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8 Attorneys for Defendants as Persons  
Interested in the Matter:  
9 Southern California Association of  
Non-Profit Housing, Inc.  
10 Korean Immigrant Workers  
Advocates of Southern California  
11 DBA Koreatown Immigrant Workers  
Alliance  
12 Service Employees International  
Union Local 2015

13 UNITED STATES DISTRICT COURT  
14 CENTRAL DISTRICT OF CALIFORNIA

15 NEWCASTLE COURTYARDS, LLC, a  
16 California limited liability company;  
JONATHAN BENABOU, as Trustee on  
17 behalf of THE MANI BENABOU  
FAMILY TRUST; and ROES 1 through  
18 500,

19 Plaintiffs,

20 vs.

21 CITY OF LOS ANGELES; COUNTY OF  
LOS ANGELES; COUNTY OF LOS  
22 ANGELES RECORDER'S OFFICE; DOES  
1 through 500, and ALL PERSONS  
23 INTERESTED IN THE MATTER of the  
ULA,

24 Defendants.  
25

Case No.: 23-CV-00104-JAK-AS  
ANSWER OF SOUTHERN  
CALIFORNIA ASSOCIATION OF  
NON-PROFIT HOUSING, INC.,  
KOREAN IMMIGRANT  
WORKERS ADVOCATES OF  
SOUTHERN CALIFORNIA DBA  
KOREATOWN IMMIGRANT  
WORKERS ALLIANCE, and  
SERVICE EMPLOYEES  
INTERNATIONAL UNION  
LOCAL 2015 to PLAINTIFFS'  
FIRST AMENDED VERIFIED  
PETITION AND COMPLAINT

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**ANSWER**

This answer is respectfully filed on behalf of the following Defendants (“Defendants”), all of whom are Persons Interested in the Matter of Measure ULA because they were part of the original coalition backing the measure:

- a. Defendant Southern California Association of Non-Profit Housing, Inc. (“SCANPH”), is an association of non-profit housing developers dedicated to building and facilitating below market-rate homes for low income community members in Southern California. SCANPH was part of the original coalition backing Measure ULA because the measure promoted their aim of solving the affordable housing and homelessness crisis.
- b. Defendant Korean Immigrant Workers Advocates of Southern California (DBA Koreatown Immigrant Workers Alliance) (“KIWA”) is a non-profit organization dedicated to workers’ and renters’ rights and affordable housing. KIWA was part of the original coalition backing Measure ULA because the measure shared their focus on tenants’ and housing rights.
- c. Defendant Service Employees International Union Local 2015 (“SEIU”) is a worker organization devoted to obtaining livable wages and retirement security for California’s long-term care workers. Because SEIU also works to obtain housing for seniors, they joined the original coalition backing Measure ULA.

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**JURISDICTION AND VENUE**

1. Defendants admit that Plaintiffs purport to bring this action for their stated purpose. The remaining allegations set forth in Paragraph 1 constitute conclusions of law to which no response is required. To the extent a response is required, Defendants deny the remaining allegations in Paragraph 1.

2. The allegations set forth in Paragraph 2 constitute conclusions of law to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 2.

3. The allegations set forth in Paragraph 3 constitute conclusions of law to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 3.

4. The allegations in Paragraph 4 constitute conclusions of law to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 4.

5. The allegations set forth in Paragraph 5 constitute conclusions of law to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 5.

**INTRODUCTION AND PARTIES**

6. The allegations set forth in Paragraph 6 constitute conclusions of law to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 6.

7. Defendants lack information or belief sufficient to answer the allegations in Paragraph 7. To the extent a response is required, Defendants deny the allegations in Paragraph 7.

8. Defendants admit that Defendants All Persons Interested (SCANPH, KIWA, and SEUI), and Defendant City of Los Angeles is interested in the validity of Measure ULA. Defendants lack information or belief sufficient to answer the

1 remaining allegations in Paragraph 8. Except as expressly admitted, Defendants  
2 deny the allegations in Paragraph 8.

3 9. Defendants admit, on information and belief, that the City of Los  
4 Angeles is a charter city of the State of California, organized and operating under  
5 the Charter of the City of Los Angeles. Defendants lack information or belief  
6 sufficient to answer the remaining allegations in Paragraph 9. To the extent a  
7 response is required, and except as expressly admitted, Defendants deny the  
8 allegations in Paragraph 9.

9 10. Defendants admit that the County of Los Angeles is a county within the  
10 State of California. Defendants lack information or belief sufficient to answer the  
11 remaining allegations in Paragraph 10. To the extent a response is required,  
12 Defendants deny the allegations in Paragraph 10.

13 11. Defendants admit that the County of Los Angeles is a county within the  
14 State of California. Defendants lack information or belief sufficient to answer the  
15 remaining allegations in Paragraph 11. To the extent a response is required,  
16 Defendants deny the allegations in Paragraph 11.

17 12. Defendants lack information or belief sufficient to answer the  
18 allegations in Paragraph 12. To the extent a response is required, Defendants deny  
19 the allegations in Paragraph 12.

20 13. The allegations set forth in Paragraph 13 constitute conclusions of law  
21 to which no response is required. To the extent a response is required, Defendants  
22 deny the allegations in Paragraph 13.

23 14. Defendants lack information or belief sufficient to answer the  
24 allegations in Paragraph 14. To the extent a response is required, Defendants deny  
25 the allegations in Paragraph 14.

26 15. Defendants lack information or belief sufficient to answer the  
27 allegations in Paragraph 15. To the extent a response is required, Defendants deny  
28 the allegations in Paragraph 15.

**GENERAL ALLEGATIONS**

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16. Defendants admit that Measure ULA was passed by voter initiative pursuant to the November 8, 2022, general election in Los Angeles, and that, upon information and belief, a true copy of the Voter Information Pamphlet is attached to the Complaint as Exhibit A, containing the text of the Measure. The remaining allegations set forth in Paragraph 16 characterize the contents of public records, which speak for themselves, and are conclusions of law to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 16.

17. The allegations set forth in Paragraph 17 constitute conclusions of law to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 17.

18. The allegations set forth in Paragraph 18 characterize the contents of public records, which speak for themselves, and are legal contentions for which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 18.

19. The allegations set forth in Paragraph 19 constitute conclusions of law to which no conclusion is required. To the extent a response is required, the Defendants deny the allegations in Paragraph 19.

20. The allegations set forth in Paragraph 20 constitute conclusions of law to which no conclusion is required. To the extent a response is required, the Defendants deny the allegations in Paragraph 20.

21. The allegations set forth in Paragraph 21 constitute conclusions of law to which no response is required. To the extent a response is required, the Defendants deny the allegations in Paragraph 21.

22. The allegations set forth in Paragraph 22 characterize the contents of public records, which speak for themselves, and are legal contentions for which no

1 response is required. To the extent a response is required, Defendants deny the  
2 allegations in Paragraph 22.

3 23. The allegations set forth in Paragraph 23 constitute conclusions of law  
4 to which no response is required. To the extent a response is required, Defendants  
5 deny the allegations in Paragraph 23.

6 24. The allegations set forth in Paragraph 24 characterize the contents of  
7 public records, which speak for themselves, and are legal contentions for which no  
8 response is required. To the extent a response is required, Defendants deny the  
9 allegations in Paragraph 24.

10 25. The allegations set forth in Paragraph 25 characterize the contents of  
11 public records, which speak for themselves, and are legal contentions for which no  
12 response is required. To the extent a response is required, Defendants deny the  
13 allegations in Paragraph 25.

14 26. Defendants lack information or belief sufficient to answer the  
15 allegations in Paragraph 26. To the extent a response is required, Defendants admit  
16 that “homelessness does not just exist” in the City of Los Angeles. Except as  
17 expressly stated, Defendants deny the allegations in Paragraph 26.

18 27. Defendants lack information or belief sufficient to answer the  
19 allegations in Paragraph 27. To the extent a response is required, Defendants deny  
20 the allegations in Paragraph 27.

21 28. Defendants lack information or belief sufficient to answer the  
22 allegations in Paragraph 28. To the extent a response is required, Defendants deny  
23 the allegations in Paragraph 28.

24 29. Defendants lack information or belief sufficient to answer the  
25 allegations in Paragraph 29. To the extent a response is required, Defendants deny  
26 the allegations in Paragraph 29.

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1           30. Defendants lack information or belief sufficient to answer the  
2 allegations in Paragraph 30. To the extent a response is required, Defendants deny  
3 the allegations in Paragraph 30.

4           31. Defendants lack information or belief sufficient to answer the  
5 allegations in Paragraph 31. To the extent a response is required, Defendants deny  
6 the allegations in Paragraph 31.

7           32. Defendants lack information or belief sufficient to answer the  
8 allegations in Paragraph 32. To the extent a response is required, Defendants deny  
9 the allegations in Paragraph 32.

10          33. Defendants lack information or belief sufficient to answer the  
11 allegations in Paragraph 33. To the extent a response is required, Defendants deny  
12 the allegations in Paragraph 33.

13          34. Defendants lack information or belief sufficient to answer the  
14 allegations in Paragraph 34. To the extent a response is required, Defendants deny  
15 the allegations in Paragraph 34.

16          35. Defendants lack information or belief sufficient to answer the  
17 allegations in Paragraph 35. To the extent a response is required, Defendants deny  
18 the allegations in Paragraph 35.

19          36. Defendants admit that Exhibit B is an article published on February 26,  
20 2022. Defendants lack information or belief sufficient to answer the remaining  
21 allegations in Paragraph 36. To the extent a response is required, Defendants deny  
22 the allegations in Paragraph 36.

23          37. Defendants lack information or belief sufficient to answer the  
24 allegations in Paragraph 37. To the extent a response is required, Defendants deny  
25 the allegations in Paragraph 37.

26          38. Defendants lack information or belief sufficient to answer the  
27 allegations in Paragraph 38. To the extent a response is required, Defendants deny  
28 the allegations in Paragraph 38.

1 39. Defendants deny the allegations in Paragraph 39.

2 40. Defendants lack information or belief sufficient to answer the  
3 allegations in Paragraph 40. To the extent a response is required, Defendants deny  
4 the allegations in Paragraph 40.

5 41. Defendants lack information or belief sufficient to answer the  
6 allegations in Paragraph 41. To the extent a response is required, Defendants deny  
7 the allegations in Paragraph 41.

8 42. Defendants lack information or belief sufficient to answer the  
9 allegations in Paragraph 42. To the extent a response is required, Defendants deny  
10 the allegations in Paragraph 42.

11 43. Defendants lack information or belief sufficient to answer the  
12 allegations in Paragraph 43. To the extent a response is required, Defendants deny  
13 the allegations in Paragraph 43.

14 44. Defendants lack information or belief sufficient to answer the  
15 allegations in Paragraph 44. To the extent a response is required, Defendants deny  
16 the allegations in Paragraph 44.

17 45. Defendants lack information or belief sufficient to answer the  
18 allegations in Paragraph 45. To the extent a response is required, Defendants deny  
19 the allegations in Paragraph 45.

20 46. Defendants lack information or belief sufficient to answer the  
21 allegations in Paragraph 46. The allegations set forth in Paragraph 46 also constitute  
22 conclusion of law to which no response is required. To the extent a response is  
23 required, Defendants deny the allegations in Paragraph 46.

24 47. The allegations set forth in Paragraph 47 constitute conclusions of law  
25 to which no response is required. To the extent a response is required, Defendants  
26 deny the allegations in Paragraph 47.

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1           48. The allegations set forth in Paragraph 48 constitute conclusions of law  
2 to which no response is required. To the extent a response is required, Defendants  
3 deny the allegations in Paragraph 48.

4           49. The allegations set forth in Paragraph 49 constitute conclusions of law  
5 to which no response is required. To the extent a response is required, Defendants  
6 deny the allegations in Paragraph 49.

7           50. The allegations set forth in Paragraph 50 characterize the contents of  
8 public records, which speak for themselves, and are legal contentions for which no  
9 response is required. To the extent a response is required, Defendants deny the  
10 allegations in Paragraph 50.

11           51. The allegations set forth in Paragraph 51 characterize the contents of  
12 public records, which speak for themselves, and are legal contentions for which no  
13 response is required. To the extent a response is required, Defendants deny the  
14 allegations in Paragraph 51.

15           52. The allegations set forth in Paragraph 52 characterize the contents of  
16 public records, which speak for themselves, and are legal contentions for which no  
17 response is required. To the extent a response is required, Defendants deny the  
18 allegations in Paragraph 52.

19           53. Defendants lack information or belief sufficient to answer the  
20 allegations in Paragraph 53. To the extent a response is required, Defendants deny  
21 the allegations in Paragraph 53.

22           54. The allegations set forth in Paragraph 54 characterize the contents of  
23 public records, which speak for themselves, and are legal contentions for which no  
24 response is required. To the extent a response is required, Defendants deny the  
25 allegations in Paragraph 54.

26           55. Defendants lack information or belief sufficient to answer the  
27 allegations in Paragraph 55. To the extent a response is required, Defendants deny  
28 the allegations in Paragraph 55.

1           56. Defendants lack information or belief sufficient to answer the  
2 allegations in Paragraph 56. The allegations set forth in Paragraph 56 also constitute  
3 conclusions of law to which no response is required. To the extent a response is  
4 required, Defendants deny the allegations in Paragraph 56.

5           57. The allegations set forth in Paragraph 57 constitute conclusions of law  
6 to which no response is required. To the extent a response is required, Defendants  
7 deny the allegations in Paragraph 57.

8           58. The allegations set forth in Paragraph 58 constitute conclusions of law  
9 to which no response is required. To the extent a response is required, Defendants  
10 deny the allegations in Paragraph 58.

11           59. Defendants lack information or belief sufficient to answer the  
12 allegations in Paragraph 59. The allegations set forth in Paragraph 59 also constitute  
13 conclusions of law to which no response is required. To the extent a response is  
14 required, Defendants deny the allegations in Paragraph 59.

15           60. Defendants lack information or belief sufficient to answer the  
16 allegations in Paragraph 60. To the extent a response is required, Defendants deny  
17 the allegations in Paragraph 60.

18           61. Defendants lack information or belief sufficient to answer the  
19 allegations in Paragraph 61. To the extent a response is required, Defendants deny  
20 the allegations in Paragraph 61.

21           62. Defendants lack information or belief sufficient to answer the  
22 allegations in Paragraph 62. To the extent a response is required, Defendants deny  
23 the allegations in Paragraph 62.

24           63. The allegations set forth in Paragraph 63 characterize the contents of  
25 public records, which speak for themselves, and are legal contentions for which no  
26 response is required. To the extent a response is required, Defendants deny the  
27 allegations in Paragraph 63.

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1           73. The allegations set forth in Paragraph 73 constitute conclusions of law  
2 to which no response is required. To the extent a response is required, Defendants  
3 deny the allegations in Paragraph 73.

4           74. Defendants lack information or belief sufficient to answer the  
5 allegations in Paragraph 74. The allegations set forth in Paragraph 74 also constitute  
6 conclusions of law to which no response is required. To the extent a response is  
7 required, Defendants deny the allegations in Paragraph 74.

8           75. The allegations set forth in Paragraph 75 constitute conclusions of law  
9 to which no response is required. To the extent a response is required, Defendants  
10 deny the allegations in Paragraph 75.

11           76. The allegations set forth in Paragraph 76 constitute conclusions of law  
12 to which no response is required. To the extent a response is required, Defendants  
13 deny the allegations in Paragraph 76.

14           77. The allegations set forth in Paragraph 77 constitute conclusions of law  
15 to which no response is required. To the extent a response is required, Defendants  
16 deny the allegations in Paragraph 77.

17           78. The allegations set forth in Paragraph 78 constitute conclusions of law  
18 to which no response is required. To the extent a response is required, Defendants  
19 deny the allegations in Paragraph 78.

20           79. The allegations set forth in Paragraph 79 constitute conclusions of law  
21 to which no response is required. To the extent a response is required, Defendants  
22 deny the allegations in Paragraph 79.

23           80. The allegations set forth in Paragraph 80 constitute conclusions of law  
24 to which no response is required. To the extent a response is required, Defendants  
25 deny the allegations in Paragraph 80.

26           81. The allegations set forth in Paragraph 81 constitute conclusions of law  
27 to which no response is required. To the extent a response is required, Defendants  
28 deny the allegations in Paragraph 81.

1           82. The allegations set forth in Paragraph 82 constitute conclusions of law  
2 to which no response is required. To the extent a response is required, Defendants  
3 deny the allegations in Paragraph 82.

4           83. The allegations set forth in Paragraph 83 constitute conclusions of law  
5 to which no response is required. To the extent a response is required, Defendants  
6 deny the allegations in Paragraph 83.

7           84. The allegations set forth in Paragraph 84 constitute conclusions of law  
8 to which no response is required. To the extent a response is required, Defendants  
9 deny the allegations in Paragraph 84.

10          85. The allegations set forth in Paragraph 85 constitute conclusions of law  
11 to which no response is required. To the extent a response is required, Defendants  
12 deny the allegations in Paragraph 85.

13          86. The allegations set forth in Paragraph 86 constitute conclusions of law  
14 to which no response is required. To the extent a response is required, Defendants  
15 deny the allegations in Paragraph 86.

16          87. Defendants lack information or belief sufficient to answer the  
17 allegations in Paragraph 87. To the extent a response is required, Defendants deny  
18 the allegations in Paragraph 87.

19          88. The allegations set forth in Paragraph 88 constitute conclusions of law  
20 to which no response is required. To the extent a response is required, Defendants  
21 deny the allegations in Paragraph 88.

22          89. Defendants lack information or belief sufficient to answer the  
23 allegations in Paragraph 89. To the extent a response is required, Defendants deny  
24 the allegations in Paragraph 89.

25          90. Defendants lack information or belief sufficient to answer the  
26 allegations in Paragraph 90. To the extent a response is required, Defendants deny  
27 the allegations in Paragraph 90.

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1 91. The allegations set forth in Paragraph 91 constitute conclusions of law  
2 to which no response is required. To the extent a response is required, Defendants  
3 deny the allegations in Paragraph 91.

4 92. The allegations set forth in Paragraph 92 constitute conclusions of law  
5 to which no response is required. To the extent a response is required, Defendants  
6 deny the allegations in Paragraph 92.

7 93. The allegations set forth in Paragraph 93 constitute conclusions of law  
8 to which no response is required. To the extent a response is required, Defendants  
9 deny the allegations in Paragraph 93.

10 **SECOND CLAIM FOR RELIEF**

11 **(Violation of Equal Protection)**

12 94. Defendants incorporate by reference their responses to the preceding  
13 paragraphs as if set forth fully herein.

14 95. The allegations set forth in Paragraph 95 constitute conclusions of law  
15 to which no response is required. To the extent a response is required, Defendants  
16 deny the allegations in Paragraph 95.

17 96. The allegations set forth in Paragraph 96 constitute conclusions of law  
18 to which no response is required. To the extent a response is required, Defendants  
19 deny the allegations in Paragraph 96.

20 97. The allegations set forth in Paragraph 97 constitute conclusions of law  
21 to which no response is required. To the extent a response is required, Defendants  
22 deny the allegations in Paragraph 97.

23 98. The allegations set forth in Paragraph 98 constitute conclusions of law  
24 to which no response is required. To the extent a response is required, Defendants  
25 deny the allegations in Paragraph 98.

26 99. The allegations set forth in Paragraph 99 constitute conclusions of law  
27 to which no response is required. To the extent a response is required, Defendants  
28 deny the allegations in Paragraph 99.



1 109. The allegations set forth in Paragraph 109 characterize the contents of  
2 public records, which speak for themselves, and are legal contentions for which no  
3 response is required. To the extent a response is required, Defendants deny the  
4 allegations in Paragraph 109.

5 110. Defendants lack information or belief sufficient to answer the  
6 allegations in Paragraph 110. To the extent a response is required, Defendants deny  
7 the allegations in Paragraph 110.

8 111. Defendants lack information or belief sufficient to answer the  
9 allegations in Paragraph 111. The allegations set forth in Paragraph 111 also  
10 constitute conclusions of law to which no response is required. To the extent a  
11 response is required, Defendants deny the allegations in Paragraph 111.

12 112. Defendants lack information or belief sufficient to answer the  
13 allegations in Paragraph 112. To the extent a response is required, Defendants deny  
14 the allegations in Paragraph 112.

15 113. Defendants lack information or belief sufficient to answer the  
16 allegations in Paragraph 113. To the extent a response is required, Defendants deny  
17 the allegations in Paragraph 113.

18 114. The allegations set forth in Paragraph 114 constitute conclusions of law  
19 to which no response is required. To the extent a response is required, Defendants  
20 deny the allegations in Paragraph 114.

21 115. Defendants lack information or belief sufficient to answer the  
22 allegations in Paragraph 115. To the extent a response is required, Defendants deny  
23 the allegations in Paragraph 115.

24 116. Defendants lack information or belief sufficient to answer the  
25 allegations in Paragraph 116. To the extent a response is required, Defendants deny  
26 the allegations in Paragraph 116.

27 117. Defendants lack information or belief sufficient to answer the  
28 allegations regarding “long-term loans.” To the extent a response is required,

1 Defendants deny the allegations regarding “long-term loans.” The remaining  
2 allegations set forth in Paragraph 117 constitute questions of law to which no  
3 response is required. To the extent a response is required, Defendants deny the  
4 allegations in Paragraph 117.

5 118. Defendants lack information or belief sufficient to answer the  
6 allegations in Paragraph 118. To the extent a response is required, Defendants deny  
7 the allegations in Paragraph 118

8 119. Defendants lack information or belief sufficient to answer the  
9 allegations in Paragraph 119. To the extent a response is required, Defendants deny  
10 the allegations in Paragraph 119.

11 120. Defendants lack information or belief sufficient to answer the  
12 allegations in Paragraph 120. The allegations set forth in Paragraph 120 also  
13 constitute conclusions of law to which no response is required. To the extent a  
14 response is required, Defendants deny the allegations in Paragraph 120.

15 121. The allegations set forth in Paragraph 121 constitute conclusions of law  
16 to which no response is required. To the extent a response is required, Defendants  
17 deny the allegations in Paragraph 121.

18 122. The allegations set forth in Paragraph 122 constitute conclusions of law  
19 to which no response is required. To the extent a response is required, Defendants  
20 deny the allegations in Paragraph 122.

21 **FOURTH CLAIM FOR RELIEF**

22 **(Violation of Article XIII A, Section 4, of California Constitution)**

23 123. Defendants incorporate by reference their responses to the preceding  
24 paragraphs as if set forth fully herein.

25 124. The allegations set forth in Paragraph 124 constitute conclusions of law  
26 to which no response is required. To the extent a response is required, Defendants  
27 deny the allegations in Paragraph 124.

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1           125. The allegations set forth in Paragraph 125 constitute conclusions of law  
2 to which no response is required. To the extent a response is required, Defendants  
3 deny the allegations in Paragraph 125.

4           126. The allegations set forth in Paragraph 126 constitute conclusions of law  
5 to which no response is required. To the extent a response is required, Defendants  
6 deny the allegations in Paragraph 126.

7           127. The allegations set forth in Paragraph 127 constitute conclusions of law  
8 to which no response is required. To the extent a response is required, Defendants  
9 deny the allegations in Paragraph 127.

10           128. The allegations set forth in Paragraph 128 constitute conclusions of law  
11 to which no response is required. To the extent a response is required, Defendants  
12 deny the allegations in Paragraph 128.

13           129. The allegations set forth in Paragraph 129 constitute conclusions of law  
14 to which no response is required. To the extent a response is required, Defendants  
15 deny the allegations in Paragraph 129.

16           130. The allegations set forth in Paragraph 130 constitute conclusions of law  
17 to which no response is required. To the extent a response is required, Defendants  
18 deny the allegations in Paragraph 130.

19           131. Defendants deny the allegations in Paragraph 131.

20           132. The allegations set forth in Paragraph 132 constitute conclusions of law  
21 to which no response is required. To the extent a response is required, Defendants  
22 deny the allegations in Paragraph 132.

23           133. The allegations set forth in Paragraph 133 characterize the contents of  
24 public records, which speak for themselves, and are legal contentions for which no  
25 response is required. To the extent a response is required, Defendants deny the  
26 allegations in Paragraph 133.

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1           134. The allegations set forth in Paragraph 134 constitute conclusions of law  
2 to which no response is required. To the extent a response is required, Defendants  
3 deny the allegations in Paragraph 134.

4           135. The allegations set forth in Paragraph 135 constitute conclusions of law  
5 to which no response is required. To the extent a response is required, Defendants  
6 deny the allegations in Paragraph 135.

7           136. The allegations set forth in Paragraph 136 constitute conclusions of law  
8 to which no response is required. To the extent a response is required, Defendants  
9 deny the allegations in Paragraph 136.

10           137. The allegations set forth in Paragraph 137 constitute conclusions of law  
11 to which no response is required. To the extent a response is required, Defendants  
12 deny the allegations in Paragraph 137.

13           138. The allegations set forth in Paragraph 138 constitute conclusions of law  
14 to which no response is required. To the extent a response is required, Defendants  
15 deny the allegations in Paragraph 138.

16           139. The allegations set forth in Paragraph 139 constitute conclusions of law  
17 to which no response is required. To the extent a response is required, Defendants  
18 deny the allegations in Paragraph 139.

19           140. The allegations set forth in Paragraph 140 constitute conclusions of law  
20 to which no response is required. To the extent a response is required, Defendants  
21 deny the allegations in Paragraph 140.

22           141. The allegations set forth in Paragraph 141 constitute conclusions of law  
23 to which no response is required. To the extent a response is required, Defendants  
24 deny the allegations in Paragraph 141.

25           142. The allegations set forth in Paragraph 142 constitute conclusions of law  
26 to which no response is required. To the extent a response is required, Defendants  
27 deny the allegations in Paragraph 142.

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1           143. The allegations set forth in Paragraph 143 constitute conclusions of law  
2 to which no response is required. To the extent a response is required, Defendants  
3 deny the allegations in Paragraph 143.

4           144. The allegations set forth in Paragraph 144 constitute conclusions of law  
5 to which no response is required. To the extent a response is required, Defendants  
6 deny the allegations in Paragraph 144.

7           145. The allegations set forth in Paragraph 145 constitute conclusions of law  
8 to which no response is required. To the extent a response is required, Defendants  
9 deny the allegations in Paragraph 145.

10          146. The allegations set forth in Paragraph 146 constitute conclusions of law  
11 to which no response is required. To the extent a response is required, Defendants  
12 deny the allegations in Paragraph 146.

13          147. The allegations set forth in Paragraph 147 constitute conclusions of law  
14 to which no response is required. To the extent a response is required, Defendants  
15 deny the allegations in Paragraph 147.

16          148. The allegations set forth in Paragraph 148 constitute conclusions of law  
17 to which no response is required. To the extent a response is required, Defendants  
18 deny the allegations in Paragraph 148.

19          149. The allegations set forth in Paragraph 149 constitute conclusions of law  
20 to which no response is required. To the extent a response is required, Defendants  
21 deny the allegations in Paragraph 149.

22          150. The allegations set forth in Paragraph 150 constitute conclusions of law  
23 to which no response is required. To the extent a response is required, Defendants  
24 deny the allegations in Paragraph 150.

25          151. The allegations set forth in Paragraph 151 constitute conclusions of law  
26 to which no response is required. To the extent a response is required, Defendants  
27 deny the allegations in Paragraph 151.

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1 152. Defendants lack information or belief sufficient to answer the  
2 allegations set forth in Paragraph 152. The allegations set forth in Paragraph 152  
3 also constitute conclusions of law to which no response is required. To the extent a  
4 response is required, Defendants deny the allegations in Paragraph 152.

5 153. The allegations set forth in Paragraph 153 constitute conclusions of law  
6 to which no response is required. To the extent a response is required, Defendants  
7 deny the allegations in Paragraph 153.

8 **FIFTH CLAIM FOR RELIEF**

9 **(Violation of *California Government Code Section 53725*)**

10 154. Defendants incorporate by reference their responses to the preceding  
11 paragraphs as if set forth fully herein.

12 155. The allegations set forth in Paragraph 155 constitute conclusions of law  
13 to which no response is required. To the extent a response is required, Defendants  
14 deny the allegations in Paragraph 155.

15 156. The allegations set forth in Paragraph 156 constitute conclusions of law  
16 to which no response is required. To the extent a response is required, Defendants  
17 deny the allegations in Paragraph 156.

18 157. The allegations set forth in Paragraph 157 constitute conclusions of law  
19 to which no response is required. To the extent a response is required, Defendants  
20 deny the allegations in Paragraph 157.

21 158. The allegations set forth in Paragraph 158 constitute conclusions of law  
22 to which no response is required. To the extent a response is required, Defendants  
23 deny the allegations in Paragraph 158.

24 159. The allegations set forth in Paragraph 159 characterize the contents of  
25 public records, which speak for themselves, and are legal contentions for which no  
26 response is required. To the extent a response is required, Defendants deny the  
27 allegations in Paragraph 159.

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1 160. The allegations set forth in Paragraph 160 constitute conclusions of law  
2 to which no response is required. To the extent a response is required, Defendants  
3 deny the allegations in Paragraph 160.

4 161. The allegations set forth in Paragraph 161 constitute conclusions of law  
5 to which no response is required. To the extent a response is required, Defendants  
6 deny the allegations in Paragraph 161.

7 **SIXTH CLAIM FOR RELIEF**

8 **(Government Taking Without Compensation)**

9 162. Defendants incorporate by reference their responses to the preceding  
10 paragraphs as if set forth fully herein.

11 163. The allegations set forth in Paragraph 163 constitute conclusions of law  
12 to which no response is required. To the extent a response is required, Defendants  
13 deny the allegations in Paragraph 163.

14 164. The allegations set forth in Paragraph 164 constitute conclusions of law  
15 to which no response is required. To the extent a response is required, Defendants  
16 deny the allegations in Paragraph 164.

17 165. The allegations set forth in Paragraph 165 characterize the contents of  
18 public records, which speak for themselves, and are legal contentions for which no  
19 response is required. To the extent a response is required, Defendants deny the  
20 allegations in Paragraph 165.

21 166. The allegations set forth in Paragraph 166 characterize the contents of  
22 public records, which speak for themselves, and are legal contentions for which no  
23 response is required. To the extent a response is required, Defendants deny the  
24 allegations in Paragraph 166.

25 167. The allegations set forth in Paragraph 167 characterize the contents of  
26 public records, which speak for themselves, and are legal contentions for which no  
27 response is required. To the extent a response is required, Defendants deny the  
28 allegations in Paragraph 167.

1 168. Defendants lack information or belief sufficient to answer the  
2 allegations in Paragraph 168. To the extent a response is required, Defendants deny  
3 the allegations in Paragraph 168.

4 169. Defendants lack information or belief sufficient to answer the  
5 allegations in Paragraph 169. To the extent a response is required, Defendants deny  
6 the allegations in Paragraph 169.

7 170. The allegations set forth in Paragraph 170 characterize the contents of  
8 public records, which speak for themselves, and are legal contentions for which no  
9 response is required. To the extent a response is required, Defendants deny the  
10 allegations in Paragraph 170.

11 171. Defendants deny the allegations in Paragraph 171.

12 172. Defendants lack information or belief sufficient to answer the  
13 allegations in Paragraph 172. To the extent a response is required, Defendants deny  
14 the allegations in Paragraph 172.

15 173. The allegations set forth in Paragraph 173 characterize the contents of  
16 public records, which speak for themselves, and are legal contentions for which no  
17 response is required. To the extent a response is required, Defendants deny the  
18 allegations in Paragraph 173.

19 174. The allegations set forth in Paragraph 174 characterize the contents of  
20 public records, which speak for themselves, and are legal contentions for which no  
21 response is required. To the extent a response is required, Defendants deny the  
22 allegations in Paragraph 174.

23 175. The allegations set forth in Paragraph 175 constitute conclusions of law  
24 to which no response is required. To the extent a response is required, Defendants  
25 deny the allegations in Paragraph 175.

26 176. The allegations set forth in Paragraph 176 constitute conclusions of law  
27 to which no response is required. To the extent a response is required, Defendants  
28 deny the allegations in Paragraph 176.

1 177. The allegations set forth in Paragraph 177 constitute conclusions of law  
2 to which no response is required. To the extent a response is required, Defendants  
3 deny the allegations in Paragraph 177.

4 178. The allegations set forth in Paragraph 178 constitute conclusions of law  
5 to which no response is required. To the extent a response is required, Defendants  
6 deny the allegations in Paragraph 178.

7 179. The allegations set forth in Paragraph 179 characterize the contents of  
8 public records, which speak for themselves, and are legal contentions for which no  
9 response is required. To the extent a response is required, Defendants deny the  
10 allegations in Paragraph 179.

11 180. The allegations set forth in Paragraph 180 constitute conclusions of law  
12 to which no response is required. To the extent a response is required, Defendants  
13 deny the allegations in Paragraph 180.

14 181. The allegations set forth in Paragraph 181 constitute conclusions of law  
15 to which no response is required. To the extent a response is required, Defendants  
16 deny the allegations in Paragraph 181.

17 182. The allegations set forth in Paragraph 182 constitute conclusions of law  
18 to which no response is required. To the extent a response is required, Defendants  
19 deny the allegations in Paragraph 182.

20 183. The allegations set forth in Paragraph 183 constitute conclusions of law  
21 to which no response is required. To the extent a response is required, Defendants  
22 deny the allegations in Paragraph 183.

23 184. The allegations set forth in Paragraph 184 constitute conclusions of law  
24 to which no response is required. To the extent a response is required, Defendants  
25 deny the allegations in Paragraph 184.

26 185. The allegations set forth in Paragraph 185 constitute conclusions of law  
27 to which no response is required. To the extent a response is required, Defendants  
28 deny the allegations in Paragraph 185.

1 186. The allegations set forth in Paragraph 186 constitute conclusions of law  
2 to which no response is required. To the extent a response is required, Defendants  
3 deny the allegations in Paragraph 186.

4 187. The allegations set forth in Paragraph 187 constitute conclusions of law  
5 to which no response is required. To the extent a response is required, Defendants  
6 deny the allegations in Paragraph 187.

7 188. The allegations set forth in Paragraph 188 constitute conclusions of law  
8 to which no response is required. To the extent a response is required, Defendants  
9 deny the allegations in Paragraph 188.

10 189. The allegations set forth in Paragraph 189 constitute conclusions of law  
11 to which no response is required. To the extent a response is required, Defendants  
12 deny the allegations in Paragraph 189.

13 **SEVENTH CLAIM FOR RELIEF**

14 **(Governmental Taking Without Compensation)**

15 190. Defendants incorporate by reference their responses to the preceding  
16 paragraphs as if set forth fully herein.

17 191. The allegations set forth in Paragraph 191 constitute conclusions of law  
18 to which no response is required. To the extent a response is required, Defendants  
19 deny the allegations in Paragraph 191.

20 192. The allegations set forth in Paragraph 192 constitute conclusions of law  
21 to which no response is required. To the extent a response is required, Defendants  
22 deny the allegations in Paragraph 192.

23 193. The allegations set forth in Paragraph 193 constitute conclusions of law  
24 to which no response is required. To the extent a response is required, Defendants  
25 deny the allegations in Paragraph 193.

26 194. The allegations set forth in Paragraph 194 constitute conclusions of law  
27 to which no response is required. To the extent a response is required, Defendants  
28 deny the allegations in Paragraph 194.

1           195. The allegations set forth in Paragraph 195 constitute conclusions of law  
2 to which no response is required. To the extent a response is required, Defendants  
3 deny the allegations in Paragraph 195.

4           196. The allegations set forth in Paragraph 196 characterize the contents of  
5 public records, which speak for themselves, and are legal contentions for which no  
6 response is required. To the extent a response is required, Defendants deny the  
7 allegations in Paragraph 196.

8           197. The allegations set forth in Paragraph 197 characterize the contents of  
9 public records, which speak for themselves, and are legal contentions for which no  
10 response is required. To the extent a response is required, Defendants deny the  
11 allegations in Paragraph 197.

12           198. The allegations set forth in Paragraph 198 constitute conclusions of law  
13 to which no response is required. To the extent a response is required, Defendants  
14 deny the allegations in Paragraph 198.

15           199. The allegations set forth in Paragraph 199 constitute conclusions of law  
16 to which no response is required. To the extent a response is required, Defendants  
17 deny the allegations in Paragraph 199.

18           200. The allegations set forth in Paragraph 200 constitute conclusions of law  
19 to which no response is required. To the extent a response is required, Defendants  
20 deny the allegations in Paragraph 200.

21           201. The allegations set forth in Paragraph 201 characterize the contents of  
22 public records, which speak for themselves, and are legal contentions for which no  
23 response is required. To the extent a response is required, Defendants deny the  
24 allegations in Paragraph 201.

25           202. The allegations set forth in Paragraph 202 constitute conclusions of law  
26 to which no response is required. To the extent a response is required, Defendants  
27 deny the allegations in Paragraph 202.

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1 203. The allegations set forth in Paragraph 203 constitute conclusions of law  
2 to which no response is required. To the extent a response is required, Defendants  
3 deny the allegations in Paragraph 203.

4 **EIGHTH CLAIM FOR RELIEF**

5 **(Governmental Taking Without Compensation)**

6 204. Defendants incorporate by reference their responses to the preceding  
7 paragraphs as if set forth fully herein.

8 205. The allegations set forth in Paragraph 205 constitute conclusions of law  
9 to which no response is required. To the extent a response is required, Defendants  
10 deny the allegations in Paragraph 205.

11 206. The allegations set forth in Paragraph 206 constitute conclusions of law  
12 to which no response is required. To the extent a response is required, Defendants  
13 deny the allegations in Paragraph 206.

14 207. The allegations set forth in Paragraph 207 constitute conclusions of law  
15 to which no response is required. To the extent a response is required, Defendants  
16 deny the allegations in Paragraph 207.

17 208. The allegations set forth in Paragraph 208 constitute conclusions of law  
18 to which no response is required To the extent a response is required, Defendants  
19 deny the allegations in Paragraph 208.

20 209. The allegations set forth in Paragraph 209 constitute conclusions of law  
21 to which no response is required. To the extent a response is required, Defendants  
22 deny the allegations in Paragraph 209.

23 210. The allegations set forth in Paragraph 210 constitute conclusions of law  
24 to which no response is required. To the extent a response is required, Defendants  
25 deny the allegations in Paragraph 210.

26 211. The allegations set forth in Paragraph 211 constitute conclusions of law  
27 to which no response is required. To the extent a response is required, Defendants  
28 deny the allegations in Paragraph 211.





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**ELEVENTH CLAIM FOR RELIEF**

**(Unlawful Delegation of Authority)**

229. Defendants incorporate by reference their responses to the preceding paragraphs as if set forth fully herein.

230. The allegations set forth in Paragraph 230 constitute conclusions of law to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 230.

231. The allegations set forth in Paragraph 231 constitute conclusions of law to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 231.

232. The allegations set forth in Paragraph 232 constitute conclusions of law to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 232.

**TWELFTH CLAIM FOR RELIEF**

**(The ULA is Unconstitutionally Vague)**

233. Defendants incorporate by reference their responses to the preceding paragraphs as if set forth fully herein.

234. The allegations set forth in Paragraph 234 constitute conclusions of law to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 234.

235. The allegations set forth in Paragraph 235 constitute conclusions of law to which no response is required. To the extent a response is required, Defendants deny the allegations in Paragraph 235.

**THIRTEENTH CLAIM FOR RELIEF**

**(The ULA Violates the Commerce Clause)**

236. Defendants incorporate by reference their responses to the preceding paragraphs as if set forth fully herein.



1 245. Defendants lack information or belief sufficient to answer the  
2 allegations in Paragraph 245. To the extent a response is required, Defendants deny  
3 the allegations in Paragraph 245.

4 246. Defendants lack information or belief sufficient to answer the  
5 allegations in Paragraph 246. To the extent a response is required, Defendants deny  
6 the allegations in Paragraph 246.

7 **FIFTEENTH CLAIM FOR RELIEF**

8 **(Writ of Mandate)**

9 247. Defendants incorporate by reference their responses to the preceding  
10 paragraphs as if set forth fully herein.

11 248. Defendants deny the allegations in Paragraph 248.

12 249. Defendants deny the allegations in Paragraph 249.

13 250. Defendants deny the allegations in Paragraph 250.

14 251. Defendants deny the allegations in Paragraph 251.

15 252. The allegations set forth in Paragraph 252 constitute conclusions of law  
16 to which no response is required. To the extent a response is required, Defendants  
17 deny the allegations in Paragraph 252.

18 253. The allegations set forth in Paragraph 253 constitute conclusions of law  
19 to which no response is required. To the extent a response is required, Defendants  
20 deny the allegations in Paragraph 253.

21 254. The allegations set forth in Paragraph 254 constitute conclusions of law  
22 to which no response is required. To the extent a response is required, Defendants  
23 deny the allegations in Paragraph 254.

24 255. Defendants deny the allegations in Paragraph 255.

25 256. The allegations set forth in Paragraph 256 constitute conclusions of law  
26 to which no response is required. To the extent a response is required, Defendants  
27 deny the allegations in Paragraph 256.

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1           265. Defendants admit only that Plaintiffs purport to bring this action as a  
2 reverse validation action. The remaining allegations set forth in Paragraph 265  
3 constitute legal conclusions to which no response is required. Except as expressly  
4 stated, Defendants deny the allegations in Paragraph 265.

5           266. The allegations set forth in Paragraph 266 constitute conclusions of law  
6 to which no response is required. To the extent a response is required, Defendants  
7 deny the allegations in Paragraph 266.

8           267. The allegations set forth in Paragraph 267 constitute conclusions of law  
9 to which no response is required. To the extent a response is required, Defendants  
10 deny the allegations in Paragraph 267.

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1 **AFFIRMATIVE DEFENSES**

2 Defendants further plead the following separate and additional affirmative  
3 defenses. By pleading these defenses, Defendants do not in any way agree or  
4 concede that they have the burden of proof or persuasion on any of these issues.  
5 Defendants reserve the right to assert such additional defenses as emerging  
6 information indicates are proper.

7 **First Affirmative Defense**

8 **(Failure to State a Claim)**

9 Defendants allege that the Complaint fails to state facts sufficient to constitute  
10 a cause of action under applicable law.

11 **Second Affirmative Defense**

12 **(Ripeness)**

13 Defendants allege that the purported causes of action contained within the  
14 Complaint are not ripe.

15 **Third Affirmative Defense**

16 **(Lack of Standing)**

17 Defendants allege that Plaintiffs lacks standing to bring the purported causes  
18 of action contained within the Complaint

19 **Fourth Affirmative Defense**

20 **(Lack of Subject Matter Jurisdiction)**

21 Defendants allege that the court lacks subject matter jurisdiction over this  
22 action.

23 **Fifth Affirmative Defense**

24 **(Waiver and Estoppel)**

25 Defendants allege that the Complaint is barred by the doctrines of waiver  
26 and/or estoppel.

27 **Sixth Affirmative Defense**

28 **(Speculative Damages)**

1 To the extent Plaintiffs seek damages, Defendants allege that the Complaint is  
2 barred because the injuries and damages, if any, suffered by Plaintiffs are  
3 speculative, depend on the happening of events which are not reasonably certain to  
4 occur, may be mitigated by future events, and cannot be determined with the degree  
5 of certainty required by law.

6 **Seventh Affirmative Defense**

7 (Lack of Damages)

8 To the extent Plaintiffs seek damages, Defendants allege that the Complaint is  
9 barred because Plaintiffs have suffered no damages as a result of any act or omission  
10 of Defendants; therefore, Plaintiffs are barred from asserting any cause of action  
11 against Defendants.

12 **Eighth Affirmative Defense**

13 (Contrary to Public Policy)

14 Plaintiffs' actions constitute a violation of public policy and therefore prevent  
15 Plaintiffs from prevailing on its causes of action.

16 **Ninth Affirmative Defense**

17 (Compliance with Statutory Authorities)

18 The Complaint, and each purported cause of action therein, is barred, in  
19 whole or in part, as Defendants are not liable for any acts or omissions undertaken  
20 by or at the direction or sufferance of any local, state, or federal authority, including,  
21 without limitation, acts or omissions made in accordance with any initiative, permit,  
22 license, statute, law, or regulation applicable at the time the acts or omissions  
23 occurred.

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**PRAYER**

WHEREFORE, Defendants SCANPH, KIWA, and SEIU pray for judgment as follows:

1. That the Complaint be dismissed with prejudice;
2. That the Plaintiffs take nothing by reason of the Complaint or otherwise;
3. For attorney’s fees and costs; and
4. For such other and further relief as the Court may deem just.

Dated: March 9, 2023

Respectfully submitted,  
IRELL & MANELLA, LLP  
Morgan Chu  
Connor He-Schaefer

PUBLIC COUNSEL  
Gregory Bonett  
Faizah Malik  
Brandon Payette  
Kathryn Eidmann

By: /s/ Connor He-Schaefer  
Connor He-Schaefer  
Attorney for Defendants Southern  
California Association of Non-Profit  
Housing, Inc., Korean Immigrant  
Workers Advocates of Southern  
California DBA Koreatown Immigrant  
Workers Alliance, and Service  
Employees International Union Local  
2015

**VERIFICATION**

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I, Alan Greenlee, declare:

I am the Executive Director of the Southern California Association of Non-Profit Housing, Inc. (SCANPH), a party to this action. I have read the foregoing Answer and know its contents. I am authorized to make this verification for and on behalf of SCANPH and make this verification for that reason. The matters stated in the foregoing Answer are true to my knowledge, except as the matters which are therein state upon information and belief, and as to those matter I believe them to be true.

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

Executed at Los Angeles, California on March 9, 2023.

  
\_\_\_\_\_  
Alan Greenlee

**VERIFICATION**

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I, Alexandra Suh, declare:

I am the Executive Director of the Korean Immigrant Workers Advocates of Southern California (DBA Koreatown Immigrant Workers Alliance) (“KIWA”), a party to this action. I have read the foregoing Answer and know its contents. I am authorized to make this verification for and on behalf of KIWA and make this verification for that reason. The matters stated in the foregoing Answer are true to my knowledge, except as the matters which are therein state upon information and belief, and as to those matter I believe them to be true.

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

Executed at Los Angeles, California on March 8, 2023.



Alexandra Suh

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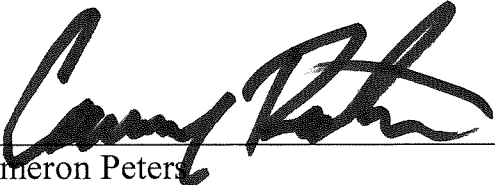
**VERIFICATION**

I, Cameron Peters, declare:

I am a Political Coordinator at Service Employees International Union Local 2015 (“SEIU”), a party to this action. I have read the foregoing Answer and know its contents. I am authorized to make this verification for and on behalf of SEIU and make this verification for that reason. The matters stated in the foregoing Answer are true to my knowledge, except as the matters which are therein state upon information and belief, and as to those matter I believe them to be true.

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

Executed at Los Angeles, California on March 9, 2023.

  
Cameron Peters

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**PROOF OF SERVICE**

I, Emily Grant, 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 1800 Avenue of the Stars, Suite 900, Los Angeles, California 90067-4276.

On March 9, 2023, I served the foregoing document described as **Answer Of Southern California Association Of Non-Profit Housing, Inc., Korean Immigrant Workers Advocates Of Southern California DBA Koreatown Immigrant Workers Alliance, And Service Employees International Union Local 2015 To Plaintiffs’ First Amended Verified Petition And Complaint** on each interested party, as stated in the attached service list.

(BY ELECTRONIC SERVICE) I caused the foregoing document to be sent to the persons at the electronic service addresses set forth in the attached service list via electronic filing.

Executed on March 9, 2023, at Los Angeles, California.

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

Emily Grant  
\_\_\_\_\_  
(Type or print name)

/s/ Emily Grant  
\_\_\_\_\_  
(Signature)

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**SERVICE LIST**

<b><u>Via Electronic Service</u></b>	<b><u>Via Electronic Service</u></b>
<p>Keith M. Fromm LAW OFFICES OF KEITH M. FROMM 907 Westwood Blvd., Suite 442 Los Angeles, CA 90024 Tel: (310) 500-9960 E-mail: <a href="mailto:keithfromm@aol.com">keithfromm@aol.com</a></p>	<p>Hydee Feldstein Soto Scott Marcus Valerie L. Flores Daniel Whitley Email: <a href="mailto:Daniel.Whitley@lacity.org">Daniel.Whitley@lacity.org</a> OFFICE OF THE CITY ATTORNEY 200 North Main Street, 920 City Hall East Los Angeles, CA 90012 Tel: 213.978.7786 Fax: 213.978.7711</p>
<p>Jeffrey Lee Costell Joshua S. Stambaugh Sara M. McDuffie COSTELL &amp; ADELSON LAW CORP. 100 Wilshire Blvd., Suite 700 Santa Monica, CA 90401 Tel: (310) 458-5959 E-mail: <a href="mailto:jlcostell@costell-law.com">jlcostell@costell-law.com</a>; <a href="mailto:jstambaugh@costell-law.com">jstambaugh@costell-law.com</a>; <a href="mailto:smcduffie@costell-law.com">smcduffie@costell-law.com</a></p>	<p>Kevin D. Siegel E-mail: <a href="mailto:ksiegel@bwslaw.com">ksiegel@bwslaw.com</a> J. Leah Castella E-mail: <a href="mailto:lcastella@bwslaw.com">lcastella@bwslaw.com</a> Tamar M. Burke E-mail: <a href="mailto:tburke@bwslaw.com">tburke@bwslaw.com</a> Eileen Ollivier E-mail: <a href="mailto:eollivier@bwslaw.com">eollivier@bwslaw.com</a> BURKE, WILLIAMS &amp; SORENSEN, LLP 1 California Street, Suite 3050 San Francisco, CA 94111-5432 Tel: 415.655.8100 Fax: 415.655.8099</p>
<p><i>Attorneys for Plaintiffs Newcastle Courtyards, LLC and Jonathan Benabou, as Trustee on behalf of The Mani Benabou Family Trust</i></p>	<p><i>Attorneys for Defendant, City of Los Angeles</i></p>