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IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

LA ALLIANCE FOR HUMAN RIGHTS,
et al.,

Plaintiffs,

v.

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

Defendant.

CASE NO. 2:20-cv-02291 DOC (KES)

Honorable David O. Carter,
United States District Judge

**JOINT STATUS REPORT
REGARDING CITY COUNCIL
CONSIDERATION OF PROPOSED
THIRD-PARTY MONITORS**

Action Filed: March 10, 2020

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JOINT PORTION OF STATUS REPORT

As required by the Court’s October 2, 2025 Order, Dkt. 1039, the City of Los Angeles (“City”) and Plaintiff LA Alliance for Human rights (“LA Alliance,” together with the City, the “Parties”) submit this Joint Status Report regarding the Los Angeles City Council’s consideration of the proposed Third-Party Monitors.

The City Council was on recess from September 23 to September 24 in observance of Rosh Hashanah. The City Council was first scheduled to vote on the proposed Third-Party Monitors at its September 26, 2025 meeting. *See* <https://lacity.primegov.com/Portal/Meeting?meetingTemplateId=145640> (agenda item 21). On September 26, 2025, however, the City Council continued consideration of the Third-Party Monitors to October 1, to allow more time for the collection and review of relevant information. At the October 1, 2025 City Council meeting, the vote was again continued because the City Council had not yet received all necessary information to consider the proposed Third-Party Monitors from the proposed Monitors, including proposed scopes of work and proposed budgets. *See* <https://lacity.primegov.com/Portal/Meeting?meetingTemplateId=146129> (agenda item 45).

The City Council has now received proposals from both Mr. Galperin and Mr. Garrie that are publicly available in Council File No. 20-0263-S4. *See* <https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?fa=ccfi.viewrecord&cfnumber=20-0263-S4>. The City Council’s vote on the proposed Third-Party Monitors is now scheduled for October 7, 2025, which is the next City Council meeting.

The Parties will notify the Court of the outcome of the October 7, 2025 City Council vote promptly after a decision is made regarding the Third-Party Monitors.

PLAINTIFFS’ SEPARATE PORTION OF STATUS REPORT

Plaintiff LA Alliance for Human Rights notes that its counsel has repeatedly requested to be included in the negotiations on scope of work (“SOW”) for the monitors, pursuant to court order (ECF 991) and Section 7.2 of the Settlement

1 Agreement, yet the City has failed to do so. The City failed to respond to Plaintiff's
2 amended proposed SOW which was sent to the City, Mr. Galperin, and Mr. Garrie on
3 September 25, 2026. The City apparently received a letter from Mr. Galperin on
4 October 1, 2025 with a separate proposed SOW, which was not provided to Plaintiff
5 but simply placed on the clerk's website. Within that letter Mr. Galperin referenced a
6 totally different SOW sent to him by the L.A. City Attorney's Office on September 30,
7 2025 which was also not provided to Plaintiff. To date, Plaintiff has not seen nor
8 reviewed it. The lack of cooperation by the City has caused inexcusable delay in
9 approving the monitors and moving this process forward. The City's recalcitrance is
10 palpable and should not be permitted to continue. Plaintiff requests the Court order—
11 again—the City to cooperate with Plaintiff on negotiating the SOW with Mr. Garrie
12 and Mr. Galperin.

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14 DATED: October 3, 2025

UMHOFER, MITCHELL & KING LLP

15
16 By: /s/ Elizabeth A. Mitchell
17 Elizabeth A. Mitchell
18 Attorneys for Plaintiffs

19
20 DATED: October 3, 2025

GIBSON, DUNN & CRUTCHER LLP

21 By: /s/ Theane Evangelis
22 Theane Evangelis

23 Attorneys for Defendant
CITY OF LOS ANGELES

24 Local Rule 5-4.3.4 Attestation

25 I attest that all counsel of record concur in this filing's content and have
26 authorized the filing.

27 By: /s/ Theane Evangelis
28 Theane Evangelis