony, and is not intended to limit more specific testimony relevant to the case. Additionally, direct examination estimates are good faith estimates of anticipated testimony but are not intended to limit the evidence Plaintiffs' intend to offer to support their positions. Plaintiffs reserve their rights to put on additional testimony and exceeding the estimated examination times to the extent necessary to rebut the evidence submitted by Defendants.

Witness Name	Party	Nature of Testimony	<b>Estimate for</b>
			Direct
			Examination
Shad Meshad	Plaintiffs	Mr. Meshad is the Founder and President of the National Veterans Foundation ("NVF"). NVF is a veteran-run organization located in Los Angeles that provides lifesustaining services for veterans throughout the country, but in particular for unhoused veterans living on the streets of Los Angeles. The NVF's Homeless Veteran Outreach Program provides outreach missions each week to areas of Los Angeles with high concentrations of homeless	1 hour
		individuals to assist unhoused veterans living in encampments	

		and other circumstances obtain food, water, and, for the past few years, supplies to reduce the likelihood of contracting COVID-19. The Street Outreach team identifies homeless veterans and works to get them into programs that will get them off the streets. This work is an integral part of NVF's mission to stop veteran suicide, the rates of which are double that of non-veteran	
Robert Reynolds	Plaintiffs	counterparts.  Mr. Reynolds is a veteran and currently an independent contractor for Concourse Federal. Mr.  Reynolds is intimately familiar with Plaintiffs and their housing situation and is expected to provide testimony regarding his attempts to assist homeless veterans obtain housing, including daily outreach to homeless veterans. He is an advocate for veterans and will testify regarding his efforts to unsuccessfully work with Federal	1 hour
Joshua Petitt	Plaintiffs	Defendants and the problems that continue to persist.  Mr. Petitt is a veteran with a 100% service-connected disability rating.  Mr. Petitt is expected to provide testimony about his efforts to obtain treatment and permanent supportive housing from Federal Defendants and the obstacles that	30 minutes
Lavon Johnson	Plaintiffs	he has encountered in trying to obtain treatment for his service-connected disability.  Mr. Johnson is a veteran with a 100% service-connected disability rating. Mr. Johnson is expected to	30 minutes

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		provide testimony about his efforts to obtain treatment and permanent supportive housing from Federal Defendants and the obstacles that he has encountered in trying to obtain treatment for his service-connected disability, including the AMI Rule.	
Joseph Fields	Plaintiffs	Mr. Fields is an Army veteran with a 100% service-connected disability rating. He is expected to testify about his efforts to obtain treatment and housing from VAGLAHS and the obstacles he has encountered in trying to obtain treatment for his service-connected disability.	30 minutes
Jeffrey Powers	Plaintiffs	Mr. Powers is a veteran with a 90% service-connected disability rating. Mr. Powers is expected to provide testimony about his efforts to obtain treatment and permanent supportive housing from Federal Defendants and the obstacles that he has encountered in trying to obtain treatment for his service-connected disability.	30 minutes
Laurieann Wright	Plaintiffs	Ms. Wright is a veteran with a 100% service-connected disability rating. Ms. Wright is expected to provide testimony about her efforts to obtain treatment and permanent supportive housing from Federal Defendants and the obstacles that she has encountered in trying to obtain treatment for her service-connected disability, including having to travel from Lancaster, California to the WLAVA Campus because of the lack of available	30 minutes

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		and appropriate housing near the	
C 11 II '44	D1 ' 4'CC	campus.	1 1
Sally Hammitt	Plaintiffs	Ms. Hammitt is the Chief of the	1 hour
		Community Engagement &	
		Reintegration Service at	
		VAGLAHS. She is expected to	
		testify about the by-name list and	
		the number of homeless veterans in	
		the Greater Los Angeles Area. In	
		addition, Ms. Hammit is expected	
		to provide testimony regarding the	
		services that VAGLAHS provides	
		to homeless veterans and the	
		efforts to secure housing for	
		veterans.	
John Kuhn	Plaintiffs	Mr. Kuhn is the Deputy Medical	1.5 hours
		Center Director of VAGLAHS.	
		Mr. Kuhn is responsible for the	
		VA's efforts in providing housing	
		and services to homeless veterans	
		in the Greater Los Angeles area,	
		including efforts to secure	
		permanent housing and temporary	
		housing to homeless veterans.	
Steven Braverman	Plaintiffs	Dr. Braverman is the Interim VISN	1.5 hours
		22 Network Director of the VA	
		Desert Pacific Healthcare Network.	
		He was previously appointed as the	
		Medical Center Director of the	
		VAGLAHS. He is expected to	
		provide testimony regarding the	
		operations of VAGLAHS and	
		activities as well as the	
		implantation of the master plans	
		for the WLA Grounds.	
Keith Harris	Plaintiffs	Mr. Harris is the Senior Executive	1 hour
ixim Hallis	1 10111111113	Homelessness Agent for	1 Houi
		VAGLAHS. He is expected to	
		provide testimony regarding the	
		implementation of the master plan	
		on the WLA Grounds and the	
		on the WLA Orounds and the	

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		supervision of employees who provide outreach, case management, health care, and housing services to veterans experiencing or at risk of homelessness.	
Michael Dennis*	Plaintiffs	Mr. Dennis is the Senior Program Advisor of the Office of Public Housing & Voucher Programs. Mr. Dennis is expected to provide testimony on the HUD-VASH Program along with HUD's partnership with the local public housing authorities for the distribution of HUD-VASH vouchers.	1 hour
Alan Trinh	Plaintiffs	Mr. Trinh is the acting Executive Director for Ambulatory Care for VAGLAHS. Prior to his current position, Mr. Trinh was the Chief of the Office of Strategic, Facility and Master Planning and oversaw the development and implementation of the master plan including the infrastructure for the construction projects on the campus.	1 hour
Brett Simms	Plaintiffs	Mr. Simms is the Executive Director of the Office of Asset Enterprise Management. Mr. Simms is knowledgeable about the VA's enhanced used lease program and the construction of housing on the WLA Grounds and is expected to provide testimony on such issues.	1 hour
Steve Soboroff	Plaintiffs	Mr. Soboroff has worked on real estate projects spanning 5 decades and has been devoted his career to "finish line" implementation by breaking down extremely complex	1.5 hours

projects into simple day-by-day 1 tasks to achieve project comple-2 tion. He is expected to provide expert testimony regarding the cur-3 rent use of the WLAVA Campus 4 and what can be done to use the property effectively to provide a 5 community which include quality 6 temporary housing, an increase in permanent housing, and other im-7 portant services and facilities for 8 homeless veterans. In particular, Mr. Soboroff will identify sites for 9 the placement of temporary sup-10 portive housing units, the overview of the planning and execution of 11 the project for housing on the 12 WLAVA Campus, the need for more permanent supportive hous-13 ing, and the inadequacies of the 14 current master plan and concept. Randy Johnson Mr. Johnson is a real estate devel-**Plaintiffs** 1.5 hours 15 oper with over 40 years of experi-16 ence. He is expected to provide expert testimony regarding the exist-17 ing situation on the WLAVA Cam-18 pus and what can be done to use the property effectively to provide 19 both temporary and permanent 20 housing on the property to help alleviate veteran homelessness. 21 Benjamin **Plaintiffs** Dr. Henwood is a licensed clinical 2 hours 22 Henwood social worker and the Frances L. and Robert G. Feldman Professor 23 of Social Policy and Health at the 24 University of Southern California. He is expected to provide expert 25 testimony regarding the definition 26 of permanent supportive housing, the target population that 27 permanent supportive housing was 28

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2 hours

1 hour

1.5 hours

designed to serve, the evidence 1 based for permanent supportive 2 housing, key elements for its effectiveness, and its importance to 3 addressing veteran homelessness. 4 Jonathan Sherin **Plaintiffs** Dr. Sherin is a board-certified Psychiatrist and Neurologist. He 5 has dedicated his life to the study 6 and eradication of homelessness, and in particular, the eradication of 7 homelessness among veterans. Dr. 8 Sherin is expected to provide expert testimony regarding the 9 inadequate response of the VA to 10 veteran homelessness, the development of an intentional 11 community of the WLAVA 12 Campus, the targeting of multiple veteran populations to prevent 13 unacceptable outcomes, the urgent 14 need to develop temporary housing units, the creation of permanent 15 housing units, and the creation and 16 expansion of a full range of resources and services for 17 homeless veterans. 18 Steven Durham\* **Plaintiffs** Mr. Durham is the Director of Housing Voucher Programs and is 19 expected to provide testimony on 20 the policies and procedures of the **HUD-VASH Program along with** 21 HUD's partnership with the local 22 public housing authorities for the distribution of HUD-VASH 23 vouchers 24 Dennis Culhane **Plaintiffs** Dr. Culhane is a Professor at the University of Pennsylvania. He is 25 expected to provide testimony 26 concerning the homelessness crisis 27 in Los Angeles, and the quality of the HUD-VASH program's (in-) 28

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1			effectiveness in addressing or	
			resolving that crisis. He is also	
2			expected to testify that the veteran	
3			homelessness crisis in Los Angeles	
4			has not been abated by either the	
4			VA's or the County/City of Los	
5			Angeles' initiatives, and that the	
6			HUD-VASH program is not working to resolve the veteran	
			homelessness crisis either, both	
7			based upon the number of exits	
8			compared to entries into the	
9			program, and because of the	
			inadequacy of the case	
10			management function provided by	
11			the VA. He will base this	
12			testimony on facts presented to him	
			through public records and	
13			information made available by the	
14			VA itself, as well as through his experience working for the VA.	
15	Andrew Carrillo	Plaintiffs	Mr. Carrillo is a Member of the	1 hour
13	Tindiew Carrino	T Idilitiis	Board of Directors of the Bandini	1 Hour
16			Foundation. Mr. Carillo was also	
17			previously the President of the	
10			Santa Monica Historical Society	
18			and the President of Los	
19			Californianos. Mr. Carrillo is	
20			expected to testify about the	
			historical use of the WLA	
21			Grounds, the 388-acre parcel that was donated to the VA.	
22	William DePuy	Plaintiffs	Mr. DePuy is General Counsel for	30 minutes
23	, i i i i i i i i i i i i i i i i i i i		Intervenor Bridgeland Resources,	
			LLC ("Bridgeland"). Mr. DePuy is	
24			expected to provide testimony on	
25			behalf of Bridgeland, including the	
26			amount of revenue generated from	
			Bridgeland's operations on the	
27			WLA Campus and the purpose of	
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PLAINTIFFS' WITNESS LIST

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	the Bridgeland's operations on the WLA Campus.	
S	Ms. Lares is the Chief Programs	1 hour
	Officer at HACLA. Ms. Lares is	
	expected to testify about Federal	
	Defendants' partnership with local	
	public housing authorities relating	
	to the HUD-VASH program,	
	including but not limited to, the	
	implementation of the HUD-	
	VASH program, the voucher	
	referral process, the number of	
	veterans in the HUD-VASH	
	program, and the utilization or lack thereof of the HUD-VASH	
	vouchers in the Greater Los	
	Angeles area.	
S	Mr. VanNatter is the Director of	1.5 hours
	Section 8 Housing at HACLA. Mr.	
	VanNatter is expected to testify	
	about Federal Defendants'	
	partnership with local public	
	housing authorities relating to the	
	HUD-VASH program, including	
	but not limited to, the	
	implementation of the HUD-	
	VASH program, the voucher	
	referral process, the number of	
	veterans in the HUD-VASH	
	program, and the utilization or lack	
	thereof of the HUD-VASH	
	vouchers in the Greater Los	
	Angeles area.	
S	Ms. Yoshimaru is the Assistant	1 hour
	Head of School at Brentwood	
	School. She is expected to provide	
	testimony regarding Brentwood	
	School's use of its facility on the	
	WLAVA Campus and its violation	
	of the West Los Angeles Leasing	
	Act.	

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5	Anthony	Pl
6	DeFrancesco	
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Barbara Davis	Plaintiffs	Ms. Davis is an administrator for SafetyPark. She is expected to provide testimony regarding Safety Park's obligations under and violation of the West Los Angeles Leasing Act.	1 hour
Anthony DeFrancesco	Plaintiffs	Mr. DeFrancesco is the Chief Liaison and Executive Director for the UCLA Veterans Initiatives and Partnerships. Mr. DeFrancesco is expected to provide testimony regarding UCLA's use of its facilities on the WLAVA Campus, the UC Regents' obligations under the West Los Angeles Leasing Act, and UCLA and the UC Regents' violation of the West Los Angeles Leasing Act.	1.5 hours

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