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7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

10
11 LA ALLIANCE FOR HUMAN
12 RIGHTS, *et al.*,

13 Plaintiffs,

14 v.

15 CITY OF LOS ANGELES, *et al.*,

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

Assigned to Judge David O. Carter

**PLAINTIFF'S REQUEST FOR
JUDICIAL NOTICE**

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

Plaintiff LA Alliance for Human Rights (“LA Alliance” or “Plaintiff”) respectfully requests pursuant to Rule 201 of the Federal Rules of Evidence that the Court take judicial notice of the following documents in connection with the evidentiary hearing which commenced on May 27, 2025.

This Court may take judicial notice of a fact “not subject to reasonable dispute because it (1) is generally known within the trial court’s territorial jurisdiction; or (2) can be accurately and readily determined from sources whose accuracy cannot reasonably be questioned.” Fed R. Evid. 201(b). A court “must take judicial notice if a party requests it and the court is supplied with the necessary information.” Fed. R. Evid. 201(c)(2).

a. Documents Filed in Federal District Courts

“[T]he Court may take judicial notice of matters of public record.” Moore v. Navarro, 2004 WL 783104, at *2 (N.D. Cal. Mar. 31, 2004). Such “matters of public record” include documents filed in federal district courts. See MGIC Indem. Corp. v. Weisman, 803 F.2d 500, 504 (9th Cir. 1986) (taking judicial notice of a motion to dismiss filed in a separate, prior matter); Ray v. Lara, 31 F.4th 692, 702 n.4 (9th Cir. 2022) (“We may take judicial notice of district court records.”).

Plaintiff requests that the Court take judicial notice of the following documents filed on the public docket in this case:

Ex.	Date	ECF No.	Description	Beg Bates	End Bates
1	6/18/20	136	Roadmap binding term sheet	LA ALLIANCE_000001	LA ALLIANCE_000002
2	10/13/20	185-1	MOU Between the County and City of Los Angeles	LA ALLIANCE_000003	LA ALLIANCE_000014
3	10/20/20	186-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000015	LA ALLIANCE_000017
4	5/1/21	204-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000018	LA ALLIANCE_000020
5	4/15/21	267-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000021	LA ALLIANCE_000025

6	7/15/21	342-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000026	LA ALLIANCE_000028
7	10/15/21	356-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000029	LA ALLIANCE_000033
8	1/18/22	383-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000034	LA ALLIANCE_000039
9	4/22/22	414-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000040	LA ALLIANCE_000045
10	7/22/22	460-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000046	LA ALLIANCE_000052
11	10/14/22	482-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000053	LA ALLIANCE_000058
12	1/17/23	515-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000059	LA ALLIANCE_000065
13	1/26/23	523-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000066	LA ALLIANCE_000072
14	4/21/23	538-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000073	LA ALLIANCE_000079
15	7/17/23	599-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000080	LA ALLIANCE_000086
16	10/16/23	651-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000087	LA ALLIANCE_000092
17	1/16/24	661-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000093	LA ALLIANCE_000099
18	4/17/24	729-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000100	LA ALLIANCE_000106
19	7/15/24	756-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000107	LA ALLIANCE_000112
20	10/18/24	796-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000113	LA ALLIANCE_000118
21	1/22/25	587-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000119	LA ALLIANCE_000124
22	4/15/25	891-1	Homelessness Roadmap Quarterly Report	LA ALLIANCE_000125	LA ALLIANCE_000130
23	5/14/25	905	A&M Independent Assessment of City-Funded Homelessness Assistance Programs	LA ALLIANCE_000131	LA ALLIANCE_000290
24	5/24/22	429-1	Amended Fully Executed Stipulation Order of Dismissal as to Defendant City of Los Angeles - Ex. 1, Settlement Agreement	LA ALLIANCE_000292	LA ALLIANCE_000319

1	26	1/17/23	516-1	Alliance Settlement Agreement Quarterly Report	LA ALLIANCE_000320	LA ALLIANCE_000326
2	27	4/21/23	539-1	Alliance Settlement Agreement Quarterly Report	LA ALLIANCE_000327	LA ALLIANCE_000333
3	28	7/17/23	598-1	Alliance Settlement Agreement Quarterly Report	LA ALLIANCE_000334	LA ALLIANCE_000341
4	29	10/16/23	652-1	Alliance Settlement Agreement Quarterly Report	LA ALLIANCE_000342	LA ALLIANCE_000349
5	30	1/16/24	660-1	Alliance Settlement Agreement Quarterly Report	LA ALLIANCE_000350	LA ALLIANCE_000357
6	31	4/15/24	728-1	Alliance Settlement Agreement Quarterly Report	LA ALLIANCE_000358	LA ALLIANCE_000365
7	32	7/15/24	757-1	Alliance Settlement Agreement Quarterly Report	LA ALLIANCE_000366	LA ALLIANCE_000373
8	33	10/18/24	797-1	Alliance Settlement Agreement Quarterly Report	LA ALLIANCE_000374	LA ALLIANCE_000379
9	34	1/22/25	858-1	Alliance Settlement Agreement Quarterly Report	LA ALLIANCE_000380	LA ALLIANCE_000384
10	35	4/15/25	892-1	Alliance Settlement Agreement Quarterly Report	LA ALLIANCE_000385	LA ALLIANCE_000390
11	37	2/20/25	863	LA Alliance Motion for Order re Settlement Agreement Compliance	LA ALLIANCE_000397	LA ALLIANCE_000416
12	38	2/20/25	863-1	Mitchell Declaration	LA ALLIANCE_000417	LA ALLIANCE_000420
13	39	2/20/25	863-2	Ex. A - Settlement Agreement	LA ALLIANCE_000421	LA ALLIANCE_000449
14	40	2/20/25	863-3	Ex. B - Order Approving Stipulated Dismissal and Proposed Settlement	LA ALLIANCE_000450	LA ALLIANCE_000453
15	41	2/20/25	863-4	Ex. C - Alliance Potential Project List	LA ALLIANCE_000454	LA ALLIANCE_000462
16	42	2/20/25	864-5	Ex. D - Housing-Shelter Alliance Milestones	LA ALLIANCE_000463	LA ALLIANCE_000464
17	43	2/20/25	863-6	Ex. E - Encampment Engagement, Cleaning, and Resolution	LA ALLIANCE_000465	LA ALLIANCE_000473
18	44	2/20/25	863-7	Ex. F - Report from City re Homelessness Emergency Account, Dec. 26, 2024	LA ALLIANCE_000474	LA ALLIANCE_000518
19	45	2/20/25	863-8	Ex. G - Demand for Breach of Settlement Agreement, Aug. 16, 2024	LA ALLIANCE_000519	LA ALLIANCE_000521

1	46	2/20/25	863-9	Ex. H. - Notice of Violation of Settlement Agreement	LA ALLIANCE_000522	LA ALLIANCE_000524
2	47	2/20/25	863-10	Ex. I - Encampment Milestones	LA ALLIANCE_000525	LA ALLIANCE_000526
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4	48	3/6/25	871	City of Los Angeles Opposition to Motion for Order re Settlement Agreement Compliance	LA ALLIANCE_000527	LA ALLIANCE_000546
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6	49	3/13/25	872	LA Alliance Reply ISO Motion for Order re Settlement Agreement Compliance	LA ALLIANCE_000547	LA ALLIANCE_000561
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8	50	3/13/25	872-1	Mitchell Declaration	LA ALLIANCE_000562	LA ALLIANCE_000564
9	51	3/13/25	872-2	Ex.1 - Email dated Jan. 15, 2025	LA ALLIANCE_000565	LA ALLIANCE_000567
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11	52	3/24/25	874	Order re Plaintiff's Motion re Settlement Agreement Compliance	LA ALLIANCE_000568	LA ALLIANCE_000569
12						
13	53	5/8/25	899	Plaintiff's Response re Issues Raised by Court on March 27, 2025	LA ALLIANCE_000570	LA ALLIANCE_000613
14	54	5/8/25	899-1	Mitchell Declaration	LA ALLIANCE_000614	LA ALLIANCE_000616
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16	55	5/8/25	899-2	Ex. 1 - LAHSA Memo TLS Beds Open to Date dna Clients Served in Roadmap Reports	LA ALLIANCE_000617	LA ALLIANCE_000619
17	56	5/8/25	899-3	Ex. 2 - LAHSA JPA Agreement, Feb. 28, 2001	LA ALLIANCE_000620	LA ALLIANCE_000634
18						
19	57	5/13/25	903	City Objections to Response re Issues Raised by the Court on March 27, 2025	LA ALLIANCE_000635	LA ALLIANCE_000642
20	58	2/7/24	668-1	LA Alliance Encampment Milestones Goals	LA ALLIANCE_000643	LA ALLIANCE_000651
21						
22	60	7/15/24	757-2	Alliance Settlement Agreement Encampment Quarterly Reports	LA ALLIANCE_000653	LA ALLIANCE_000654
23	61	10/18/24	797-2	Alliance Settlement Agreement Encampment Quarterly Reports	LA ALLIANCE_000655	LA ALLIANCE_000656
24	62	1/22/25	858-2	Alliance Settlement Agreement Encampment Quarterly Reports	LA ALLIANCE_000657	LA ALLIANCE_000658
25						
26	63	4/15/25	892-2	Alliance Settlement Agreement Encampment Quarterly Reports	LA ALLIANCE_000659	LA ALLIANCE_000660
27	64	2/7/24	668	LA Alliance Motion for Order re Settlement Agreement Compliance and for Sanctions	LA ALLIANCE_000661	LA ALLIANCE_000682
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1	65	2/7/24	668-1	Michell Declaration and Exs. A-J	LA ALLIANCE_000683	LA ALLIANCE_000767
2	66	2/12/24	669	City Opposition to Motion for Order re Settlement Agreement Compliance and for Sanctions	LA ALLIANCE_000768	LA ALLIANCE_000788
3	67	2/12/24	669-1	Marcus Declaration	LA ALLIANCE_000789	LA ALLIANCE_000799
4	68	2/12/24	669-2	Ex. 1 - City Correspondence re Homelessness Emergency Account, Feb. 1, 2024	LA ALLIANCE_000800	LA ALLIANCE_000823
5	69	2/12/24	669-3	Ex. 2 - City Correspondence re Homelessness Emergency Declaration - 2023-24 First Quarterly Report, Oct. 13, 2023	LA ALLIANCE_000824	LA ALLIANCE_000844
6	70	2/12/24	669-4	Ex. 3 - City Correspondence re Homelessness Emergency Declaration - Supplemental 2023-24 First Quarterly Report, Oct. 27, 2023	LA ALLIANCE_000845	LA ALLIANCE_000852
7	71	2/12/24	669-5	Ex. 4 - City Correspondence re Homelessness Emergency Declaration - 2023-24 Second Quarterly Report, Jan. 12, 2024	LA ALLIANCE_000853	LA ALLIANCE_000867
8	72	2/12/24	669-6	Ex. 5 - City Correspondence re Alliance Settlement Agreement Progress as of September 30, 2023, Dec. 1, 2023	LA ALLIANCE_000868	LA ALLIANCE_000883
9	73	2/13/24	670	Intervenorrss' Opposition and Objections to Motion for Sanctions	LA ALLIANCE_000884	LA ALLIANCE_000895
10	74	2/22/24	672	LA Alliance Reply ISO Motion for Order re Settlement Agreement Compliance and Sanctions	LA ALLIANCE_000896	LA ALLIANCE_000912
11	75	2/22/24	672-1	Mitchell Declaration and Exs. K-O	LA ALLIANCE_000913	LA ALLIANCE_000938
12	76	9/4/24	767	LA Alliance Motion for Order re Settlement Agreement Compliance	LA ALLIANCE_000939	LA ALLIANCE_000945
13	77	9/4/24	767-1	Mitchell Declaration	LA ALLIANCE_000946	LA ALLIANCE_000948
14	78	9/4/24	767-2	Ex. A - LA Alliance Encampment Milestone Goals	LA ALLIANCE_000949	LA ALLIANCE_000949
15	79	9/11/24	774	City Opposition to Motion for Order re Settlement Agreement Compliance	LA ALLIANCE_000950	LA ALLIANCE_000956

80	9/18/24	776	LA Alliance Reply ISO Motion for Order re Settlement Agreement Compliance	LA ALLIANCE_000957	LA ALLIANCE_000963
81	3/24/25	874	Order re Plaintiff's Motion re Settlement Agreement Compliance [767]	LA ALLIANCE_000964	LA ALLIANCE_000965
90	2/29/24	674	Special Master Independent Monitoring Report Year One	LA ALLIANCE_001252	LA ALLIANCE_001276
93	5/14/25	904	Special Master Independent Monitoring Report and Recommendations No. 2	LA ALLIANCE_001420	LA ALLIANCE_001466
113	9/12/24	775	City of Los Angeles Proposed Bed Plan	LA ALLIANCE_001547	LA ALLIANCE_001549
131	3/7/25	878	Transcript Mar. 27, 2025 Hearing re Mot. for SA Comp.	LA ALLIANCE_001686	LA ALLIANCE_001809
133	5/15/25	909	Transcript May 15, 2025 Status Conference re A&M Audit	LA ALLIANCE_001819	LA ALLIANCE_001859
140	12/14/21	373	Joint Status Report re MOU	LA ALLIANCE_001960	LA ALLIANCE_002003

b. Hearings and Public Records from a Government Agency

“[B]ecause of their perceived reliability, courts have often admitted records taken from websites maintained by government agencies.” Rollins v. Dignity Health, 338 F. Supp. 3d 1025, 1032 (N.D. Cal. 2018). Likewise, “[a] government agency’s records will often be judicially noticeable because they are public records.” Id.

Plaintiff requests that the Court take judicial notice of the following documents and media sourced from the City and other public agencies:

Ex.	Date	Description	Beg Bates	End Bates
24	11/11/22	Housing-Shelter Alliance Milestones	LA ALLIANCE_000291	LA ALLIANCE_000291
82	3/23/01	HUD Audit re LAHSA	LA ALLIANCE_000966	LA ALLIANCE_000977
83	6/8/07	HUD Audit re LAHSA	LA ALLIANCE_000978	LA ALLIANCE_000993
84	6/4/18	LA County Auditor Follow Up Review of LAHSA	LA ALLIANCE_000994	LA ALLIANCE_001025

85	8/28/19	LA City Controller Audit Improving LAHSA Outreach Program	LA ALLIANCE_001026	LA ALLIANCE_001074
86	10/8/19	LA City Controller Review of Proposition HHH	LA ALLIANCE_001075	LA ALLIANCE_001148
87	2/5/21	County of Los Angeles LAHSA Audit	LA ALLIANCE_001149	LA ALLIANCE_001158
88	1/20/22	HUD Audit re LAHSA	LA ALLIANCE_001159	LA ALLIANCE_001201
89	12/5/23	LA City Controller Audit Interim Housing Bed Availability Data	LA ALLIANCE_001202	LA ALLIANCE_001251
91	11/19/24	County of Los Angeles LAHSA Audit	LA ALLIANCE_001277	LA ALLIANCE_001333
92	12/10/24	LA City Controller Homelessness Audit: Pathways to Permanent Housing	LA ALLIANCE_001334	LA ALLIANCE_001419
94		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 1	LA ALLIANCE_001467	LA ALLIANCE_001467
95		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 2	LA ALLIANCE_001468	LA ALLIANCE_001468
96		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 3	LA ALLIANCE_001469	LA ALLIANCE_001468
97		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 4	LA ALLIANCE_001470	LA ALLIANCE_001470
98		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 5	LA ALLIANCE_001471	LA ALLIANCE_001471
99		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 6	LA ALLIANCE_001472	LA ALLIANCE_001472
100		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 7	LA ALLIANCE_001473	LA ALLIANCE_001473
101		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 8	LA ALLIANCE_001474	LA ALLIANCE_001474
102		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 9	LA ALLIANCE_001475	LA ALLIANCE_001475

1	103		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 10	LA ALLIANCE_001476	LA ALLIANCE_00146
2	104		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 11	LA ALLIANCE_001477	LA ALLIANCE_001477
3	105		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 12	LA ALLIANCE_001478	LA ALLIANCE_001478
4	106		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 13	LA ALLIANCE_001479	LA ALLIANCE_001479
5	107		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 14	LA ALLIANCE_001480	LA ALLIANCE_001480
6	108		2022 Greater Los Angeles Homeless Count - City of Los Angeles Council District 15	LA ALLIANCE_001481	LA ALLIANCE_001481
7	114	11/9/22	LA Alliance Milestones Potential Project List	LA ALLIANCE_001550	LA ALLIANCE_001557
8	127	2/6/25	City of Los Angeles Correspondence: Proposition HHH Quarterly Report - Fourth Quarter fo Fiscal Year 2023-2024	LA ALLIANCE_001649	LA ALLIANCE_001663
9	128	1/19/25	City of Los Angeles Correspondence: Amendment to Proposition HHH FY 2020-2021 Project Expenditure Plan	LA ALLIANCE_001664	LA ALLIANCE_001678
10	129	7/7/23	City of Los Angeles Resolution re state of local emergency concerning PEH	LA ALLIANCE_001679	LA ALLIANCE_001679
11	134	6/28/24	LAHSA-greater-los-angeles-homeless-count-result	LA ALLIANCE_001860	LA ALLIANCE_001901
12	135		Homeless Mortality Report 2017-2023 (March 2025)	LA ALLIANCE_001902	LA ALLIANCE_001928
13	137	4/7/23	Statement Bass City Attorney Feldstein Soto	LA ALLIANCE_001935	LA ALLIANCE_001936
14	142	6/29/16	Final Resolution re Prop HHH	LA ALLIANCE_002019	LA ALLIANCE_002032
15	143	10/8/19	Report: The High Cost of Homeless Housing: Review of Proposition HHH	LA ALLIANCE_002033	LA ALLIANCE_002106
16	150	1/29/25	Video: Housing and Homelessness Committee 1-29-2025	Lodged with Court	

151	2/12/25	Video: Housing and Homelessness Committee 2-12-2025	Lodged with Court	
152	5/20/25	Video: Regular City Council 5-20-2025	Lodged with Court	
153		Video: Mayor Karen Bass State of The City 2025	Lodged with Court	
154	5/1/25	Video: Budget Hearing 5-1-2025	Lodged with Court	
155	9/9/21	Video: Homelessness and Poverty Committee - September 9, 2021 (at time 43:43)	https://www.youtube.com/watch?v=ejvGxroTL6Q&t=2622s	
156	9/22/22	Video: Homelessness and Poverty Committee - September 22, 2022 10:00 AM (at time 56:04)	https://www.youtube.com/watch?v=Wlt4WHSMU2I&t=3364s	
157	8/2/23	Video: Housing and Homelessness Committee - August 02, 2023 02:00 PM (at time 1:27:37)	https://www.youtube.com/watch?v=MWyLexzTu9M&t=5257s	
158	5/22/25	Video: Regular City Council - May 22, 2025 (at time 7:39:31)	https://www.youtube.com/watch?v=294R1lr1uZ8&t=27571s	

Dated: June 3, 2025

Respectfully submitted,

/s/ Matthew Donald Umhofer

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