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CITY OF LOS ANGELES

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LA ALLIANCE FOR HUMAN RIGHTS,
et al.,

Plaintiffs,

v.

CITY OF LOS ANGELES, a Municipal
entity, et al.,

Defendants.

Case No. 2:20-cv-02291 DOC (KES)

Hon. David O. Carter
United States District Judge

**DEFENDANT CITY OF LOS
ANGELES' OBJECTIONS TO LA
ALLIANCE'S RESPONSE RE ISSUES
RAISED BY COURT ON MARCH 27,
2025 [DKT. 899] AND REQUEST FOR
APEX TESTIMONY [NO DKT.]**

Date: May 15, 2025
Time: 9:00 a.m.
Location: First Street Courthouse
Courtroom 1

**TO THE COURT AND TO ALL PARTIES AND THEIR ATTORNEYS OF
RECORD:**

Defendant City of Los Angeles (“City”) hereby files these preliminary objections to Plaintiff LA Alliance’s Response Re Issues Raised By Court On March 27, 2025 [Dkt. 899] (“Response”); to LA Alliance’s undocketed request for apex testimony sent to the Court on Friday, May 9, 2025; and to the matters raised in the Response (and any possible testimony) being heard and decided at the hearing now rescheduled for Tuesday, May 27, 2025 [Dkt. 900].

By making these preliminary objections, City does not waive, and expressly reserves, its rights, objections, and arguments with respect to the issues raised in the Motion, the Response, and any other matter at issue in these proceedings. City intends to file briefs addressing the assertions, arguments, and misstatements in the request for a receiver filed by LA Alliance, in accordance with a proper briefing schedule to be set by the Court. The untimely filing by LA Alliance precludes the City from making its substantive arguments here. Accordingly, these objections deal only with procedural and collateral issues

Plaintiff’s Response Regarding a Receivership is Improper

LA Alliance’s Response to the Court’s request for briefing on LA Alliance’s demand that a receiver be appointed was filed in violation of this Court’s Procedures and the Local Rules of the Central District of California, and a hearing and resolution of

1 those issues at the hearing originally scheduled on May 15, 2025, or as rescheduled to
2 May 27, 2025, will violate due process.

3 At the March 27, 2025 hearing, this Court requested LA Alliance brief its
4 improperly late-raised request that a receiver be appointed. Dkt. 878, pp. 78-80, 121.
5 However, LA Alliance did not file its brief on the receivership issue until late in the
6 evening of May 8, 2025, some six weeks later and less than 7 days before the hearing
7 scheduled for 9:00 am on May 15. See Declaration of Arlene Hoang (“Hoang Decl.”),
8 ¶ 2; Exhibit A to Hoang Decl. That the hearing has been rescheduled to May 27 does
9 not cure the procedural and due process infirmities in the pleadings, as follows:

- 10 ● LA Alliance did not raise the appointment of a receiver as a potential
11 remedy for its Motion for Order re Settlement Agreement Compliance [Dkt.
12 863] until its reply brief [Dkt. 872, p.4]. Not only is this contrary to the law
13 (*see, e.g., Smith v. Marsh*, 194 F.3d 1045, 1052 (9th Cir. 1999) (arguments
14 raised for the first time in a reply brief are deemed waived)), it has left City
15 without an opportunity to properly brief the issue or to sufficiently prepare
16 for a hearing on the issue, thus violating due process. *See, e.g., Application*
17 *of Gault*, 387 U.S. 1, 33 (1967) (“Notice, to comply with due process
18 requirements, must be given sufficiently in advance of scheduled court
19 proceedings so that reasonable opportunity to prepare will be afforded...”).
20 This is especially egregious here because LA Alliance did not provide any
21

1 legal or evidentiary basis in its reply brief for the drastic and severe request
2 for a receiver, which has only now been set forth in the Response.

- 3 ● LA Alliance's Response is essentially a new motion (albeit one requested
4 by the Court after LA Alliance floated the concept for the first time in its
5 reply brief) asking for the appointment of a receiver. Motions are required
6 to be filed 28 days before the hearing. LR 6-1.
- 7 ● This Court's Procedures states that "Memoranda of Points and Authorities
8 are subject to a 25-page limit; only in rare cases and for good cause shown
9 will the Court grant leave to exceed that page limitation." See
10 www.cacd.uscourts.gov/honorable-david-o-carter, #6. The Response is 39
11 pages, and LA Alliance did not seek, nor obtain, leave of court to exceed
12 the page limit. Similarly, the Local Rules require briefs to be no more than
13 7,000 words and for the moving party to submit a Certificate of
14 Compliance. LR 11-6.1, LR 11-6.2. LA Alliance violated both of these
15 rules as well.

16 **LA Alliance's Request for Apex Testimony is Improper**

17 LA Alliance's request that Mayor Karen Bass and other elected City officials
18 testify at the evidentiary hearing on its Motion similarly violates the law and several
19 local rules.

20 LA Alliance filed a Motion for Order re Settlement Agreement Compliance [[Dkt.](#)
21 [863](#)] and a Reply in support of that Motion [[Dkt. 872.](#)] LA Alliance was required, at

1 those times, to file any and all evidence in support of the motion in writing. LR 7-5, 7-6.
2 LA Alliance submitted declarations from counsel with exhibits attached thereto. Dkts.
3 863-1 through 863-10; 872-1, 872-2. That evidence, and those exhibits, did not include
4 a request for testimony from anyone.

5 Despite this lack of notice, LA Alliance sent an email to the Court on May 9 – less
6 than six calendar days before the original date for the hearing – requesting to call Mayor
7 Bass, Councilmember Monica Rodriguez, and others. See Hoang Decl., ¶ 3; [Exhibit B](#)
8 to Hoang Decl. Counsel for the City who were copied on the email, Deputy City
9 Attorneys Arlene Hoang and Jessica Mariani, were out of the office on that date, which
10 was communicated to LA Alliance. See Hoang Decl., ¶ 4; [Exhibit C](#) to Hoang Decl.

- 11 ● If LA Alliance believed the evidence it presented in support of its Motion
12 was insufficient, and that it needed additional evidence to be presented at
13 the hearing, it should have raised the issue much sooner than 6 calendar
14 days before the original hearing. *See, e.g., Mullane v. Central Hanover*
15 *Bank & Trust Co.*, [339 U.S. 306, 314](#) (“An elementary and fundamental
16 requirement of due process in any proceeding which is to be accorded
17 finality is notice reasonably calculated, under all the circumstances, to
18 apprise interested parties of the pendency of the action and afford them an
19 opportunity to present their objections.”); *Roberts v. Marshall*, [627 F.3d](#)
20 [768, 773](#) (9th Cir. 2010) (“District courts have limited resources (especially
21 time), and to require them to conduct further evidentiary hearings when

1 there is already sufficient evidence in the record to make the relevant
2 determination is needlessly wasteful.”).

- 3 • The City has previously objected to testimony by the witnesses identified
4 by LA Alliance [[Dkt. 806](#)], and the City maintains and re-asserts its
5 objections here.¹ LA Alliance once again attempts to call high-ranking
6 “apex” witnesses, including the Mayor and Councilmembers, without even
7 bothering to attempt—much less exhaust—other less burdensome and
8 intrusive ways of obtaining the information it seeks. *See, e.g., Pinn, Inc. v.*
9 *Apple Inc.*, Case No. SA 19-CV-01805-DOC-JDE, [2021WL4775969](#), at *3
10 (C.D.Cal. Sept. 10, 2021) (“the ‘apex doctrine’ is usually applied to
11 depositions but can also be applied to protect a senior executive from being
12 compelled to appear at trial.”) (citing *Reddy v. Nuance Commc’ns, Inc.*, No.
13 5:11-CV-05632-PSG, [2015 WL 4648008](#) (N.D.Cal. Aug. 5, 2015)).

15 ¹ In addition to the objections regarding testimony from City elected officials, to the
16 extent that LA Alliance seeks to question any City witness about the thought processes
17 or motives behind the decision-making of elected officials in their capacity as
18 policymakers, City maintains and re-asserts its objection based on the deliberative
19 process privilege, which protects from disclosure “the decision making processes of
20 government agencies.” *See, e.g., William Jefferson & Co., Inc. v. Bd. of Assessment and*
21 *Appeals No. 3 for Orange County*, [482 Fed. Appx. 273, 274](#) (9th Cir. 2012) (no abuse of
discretion in granting protective order on basis of privileges, including deliberative
process privilege); *Bd. of Supervisors v. Superior Court*, [32 Cal.App.4th 1616, 1625-26](#)
(1995); *County of Los Angeles v. Superior Court*, [13 Cal.3d 721, 727](#) (1975) (“the
authorities, both in California and more generally, make clear that the rule barring
judicial probing of lawmakers’ motivations applies to local legislators as well as to
members of the state Legislature or of Congress.”).

1 Indeed, heads of government agencies, like those LA Alliance seeks
2 testimony from, are not normally subject to discovery “absent extraordinary
3 circumstances.” *Green v. Baca*, 226 F.R.D. 624, 648 (C.D.Cal. 2005)
4 (citing *Kyle Eng. Co. v. Kleppe*, 600 F.2d 226, 231–32 (9th Cir. 1979)).
5 That is because seeking apex testimony from high-level executives “creates
6 a tremendous potential for abuse or harassment.” *Apple Inc. v. Samsung*
7 *Electronics Co., Ltd.*, 282 F.R.D. 259, 263 (N.D.Cal. 2012). LA Alliance
8 has not tried to meet its burden to justify the apex testimony it seeks
9 (because it cannot), leading to the conclusion that its request had the effect
10 of or is intended to abuse and harass the City and its elected officials.

11 **The Order Setting The Evidentiary Hearing Should Be Amended**

12 Because LA Alliance’s Response violates due process, this Court’s procedures,
13 and several Local Rules, the Court should strike the Response, and set an appropriate
14 briefing schedule on the receivership issue in accordance with the Court’s Procedures
15 and the Local Rules. The hearing on the Motion for Order Re Settlement Agreement
16 Compliance [Dkt. 863], and LA Alliance’s late request for a receiver [Dkt. 899], should
17 be continued from May 27 to an appropriate hearing date that allows for a proper
18 briefing schedule, and should not be heard or resolved at the May 15 or the May 27
19 hearing.

20 In addition, the Order Setting the May 27, 2025 Hearing [Dkt. 900] improperly
21 attempts to include in that hearing an alleged potential breach of the Roadmap

1 Agreement [[Dkt. 185](#)]. However, no motion has been filed contending a breach of the
2 Roadmap Agreement by the City, and neither party to the Roadmap Agreement has
3 sought resolution of any dispute by this Court. LA Alliance is not a party to the
4 Roadmap Agreement, therefore its request for an evidentiary hearing on the Roadmap
5 Agreement is procedurally improper, prejudicial, violates the City's due process rights,
6 inappropriate and unnecessary.

7 In light of the foregoing and the current posture of this case, the witnesses
8 identified by LA Alliance, including the Mayor, as well as Council President Harris-
9 Dawson, will not be present at the May 15 hearing. Persons knowledgeable and with
10 authority to speak on the remainder of the issues to be addressed at the May 15 hearing
11 pursuant to the Court's March 31, 2025 and May 8, 2025 Orders [[Dkt. 880](#) and 898] will
12 be in attendance on behalf of City.

13 DATED: May 13, 2025

14 HYDEE FELDSTEIN SOTO, City Attorney
15 DENISE C. MILLS, Chief Deputy City Attorney
16 KATHLEEN KENEALY, Chief Asst City Attorney
17 ARLENE N. HOANG, Deputy City Attorney
18 JESSICA MARIANI, Deputy City Attorney

19 By: /s/ Arlene N. Hoang

20 Arlene N. Hoang, Deputy City Attorney
21 Counsel for Defendant City of Los Angeles

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Attorneys for Defendant
CITY OF LOS ANGELES

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

LA ALLIANCE FOR HUMAN RIGHTS,
et al.,

Plaintiffs,

v.

CITY OF LOS ANGELES, a Municipal
entity, et al.,

Defendants.

Case No. 2:20-cv-02291 DOC (KES)
Hon. David O. Carter
United States District Judge

**DECLARATION OF ARLENE N.
HOANG IN SUPPORT OF
DEFENDANT CITY OF LOS
ANGELES' OBJECTIONS TO LA
ALLIANCE'S RESPONSE RE
ISSUES RAISED BY COURT ON
MARCH 27, 2025 [[DKT. 899](#)] AND
REQUEST FOR APEX
TESTIMONY [NO DKT.]**

Date: May 15, 2025

Time: 9:00 a.m.

Location: First Street Courthouse
Courtroom 1

DECLARATION OF ARLENE N. HOANG

I, Arlene N. Hoang, hereby declare:

1. I am an attorney duly licensed to practice law in the State of California and the United States District Court, Central District of California. I am a Deputy City Attorney with the Los Angeles City Attorney's Office, and I am one of the attorneys for Defendant City of Los Angeles ("City") in the above-captioned litigation, *LA Alliance et al. v. City of Los Angeles, et al.*, Case No. 20-CV-02291 DOC (KES) ("*Alliance* case"). I have personal knowledge of the facts set forth in this Declaration, except for those facts which are based on my information and belief and upon that basis believe them to be true, and if called upon to testify to the truth of these matters, I could and would competently do so.

2. Attached hereto as Exhibit A is a true and correct copy of the Notice of Electronic Filing I received in the *Alliance* case for Document Number 899, which indicates the transaction was entered at 8:47 pm PDT and filed on May 8, 2025.

3. Attached hereto as Exhibit B is a true and correct copy of an email I received from counsel for Plaintiffs, Elizabeth Mitchell, dated May 9, 2025 at 12:13 pm.

4. I was out of the office on May 8 and May 9, 2025, and I scheduled an automated reply to incoming email messages advising of my absence, as well as my return date of Monday, May 12, 2025. Attached hereto as Exhibit C is a true and correct copy of an outgoing "out of office" email located in my "sent" folder addressed to Ms. Mitchell dated May 9, 2025 at 12:14 pm. My colleague, Deputy City Attorney Jessica Mariani, who is also one of the attorneys for the City in the *Alliance* case and another named recipient on Ms. Mitchell's May 9 email, was also out of the office on May 9. I am informed and believe that Ms. Mariani scheduled an automated reply to incoming email messages advising of her absence.

I declare under penalty of perjury under the laws of the State of California and the United States of America that the foregoing is true and correct, and that this Declaration

1 was executed on May 13, 2025, at Los Angeles, California.

2 

3
4 Arlene N. Hoang

EXHIBIT A



Arlene Hoang <arlene.hoang@lacity.org>

Activity in Case 2:20-cv-02291-DOC-KES LA Alliance for Human Rights et al v. City of Los Angeles et al Response

cacd_ecfmail@cacd.uscourts.gov <cacd_ecfmail@cacd.uscourts.gov>

Thu, May 8, 2025 at 8:47 PM

To: ecfnef@cacd.uscourts.gov

This is an automatic e-mail message generated by the CM/ECF system. Please DO NOT RESPOND to this e-mail because the mail box is unattended.

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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

Notice of Electronic Filing

The following transaction was entered by Mitchell, Elizabeth on 5/8/2025 at 8:47 PM PDT and filed on 5/8/2025

Case Name: LA Alliance for Human Rights et al v. City of Los Angeles et al

Case Number: [2:20-cv-02291-DOC-KES](#)

Filer: LA Alliance for Human Rights

WARNING: CASE CLOSED on 09/29/2023

Document Number: [899](#)

Docket Text:

RESPONSE filed by Plaintiff LA Alliance for Human Rights *Plaintiff LA Alliance's Response re Issues Raised by Court on March 27, 2025; Points and Authorities in Support* (Attachments: # (1) Declaration of Elizabeth A. Mitchell, # (2) Exhibit 1 - LAHSA Memo, April 7, 2025, # (3) Exhibit 2 - LAHSA JPA, February 28, 2001)(Mitchell, Elizabeth)

2:20-cv-02291-DOC-KES Notice has been electronically mailed to:

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2:20-cv-02291-DOC-KES Notice has been delivered by First Class U. S. Mail or by other means BY THE FILER to :

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William R Wise , Jr
Elder Law and Disability Rights Center

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:C:\fakepath\1_LA Alliance's Response re Issues Raised by Court.pdf

Electronic document Stamp:

[STAMP cacdStamp_ID=1020290914 [Date=5/8/2025] [FileNumber=40079901-0]
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e6396d26eb168e1021d359aa3b0a49b0b03f10954feb162c49aebefedc33]]

Document description:Declaration of Elizabeth A. Mitchell

Original filename:C:\fakepath\2_Mitchell Declaration ISO Response.pdf

Electronic document Stamp:

[STAMP cacdStamp_ID=1020290914 [Date=5/8/2025] [FileNumber=40079901-1]
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1f34683857c259302da5091aa0beb52fe3e3f2dd51385fa9baed9847f094]]

Document description:Exhibit 1 - LAHSA Memo, April 7, 2025

Original filename:C:\fakepath\3_Ex. 1 LAHSA Memo April 7 2025.pdf

Electronic document Stamp:

[STAMP cacdStamp_ID=1020290914 [Date=5/8/2025] [FileNumber=40079901-2]
[0fe93ffd4e6c408d23a890b92d1171b560033782730604b38a7850791a95b88f739a
387ea6e257b1f81950c165b200d90aaf652b0b9f5489738de103cc813954]]

Document description:Exhibit 2 - LAHSA JPA, February 28, 2001

Original filename:C:\fakepath\4_Ex. 2 LAHSA JPA February 28 2001.pdf

Electronic document Stamp:

[STAMP cacdStamp_ID=1020290914 [Date=5/8/2025] [FileNumber=40079901-3]
[7a1f0f7b782faf3e8e089fe8afba02a4981115be894e09191ed2c2621d35b52b000a
44350b9529cd105e73b4ffb5452b8517f056c82c25e511c697a125186559]]

EXHIBIT B



Arlene Hoang <arlene.hoang@lacity.org>

LA Alliance - May 15 hearing

Elizabeth Mitchell <elizabeth@umklaw.com>

Fri, May 9, 2025 at 12:13 PM

To: DOCChambers <doc_chambers@cacd.uscourts.gov>

Cc: David Carter <david_carter@cacd.uscourts.gov>, "michele@michelecmartinez.com" <michele@michelecmartinez.com>, Matthew Umhofer <matthew@umklaw.com>, Jessica Mariani <jessica.mariani@lacity.org>, Arlene Hoang <arlene.hoang@lacity.org>

Dear Judge Carter:

We write to clarify the subject of the testimony to be presented on May 15. As we understand it, the court will hold an evidentiary hearing on whether or not the City has breached and is still in breach of the City/Alliance settlement agreement, including and especially whether the City has used best efforts to hit its milestones as required by the agreement. Is this correct?

Assuming that's the case, we anticipate calling witnesses (Mayor Bass, Councilmember Rodriguez, Special Master Martinez, and potentially Paul Webster and/or representatives from A&M), and then would expect the City to call witnesses thereafter. I anticipate such a hearing would take maybe 6-8 hours (in addition to the other topics on the Court's agenda for the hearing). We are ready and able to start the hearing next Thursday or we can start the following week when the Court has a day to dedicate to the evidentiary hearing, apart from the other things we will be discussing Thursday which I anticipate will take up at least a few hours.

Best,

Liz

ELIZABETH A. MITCHELL*Partner*

UMHOFER, MITCHELL & KING LLP

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[898-00] Minute Order re 2025-05-15 Hearing.1.pdf
120K

EXHIBIT C



Arlene Hoang <arlene.hoang@lacity.org>

Out of Office Re: LA Alliance - May 15 hearing

1 message

Arlene Hoang <arlene.hoang@lacity.org>
To: elizabeth@umklaw.com

Fri, May 9, 2025 at 12:14 PM

Hello,

I am out of the office, and I will not be regularly checking email nor will I have access to my phone. I will respond to you as soon as possible upon my return on Monday, May 12. If you need immediate assistance, please contact my supervisor, Gabriel Dermer, or my legal assistant, Evelyn Rodriguez. Please note that ex parte notice is not accepted during my absence from work.

--

Arlene Hoang
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Office of the Los Angeles City Attorney
Business and Complex Litigation Division
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