

Charles D. Cummings  
 Gary A. Kovacic  
 D. Daniel Pranata  
 Karyn A. M. Jakubowski  
 Theresa M. Pranata  
 Holly E. Acevedo  
 Kristen E. Robison

Roger M. Sullivan (1926 - 2016)  
 Henry K. Workman (1926 - 2020)  
 John J. Dee (1941 - 2003)

**Author's Email Address**

gkovacic@swdlaw.net

**SULLIVAN WORKMAN & DEE, LLP**

Excellence in Eminent Domain, Real Estate and Trusts & Estates

Since 1957

Toll-free: 800.717.4990 | Fax: 213.627.7128 | swdlaw.net

**Pasadena Office** (mailing address)

600 N. Rosemead Blvd., Suite 209  
 Pasadena, California 91107-2154  
 213.624.5544 | 626.656.8700

**San Diego Office**

3111 Camino Del Rio North  
 Suite 400  
 San Diego, California 92108  
 800.717.4990

November 9, 2021

VIA: LACouncilComment.com

The Honorable City Council  
 Room 395, City Hall  
 200 North Spring Street  
 Los Angeles, CA 90012

Re: **Public Hearing to Adopt Ordinance to Acquire Certain Real Property or Interest in Real Property by Eminent Domain  
 Exposition-West Bikeway-Northvale Segment Project ("Project")  
 Council File No. 09-1295-S5  
 APNs: 4318-033-013, 4318-034-047, 4318-034-046, 4318-034-045, 4318-034-043, 4318-034-042, 4318-034-038, 4255-006-00**

Dear Sir or Madam:

Reference is made to your letters dated October 26, 2021, which include notices of a hearing concerning the adoption of a proposed Resolution of Necessity by the City of Los Angeles ("City") on November 30, 2021.

Our clients are the owners of certain parcels that are the subject of said hearing. Their names, addresses, APNs, and ROW Nos. are as follows:

<u>Name</u>	<u>Address</u>	<u>APN</u>	<u>ROW No.</u>
George and Cindy Ainslie	3165 Motor Avenue, Los Angeles, CA	4318-033-013	33922-1A
James and Audrey Greenwood	10420 Northvale Road Los Angeles, CA	4318-034-038	33922-12A

The Honorable City Council  
November 9, 2021  
Page 2

Robert Henry	10335 Walavista Road Los Angeles, CA	4318-034-047	33922-3A
S. Zachary and Elana Samuels	10384 Northvale Road Los Angeles, CA	4318-034-042	33922-8A
Bruce and Carol Simon	10378 Northvale Road Los Angeles, CA	4318-034-043	33922-7A

Our clients hereby request an opportunity to appear remotely before the Los Angeles City Council and be heard concerning objections to the adoption of the proposed Resolution of Necessity at the hearing set for November 30, 2021.

In the alternative, our clients request that this hearing be continued and that a meeting (comparable to the Level 1 Review, District Condemnation Evaluation Meeting, and/or Condemnation Panel Review Meeting held by Caltrans in eminent domain matters) be scheduled between our clients and appropriate city representatives (including engineers) to discuss the nature and extent of the proposed taking and project.

Our client's objections to the adoption of the proposed Resolution of Necessity are based, in part, on the following grounds:

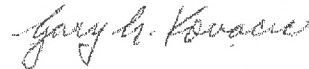
- The Project is neither planned nor located in the manner that will be most compatible with the greatest public good and the least private injury.
- Certain property interests sought to be acquired are not necessary for the Project.

Our clients reserve all their rights, claims, and remedies in the proposed eminent domain actions.

The Honorable City Council  
November 9, 2021  
Page 3

If you have any questions or comments, please contact this office at your earliest convenience.

Very truly yours,



GARY A. KOVACIC  
SULLIVAN, WORKMAN & DEE, LLP

GAK/LL

cc: George and Cindy Ainslie  
James And Audrey Greenwood  
Robert Henry  
S. Zachary and Elana Samuels  
Bruce and Carol Simon