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25 UNITED STATES DISTRICT COURT
26 CENTRAL DISTRICT OF CALIFORNIA

27 LA ALLIANCE FOR HUMAN
28 RIGHTS, *et al.*,

Plaintiffs,

v.

CITY OF LOS ANGELES, *et al.*,

Defendants.

Case No. 2:20-CV-02291-DOC-KES

Assigned to Judge David O. Carter

JOINT WITNESS LIST

Before: Hon. David O. Carter
Courtroom: 10A

1 Plaintiff LA Alliance for Human Rights and Defendant City of Los Angeles,
2 files the following Witness List for the upcoming evidentiary hearing, set for
3 November 19, 2025. The parties do not necessarily intend to call all of the witnesses
4 listed below but reserve the right to question them if they are questioned by other
5 parties or the Court; the witness order below is also not necessarily the order in which
6 the witnesses will be called during the hearing. The parties also reserve the right to
7 call additional witnesses depending on the scope of the hearing and the issues raised.

8 Witnesses to be Presented:

- 9 1) Michele Martinez
10 2) Daniel Garrie¹
11 3) Bevin Kuhn²
12 4) Paul Webster
13 5) Daniel Conway³
14 6) Mercedes Marquez⁴
15 7) Matthew Szabo
16 8) Edwin Gipson
17 9) Gita O'Neill

18 Witnesses Unavailable:

- 19 1) Laura Frost⁵
20

21 ¹ Mr. Garrie is out of the country on business and indicated he would discuss
22 availability with the Court.

23 ² Available via Zoom due to in-person commitments out of state. Ms. Kuhn is
24 available to testify only Wednesday or Friday. She is available to testify in person
25 beginning December 1.

26 ³ Available via Zoom due to in-person commitments out of state. Mr. Conway is
27 available to testify in person on December 1 or 2.

28 ⁴ The Alliance represents that Mercedes Marquez was served with a subpoena
on November 16, 2025 to appear on November 19, 2025, at 9am. Proof of service may
be provided upon request.

⁵ The Alliance represents that Laura Frost and Diane Rafferty of Alvarez &
Marsal are out of state with a client in a rural area the entire week of November 17,

1 2) Diane Rafferty⁶

2 Witnesses Available if Needed For Cross-Examination:

3 1) Elizabeth Mitchell⁷

5 Dated: November 18, 2025

Respectfully submitted,

6 /s/ Elizabeth A. Mitchell

7 UMHOFFER, MITCHELL & KING, LLP

Matthew Donald Umhofer

8 Elizabeth A. Mitchell

9 *Attorneys for Plaintiffs*

10 Dated: November 18, 2025

Respectfully submitted,

11 /s/ Theane Evangelis

12 UMHOFFER, MITCHELL & KING, LLP

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25 2025 and unavailable, even remotely. Ms. Frost and Ms. Rafferty may be available to
26 testify in person beginning the week of November 24. The Alliance is prepared to
move forward without these witnesses.

27 ⁶ *Id.*

28 ⁷ Plaintiff relies on declaration of Elizabeth Mitchell submitted with Dkt. No.
1070 and exhibits attached thereto but will make Ms. Mitchell available for cross
examination as needed.

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ATTESTATION

All signatories listed above, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

Dated: November 18, 2025

Respectfully submitted,

/s/ Elizabeth A. Mitchell

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Elizabeth A. Mitchell

Attorneys for Plaintiffs