

Communication from Public

Name: Entitle and Permits
Date Submitted: 08/28/2026 02:12 PM
Council File No: 26-1033
Comments for Public Posting: Applicant's Notice of Non-Consent to Extension; Deadline Objection; Request for Deemed Denial; and Notice of Intent to Seek Writ Relief

ENTITLE AND PERMITS

18375 Ventura Blvd., Suite 120, Tarzana, CA 91356 | Office: (310) 571-5833 | Mobile: (310) 488-1369
entitleandpermits@gmail.com | www.EntitleandPermits.com

VIA PUBLIC COMMENT PORTAL AND EMAIL - PRE-LITIGATION NOTICE

August 28, 2026

TO: Office of the City Clerk; Planning and Land Use Management Committee; Los Angeles City Council; Department of City Planning; Council District 4

IMMEDIATE ROUTING REQUEST - CITY ATTORNEY

- Place this complete letter and every exhibit in Council File 26-1033 immediately.
- Immediately transmit the complete packet to the Office of the City Attorney, including the attorney assigned to land-use and CEQA matters, before any further action on the appeal.
- Confirm by email to entitleandpermits@gmail.com that the packet was uploaded and delivered to the City Attorney.

Council File	26-1033
Environmental Case	ENV-2024-6712-CE-1A
Entitlement Cases	ZA-2025-1386-CU1-HCA-1A; ZA-2024-6711-CU1-HCA-1A
Project	2166 and 2172 North Stanley Hills Drive
Applicant of Record	Stanley Family Residence, LLC
Applicant Representative	Sam Kohanim, Entitle and Permits (identified as "Sami Kohanim" in City records)
Appellant	Concerned Citizens of Stanley Hills Drive

NOTICE OF NON-CONSENT; OBJECTION TO THE UNTIMELY SEPTEMBER 22, 2026 HEARING; DEMAND FOR RECOGNITION OF DEEMED DENIAL; NOTICE OF INTENT TO SEEK WRIT RELIEF; AND RECORD-PRESERVATION DEMAND

Entitle and Permits, through Sam Kohanim, submits this notice as the City-recognized project representative on behalf of **Stanley Family Residence, LLC** and **Rouzbeh Zarrinbakhsh** (collectively, the "Applicant Parties"). The record establishes that the September 22 PLUM hearing is outside the City Council's time to act unless the City can produce a valid, timely, mutually executed written extension. No such extension was signed or authorized by the Applicant Parties.

The City's reported internal delay does not change that conclusion. On August 28, City Council staff told Mr. Kohanim that the Council side received the file late from Planning, on or about July 30. An internal handoff between City departments cannot enlarge a statutory deadline, cannot be charged to the Applicant Parties, and cannot substitute for the Applicant's required written consent.

The Council File itself displays August 28 and August 30 as the time-limit entries. Independently, even correcting the apparent June 16 transmittal error and using the latest date supported by the actual filing record - July 1, 2026 - the 75-day period ends on **September 14, 2026**. The scheduled September 22 committee hearing is therefore untimely under either calculation, and final Council action would occur still later.

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RELIEF REQUESTED

- Acknowledge immediately that no applicant extension exists and none is consented to.
- Produce any document the City contends extended the deadline, including the complete executed writing and proof of each signatory's authority.
- Upon expiration of the applicable unextended deadline, place a City Clerk memorandum in Council File 26-1033 confirming that the CEQA appeal is denied and the underlying determinations stand.
- Do not proceed with the September 22 hearing absent a valid, timely extension.

I. RELEVANT RECORD AND CORRECTED TIMELINE

The record contains an obvious date discrepancy. The Planning transmittal lists June 16 as the "Date Appealed," but June 16 is the mailing date of the CAPC Letters of Determination. The appellant did not sign the appeal until June 30, and City Planning did not review, accept, and receipt the appeal until July 1. The City's own form also identifies July 1 as the last day to appeal. The documentary sequence is set out below.

Date	Record Event
June 16, 2026	CAPC Letters of Determination mailed. The appeal form identifies June 16 as the final entitlement determination date - not the appeal filing date.
June 30, 2026	Appellant signs the CEQA appeal application.
July 1, 2026	City Planning reviews and accepts the appeal, issues the fee receipt, and the 15-day appeal period expires.
July 27, 2026	Planning dates its transmittal to the City Clerk.
July 29-31, 2026	Council File is received/introduced and the appeal materials are referred to PLUM.
August 5, 2026	Planning states that the Clerk reported insufficient time for August legal mailing and asks Applicant to sign an extension through September 30.
August 28, 2026	The Council File still displays August 28/August 30 time-limit entries and posts a notice for a September 22 PLUM hearing.
September 14, 2026	Latest independently supportable 75-day deadline: 75 days after the July 1 expiration of the appeal period.
September 22, 2026	Scheduled PLUM hearing - eight days after September 14, before any later final Council action.

The July 1 date is not a concession that the City's displayed August deadlines are incorrect. The Applicant Parties expressly preserve the position that the City is bound by its own published time-limit entries. July 1 is used as the *latest independently supportable trigger* to demonstrate that the September 22 hearing is untimely even after resolving the City's apparent June 16 clerical error in the City's favor.

II. THE CURRENT CODE REQUIRES ACTION WITHIN 75 DAYS AND REQUIRES MUTUAL WRITTEN CONSENT FOR ANY EXTENSION

LAMC section 13B.11.1.F.7(a) provides that the City Council shall act on a CEQA appeal within 75 days after expiration of the appeal period. It further provides that the time may be extended only by **mutual written consent of the applicant and the City Council**, and that failure to act within the time limit constitutes denial of the appeal. The City's general appeal rule, LAMC section 13A.2.8.F.2, likewise states that failure to render a timely decision results in denial of the appeal.

The appeal period expired July 1. Seventy-five days later is Monday, September 14, 2026. The September 22 PLUM hearing falls eight days after that date. PLUM is an intermediate committee; it is not final action by the City Council. Thus, the scheduled hearing cannot satisfy the time limit even if the City were to treat July 1 as the operative date.

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The City's own administrative materials are even more restrictive. The Council File displays August 28 and August 30 as the "Time Limit Last Day To Act" entries. The Planning transmittal selects "Appeal Filing Date" and leaves "Received by Clerk" unchecked. Under no version of the City's own record is Council's later internal receipt on July 29 or July 30 the trigger.

III. THE CITY'S LATE INTERNAL TRANSMISSION DOES NOT TOLL OR RESTART THE DEADLINE

The City's August 28 telephone explanation confirms an internal processing delay: Council staff stated that the file was received late from Planning, on or about July 30. That explanation does not create legal additional time. The deadline is fixed by the Code and may be extended only through the Applicant's written consent. No provision identified by the City allows a department to restart the period by delaying its internal transmittal.

The record shows that the appeal was accepted and paid on July 1, but Planning did not date its transmittal until July 27 and the Council File was not received/introduced until July 29. That 28-day routing interval was entirely within the City. The Applicant Parties neither caused nor agreed to it. A City-created transmission delay cannot become an extension that the Applicant expressly declined to sign.

If the City contends otherwise, it should identify the precise Code provision that makes the Clerk's internal receipt date controlling despite (1) the current CEQA appeal provision, (2) the City's own transmittal selection, and (3) the requirement of mutual written consent.

IV. THE CITY REQUESTED AN EXTENSION BECAUSE IT KNEW THE SEPTEMBER SCHEDULE REQUIRED APPLICANT CONSENT - AND APPLICANT DID NOT CONSENT

On August 5, Planning advised that the Clerk's Office reported insufficient time to satisfy the legal mailing requirements for an August hearing. Planning therefore asked the Applicant to sign and return an extension form so the matter could be heard in September. The form identifies August 28 as the current deadline, seeks an extension to September 30, and states that the extension is based on mutual written consent.

Neither the Applicant signature line nor the Planning approval line is signed. Rouzbeh Zarrinbakhsh did not sign, return, orally accept, or otherwise agree to the extension. Sam Kohanim and Entitle and Permits did not consent and were not authorized to consent. The Applicant Parties expressly withhold consent to any extension, including any attempted retroactive extension.

As a matter of fact, on August 12, 2026, the applicant sent a written rejection to the Planning, Stacy Munoz, advising her that the extension is not granted and the applicant cannot appear after the 75-day deadline. If the City contends that any authorized person consented, it must immediately produce the signed consent form.

V. THE AUGUST 28 NOTICE DOES NOT CURE THE DECISION DEADLINE; IT CONFIRMS THE PROBLEM

The August 28 notice provides advance notice of a September 22 hearing. The Applicant Parties are not presently asserting that the notice interval itself is fewer than 24 days. The dispositive problem is separate: notice issued on August 28 could not produce a hearing, much less final Council action, by September 14. The notice therefore does not cure the time-to-act problem; it demonstrates why Planning asked for an extension on August 5.

The notice also states that any continuance is subject to time-limit constraints. That reservation should be applied now. Unless a valid extension is produced, the matter cannot lawfully remain pending for a September 22 merits hearing after the appeal has been denied by operation of the Code.

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VI. THE CITY'S OWN FORM, PRIOR PRACTICE, AND APPELLANT'S COUNSEL'S PRIOR POSITION CONFIRM THE SAME RESULT

The CEQA appeal application signed by Appellant's counsel states that if the appellate body cannot hear and consider an appeal before the last day to act, the appeal is automatically deemed **denied** and the original decision stands. It also states that the last day may be extended only if formally agreed upon by the applicant.

The City Clerk has applied the same rule in another Council-level CEQA appeal. In Council File 24-1418, the Clerk filed a memorandum stating that Council failed to act within the prescribed time and, under LAMC section 13A.2.8.F.2, the appeal was denied. City Planning likewise stated in Council File 25-1476 that an appeal filed November 13 produced a January 27 deadline - 75 days later - confirming that later internal routing does not restart the clock.

Appellant's counsel, Channel Law Group, recently urged the same interpretation in Council File 25-1518: the appeal was "deemed denied by operation of law," timely "mutual written consent" was required, and a late signature could not revive the timeline. This prior position is not offered as judicial estoppel. It confirms that the interpretation requested here is the same procedural rule Appellant's counsel asked the City to enforce for another client.

VII. DEMAND FOR ACTION, CITY ATTORNEY REVIEW, AND PRESERVATION OF RECORDS

1. **Upload.** Place this letter and all exhibits in Council File 26-1033 immediately and without alteration.
2. **City Attorney.** Immediately transmit the complete packet to the Office of the City Attorney, including assigned land-use/CEQA counsel, and confirm the transmission in writing.
3. **Non-consent.** Confirm that the Applicant Parties have not consented and do not consent to extending the City Council's time to act.
4. **Produce any alleged extension.** Within two business days, identify and produce every writing or communication the City contends constitutes an extension, together with execution dates and authority of each signatory.
5. **Deemed denial.** If no valid timely extension exists and no timely final Council decision occurs, file a City Clerk memorandum no later than the first business day after the applicable deadline confirming that the CEQA appeal is denied and the underlying determinations stand.
6. **September 22 hearing.** Remove the matter from the September 22 calendar after expiration of the unextended deadline, or provide a written legal explanation approved by the City Attorney for proceeding.
7. **Status.** Confirm in writing the resulting administrative status and the status of any appeal-related holds. This filing does not request authorization to commence work without otherwise required permits and clearances.
8. **Preservation.** Preserve all paper and electronic records concerning appeal filing, acceptance, transmittal, receipt, routing, notice, publication, scheduling, extension, consent, and the August 28 telephone explanation, including emails, texts, internal messages, drafts, routing slips, calendar entries, notes, metadata, and communications among Planning, the Clerk, PLUM, Council offices, the City Attorney, the Applicant Parties, and Appellant or counsel.

VIII. NOTICE OF INTENT TO SEEK WRIT AND INJUNCTIVE RELIEF

Formal notice: If no valid, timely, mutually executed written extension exists and the City does not provide and post written confirmation of deemed denial by **5:00 p.m. on September 15, 2026** - the first business day after the latest independently supportable September 14 deadline - or if the City proceeds with the September 22 hearing despite expiration of the deadline, the Applicant Parties will, through counsel, promptly file a petition for writ of mandate and/or prohibition and seek declaratory and injunctive relief, including temporary relief as necessary, without further notice. This packet is intended as pre-litigation notice and should be delivered to the City Attorney immediately.

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IX. CONTINUING OBJECTION AND NON-WAIVER

Any later written submission or appearance concerning the CEQA merits will be made under continuing objection and solely to preserve alternative defenses. Nothing in such participation will constitute consent to an extension, waiver of deemed denial, or agreement that the City retains authority to decide the appeal after the deadline.

Respectfully submitted,

/s/ Sam Kohanim

Sam Kohanim

Authorized Project Representative

ENTITLE AND PERMITS

For Stanley Family Residence, LLC and Rouzbeh Zarrinbakhsh

/s/ Rouzbeh Zarrinbakhsh

Rouzbeh Zarrinbakhsh

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INDEX OF EXHIBITS

Exhibit	Description
A	Official Council File 26-1033 docket excerpt updated August 28, 2026, plus August 27 preservation snapshot
B	Planning Department transmittal dated July 27, 2026 - relevant case, notice, and time-limit fields
C	Appellant's signed CEQA appeal application, including June 16 determination date, June 30 signature, July 1 acceptance/receipt, and automatic-denial General Notes
D	City Planning email dated August 5, 2026 requesting Applicant signature on an extension because August legal mailing could not be completed
E	Unsigned CP-1947 Extension of Time Request identifying August 28 as current deadline and September 30 as requested deadline
F	Official City Clerk notice dated August 28, 2026 scheduling the September 22 PLUM hearing
G	Current Los Angeles Zoning Code deadline and extension provisions - official-source excerpts
H	City Clerk Memorandum to File in Council File 24-1418 applying deemed denial for failure to act timely
I	City Planning letter in Council File 25-1476 calculating 75 days from appeal filing and requesting extension
J	Channel Law Group's March 31, 2026 deadline position in Council File 25-1518 - source summary and limited excerpts

Source convention: Exhibits A, B, G, H, I, and J include faithful transcriptions or concise source summaries prepared from the cited official City records because the full controlling documents are publicly available at the stated City URLs. Exhibits C-F and the August 27 docket snapshot are appended in their original received/filed form. The official City records control.

EXHIBIT A

Official Council File 26-1033 Docket - Updated Excerpt and Preservation Snapshot

Official source:

<https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?cfnumber=26-1033&fa;=ccfi.viewrecord>

The following updated excerpt reflects the live public docket as accessed August 28, 2026. The original August 27 preservation snapshot follows in its filed form.

OFFICIAL COUNCIL FILE 26-1033 - UPDATED DOCKET EXCERPT

Title	2166 North Stanley Hills Drive / 2172 Stanley Hills Drive / CEQA / Appeal
Date Received / Introduced	07/29/2026
Last Changed	08/28/2026
Time Limit Last Day To Act	08/30/2026; 08/28/2026 - Los Angeles Municipal Code
Pending in Committee	Planning and Land Use Management Committee
08/28/2026 Activity	PLUM scheduled the item for committee meeting on September 22, 2026.
Council Vote Information	No votes found.

Material observation: The docket posts a September 22 committee hearing while continuing to display August 28/August 30 time-limit entries and no Council vote or posted executed extension.

[Open the live official Council File](#)

This page is a faithful convenience reproduction prepared from the official public docket. The official live record controls.

CITY OF LOS ANGELES

Office of the City Clerk - Council File Management System

Preservation snapshot of the official Council File webpage
Captured from the live public record on August 27, 2026

Council File: 26-1033

Title	2166 North Stanley Hills Drive / 2172 Stanley Hills Drive / California Environmental Quality Act (CEQA) / Appeal
Date Received / Introduced	07/29/2026
Last Changed Date	07/31/2026
Expiration Date	07/29/2028
Time Limit Last Day To Act Pursuant To	08/30/2026 08/28/2026 Los Angeles Municipal Code
Reference Numbers	Cases: ZA-2025-1386-CU1-HCA-1A; ZA-2024-6711-CU1-HCA-1A Environmental: ENV-2024-6712-CE-1A Related Cases: ZA-2025-1386-CU1-HCA; ZA-2024-6711-CU1-HCA
Council District	4
Pending in Committee	Planning and Land Use Management Committee
Initiated by	Area Planning Commission (APC) / Central

Official source URL

<https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?cfnumber=26-1033&fa;=ccfi.viewrecord>

File Activities

Date	Activity
07/31/2026	California Environmental Quality Act (CEQA) Appeal submitted by Area Planning Commission (APC) / Central dated July 29, 2026.
07/31/2026	Area Planning Commission (APC) / Central document(s) referred to Planning and Land Use Management Committee.
07/29/2026	Document submitted by Area Planning Commission (APC) / Central, dated July 27, 2026.

Online Documents

Title	Doc Date
Attachment to Report dated 7-27-26 - Hillside Construction Management Plan (ZA-2024-6711)	07/27/2026
Attachment to Report dated 7-27-26 - Hillside Construction Management Plan (ZA-2025-1386)	07/27/2026
Attachment to Report dated 7-27-26 - Appeal	07/27/2026
Attachment to Report dated 7-27-26 - Categorical Exemption + Justification	07/27/2026
Attachment to Report dated 7-27-26 - Commission Packet (ZA-2024-6711)	07/27/2026
Attachment to Report dated 7-27-26 - Commission Packet (ZA-2025-1386)	07/27/2026
Attachment to Report dated 7-27-26 - ENV Application	07/27/2026
Attachment to Report dated 7-27-26 - Exhibit A (ZA-2024-6711)	07/27/2026
Attachment to Report dated 7-27-26 - Exhibit A (ZA-2025-1386)	07/27/2026

Title	Doc Date
Attachment to Report dated 7-27-26 - Findings (ZA-2024-6711)	07/27/2026
Attachment to Report dated 7-27-26 - Findings (ZA-2025-1386)	07/27/2026
Attachment to Report dated 7-27-26 - Grading and Soils Approval Letter	07/27/2026
Attachment to Report dated 7-27-26 - Mailing Labels (ZA-2024-6711)	07/27/2026
Attachment to Report dated 7-27-26 - Mailing Labels (ZA-2025-1386)	07/27/2026
Attachment to Report dated 7-27-26 - Modified Conditions of Approval (ZA-2024-6711)	07/27/2026
Attachment to Report dated 7-27-26 - Modified Conditions of Approval (ZA-2025-1386)	07/27/2026
Attachment to Report dated 7-27-26 - Tree Report	07/27/2026
Report from Central Los Angeles Area Planning Commission	07/27/2026

Council Vote Information

No votes were found.

Preservation note

This PDF preserves the content displayed on the official City of Los Angeles Council File Management System page identified above as of August 27, 2026. It is a preservation print prepared from the live public webpage content and is not a separately issued City Clerk PDF or certified record.

EXHIBIT B

Planning Department Transmittal Dated July 27, 2026 - Relevant Fields

Official source:

https://cityclerk.lacity.org/onlinedocs/2026/26-1033_misc_1_07-27-26.pdf

Relevant fields are faithfully transcribed from pages 1-3 of the official 41-page transmittal. The official PDF controls.

PLANNING DEPARTMENT TRANSMITTAL - CASE AND NOTICE FIELDS

City Planning Cases	ZA-2025-1386-CU1-HCA-1A; ZA-2024-6711-CU1-HCA-1A
Environmental Case	ENV-2024-6712-CE-1A
Project Address	2166 North Stanley Hills Drive and 2172 Stanley Hills Drive
Applicant	Rouzbeh Zarrinbakhsh, Stanley Family Residence, LLC
Applicant Representative	Sami Kohanim, Entitle and Permits
Appellant	Concerned Citizens of Stanley Hills Drive
Appellant Representative	Jamie T. Hall, Channel Law Group, LLP
Item for Council	ENV-2024-6712-CE-1A - CEQA Appeal
Entitlements Not Advancing	Class 1 Conditional Use Permit decisions
Council Notice Timing	24 days checked
Notice Publication	24 days checked
Notice List	Owner; Applicant; Neighborhood Council; Interested Parties; Appellant

The transmittal confirms that only the CEQA appeal advances to Council. The underlying Class 1 Conditional Use Permit decisions do not advance for a joint Council hearing.

PLANNING DEPARTMENT TRANSMITTAL - DEADLINE FIELDS

CAPC Hearing Date	April 14, 2026
Commission Vote	3-0
Last Day to Appeal	July 1, 2026
Date Appealed (as entered)	June 16, 2026
Council Time to Act	75 days checked
Time to Act Start	Appeal Filing Date checked
Received by Clerk	Unchecked
Last Day to Appeal Trigger	Unchecked
Transmitted By	Cecilia Lamas, Commission Executive Assistant II
Transmittal Date	July 27, 2026

Record reconciliation: The official appeal application was signed June 30 and accepted/receipted July 1. The CAPC Letter of Determination immediately following the transmittal identifies June 16 as its *mailing date*. Accordingly, the transmittal's June 16 "Date Appealed" entry is inconsistent with the actual filing record.

The transmittal also expressly leaves "Received by Clerk" unchecked, refuting any claim that Council's later internal receipt controls the deadline.

EXHIBIT C

Appellant's Signed CEQA Appeal Application

Official source:

https://cityclerk.lacity.org/onlinedocs/2026/26-1033_misc_2_07-27-26.pdf

The complete five-page application received from the City record follows. Pages 2-3 are especially material.

APPLICATIONS

APPEAL APPLICATION CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) Instructions and Checklist



RELATED CODE SECTIONS

The Los Angeles Municipal Code (LAMC) [Section 13B.11.F. of Chapter 1A](#) establishes the appeal procedure to the City Council for California Environmental Quality Act (CEQA) determinations.

PURPOSE

A CEQA determination can only be appealed if a non-elected, decision-making body (ZA, APC, CPC, DIR) makes a determination for a project that is not further appealable. If a final decision on a project was made by the City Council, either as the initial decisionmaker or on appeal, the related CEQA determination is not appealable.

To initiate appeal of a CEQA appeal, this form must be completed with the required materials attached and filed within 15 calendar days from the final administrative decision of the entitlement application.

GENERAL INFORMATION

Appealable CEQA determinations:

- Certified Environmental Impact Report (EIR)
- Sustainable Communities Environmental Assessment (SCEA)
- Mitigated Negative Declaration (MND)
- Negative Declaration (ND)
- Categorical Exemption (CE)
- Statutory Exemption (SE)
- Sustainable Communities Project Exemption (SCPE)

Non-appealable CEQA determinations:

- Addenda to any of the above-listed CEQA determinations
- Findings made pursuant to [CEQA Guidelines Section 15162](#)
- An action in which the determination does not constitute a project under CEQA

All CEQA appeals are heard by the City Council. This form is only for appeals related to determinations made by Los Angeles City Planning. All other CEQA appeals shall be filed with the City Clerk pursuant to [LAMC Section 197.01](#).

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council. Persons affiliated with a CNC may only file as an individual on behalf of self.

CASE INFORMATION

Environmental Case Number: ENV-2024-6712-EAF

Related Entitlement Case Number(s): ZA-2025-1386-CU1-HCA-1A; ZA-2024-6711-CU1-HCA-1A

Project Address: 2166 North Stanley Hills Drive and 2172 Stanley Hills Drive

Date of Final Entitlement Determination: June 16, 2026

The CEQA Clearance being appealed is a(n):

☐ EIR ☐ SCEA ☐ MND ☐ ND ☒ CE ☐ SE ☐ SCPE

JUSTIFICATION / REASON FOR APPEAL

Attach a separate sheet providing the specific reasons for the appeal. The reasons must state how CEQA was incorrectly applied, providing a legal basis for the appeal.

APPELLANT

Check all that apply.

☐ Representative ☐ Property Owner ☒ Other Person
☐ Applicant ☐ Operator of the Use/Site

APPELLANT INFORMATION

Appellant Name: Concerned Citizens of Stanley Hills Drive

Company/Organization: _____

Mailing Address: 2175 Stanley Hills Drive

City: Los Angeles **State:** CA **Zip Code:** 90046

Telephone: 323-377-6096 **Email:** randy@frontierservicesus.com

Is the appeal being filed on your behalf or on behalf of another party, organization, or company?

☒ **Self** ☐ **Other:** _____

Is the appeal being filed to support the original applicant's position? ☐ YES ☒ NO

REPRESENTATIVE / AGENT INFORMATION

Representative/Agent Name (if applicable): Jamie T. Hall

Company: Channel Law Group, LLP

Mailing Address: 8383 Wilshire Blvd., Suite 750

City: Beverly Hills **State:** CA **Zip Code:** 90211

Telephone: 310-982-1760 **Email:** jamie.hall@channellawgroup.com

APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true.

Appellant Signature:  **Date:** June 30, 2026

GENERAL NOTES

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.

The appellate body must act on the appeal within a time period specified in the LAMC Section(s) pertaining to the type of appeal being filed. Los Angeles City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.

THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: \$229 **Date :** 7/1/26

Reviewed & Accepted by (DSC Planner): Jason Chan

Receipt No.: 200642873442 **Date :** 7/1/26

Deemed Complete by (Project Planner): _____

ENVIRONMENTAL APPEAL FILING REQUIREMENTS

An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment. Appeals may be filed either online or in person as referenced below.

ONLINE APPEAL FILINGS THROUGH ONLINE APPLICATION SYSTEM (OAS)

Online Application System (OAS): The OAS (<https://planning.lacity.gov/oas>) allows entitlement appeals to be submitted entirely electronically by allowing an appellant to fill out and submit an appeal application online directly to City Planning's DSC, and submit fee payment by credit card or e-check.



QR Code to Online Appeal Filing

IN PERSON APPEAL FILINGS

Drop off at DSC: Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, as well as the South Los Angeles DSC on Tuesdays and Thursdays, and payment can be made by credit card or check.

- City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications.
- Alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

CITY PLANNING DEVELOPMENT SERVICES CENTERS – PUBLIC COUNTERS

Office	Address	Phone Number	Email
Metro DSC	201 N. Figueroa Street 4th Floor Los Angeles, CA 90012	(213) 482-7077	planning.figcounter@lacity.org
Van Nuys DSC	6262 Van Nuys Boulevard, Suite 251 Van Nuys, CA 91401	(818) 374-5050	planning.mbc2@lacity.org
South LA DSC <i>Tuesday and Thursday Only</i>	8475 S. Vermont Avenue, 1st Floor Los Angeles, CA 90044	(213) 978-1465	planning.southla@lacity.org

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

APPEAL DOCUMENTS

1. Hard Copy

Provide three sets (one original, two duplicates) of the listed documents for each appeal filed.

- ☒ Environmental Appeal Application
- ☒ Justification/Reason for Appeal
- ☒ Copies of the written Letter of Determination (LOD), from the final appellate body, which must be a non-elected decision-making body.

2. Electronic Copy

- ☒ Provide an electronic copy of the appeal documents on a USB flash drive. The following items must be saved as individual PDFs and labeled accordingly (e.g., "Appeal Form", "Justification/Reason Statement", or "Original Determination Letter"). No file should exceed 70 MB in size.

3. Appeal Fee

- ☐ *Original Applicant.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(a) (Appeal Fees) of Chapter 1, or LAMC Section 15.1.1F.1.a. (Appeal Fees) of Chapter 1A; or a fee equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.
- ☒ *Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(a) (Appeal Fees) of Chapter 1, or LAMC Section 15.1.1F.1.b. (Appeal Fees) of Chapter 1A.

Note: City Clerk prepares the mailing list for CEQA appeals per LAMC Section 13B.11.C. (Notice Rules for CEQA) of Chapter 1A.

EXHIBIT D

City Planning Email Requesting Applicant Signature on Extension - August 5, 2026

Source:

Council File record / Applicant correspondence

The original one-page email print follows in the form received by the Applicant.

From: Stacy Munoz stacy.munoz@lacity.org 
Subject: Appeal of ENV-2024-6712-CE-1A (Extension of Time)
Date: August 5, 2026 at 9:22 AM
To: Rouzbeh Zarrinbakhsh, ESQ. rouzbeh@ggclawfirm.com
Cc: Sami Kohanim entitleandpermits@gmail.com, Alan Como alan.como@lacity.org



Hi! Regarding the appeal for the above-mentioned case. I received word from the City Clerk's Office that there was insufficient time to adhere to the legal mailing requirements for the month of August. This case will now be scheduled for the month of September. Please sign and date the attached form and return it to me as soon as possible to ensure we meet the September deadline. I will forward it to the Clerk's Office as soon as I receive it. thx!



LOS ANGELES
CITY PLANNING

Stacy Muñoz

Pronouns: She, Her, Hers
Management Analyst

Los Angeles City Planning

200 N. Spring St., Room 763
Los Angeles, CA 90012

T: (213) 978-1354 | Planning4LA.org



*****Please note, I am out of the office every other Friday*****

**Extnsion of Time ENV-2024-
6712-CE-1A.pdf**



EXHIBIT E

Unsigned CP-1947 Extension of Time Request

Source:

Los Angeles City Planning CP-1947 [3.4.2025]

The original two-page form follows. Both signature sections are blank.

APPLICATIONS



EXTENSION OF TIME REQUEST

For City or Area Planning Commission Applications or Appeals

Related Code Sections

Pursuant to Los Angeles Municipal Code (LAMC) Section 13A.2.5.A.1. (Decision Time Period) and LAMC Section 13A.2.8.C.4. (Appeal Procedures) of Chapter 1A, decision makers and appellate bodies may extend the time to act by mutual agreement with the applicant.

This form is to be used to request an extension of the time limit to act for Area or City Planning Commission decisions on legislative and quasi-judicial land use applications and appeals. This request must be made before the matter is agendized. If notice of the hearing has been mailed, the applicant is responsible for the cost of mailing the cancellation and new hearing notice.

THIS SECTION TO BE COMPLETED BY APPLICANT

Project Information

Project Address: 2166 North Stanley Hills Drive and 2172 North Stanley Hills Drive

Case No.: ENV-2024-6712-CE

Related Case Nos.: ZA-2025-1386-CU1-HCA-1A; ZA-2024-6711-CU1-HCA-1A

Application Invoice No.:

Applicant(s): Stanley Family Residence LLC c/o Rouzbeh Zarrinbakshs

Representative: Sami Kohanim, Entitle and Permits

Request for Extension of Time Limit

The current time limit for the Commission to decide the subject case application/appeal will expire on: August 28, 2026. It is hereby requested to extend the time limit for the City Planning Commission to act for a period of _____ weeks, or until September 30, 2026.

Reason(s) for Request:

Insufficient time for the legal mailing requirements to be met. Extending the time to the month of September of 2026.

Signature: _____ **Date:** _____

Print Name: _____ **Email:** _____

THIS SECTION TO BE COMPLETED BY PLANNING STAFF

- ☒ Pursuant to LAMC Section 12.24, I.4
[applicable Code Section which permits extensions of time limits by mutual written consent of the applicant and decision-maker], and in accordance with the policy of the Area/City Planning Commission delegating authority to the Director of Planning to approve extensions of time limits on its behalf, the requested time extension is deemed routine in nature and will not prejudice the future decision by the Area/City Planning Commission on the merits of the subject application or appeal, and **therefore the requested time extension is granted until:**

September 30, 2026.

- ☐ Applicant to pay all Public Hearing Notice costs associated with a new Hearing or cancellation.

VINCENT P. BERTONI, AICP
Director of Planning

By Signature: _____ **Date:** _____

Print Name: _____ **Title:** _____

cc: Case File

EXHIBIT F

Official City Clerk Notice Scheduling September 22, 2026 PLUM Hearing

Official source:

https://cityclerk.lacity.org/onlinedocs/2026/26-1033_misc_08-28-26.pdf

The original two-page City Clerk notice follows.

PATRICE Y. LATTIMORE
CITY CLERK

RUBEN VIRAMONTES
EXECUTIVE OFFICER

City of Los Angeles CALIFORNIA



KAREN BASS
MAYOR

OFFICE OF THE
CITY CLERK

Council and Public Services Division
200 N. Spring Street, Room 395
Los Angeles, CA 90012
General Information - (213) 978-1133
FAX: (213) 978-1040

clerk.lacity.org

August 28, 2026

ENV-2024-6712-CE-1A
Council District 4

NOTICE TO APPLICANT(S), OWNER(S), APPELLANT(S), NEIGHBORHOOD COUNCIL, AND INTERESTED PARTIES

You are hereby notified that the Planning and Land Use Management (PLUM) Committee of the Los Angeles City Council will hold a public hearing in-person on **Tuesday, September 22, 2026** at approximately **2:00 P.M.**, or soon thereafter, in the John Ferraro Council Chamber, Room 340, City Hall, 200 North Spring Street, Los Angeles, CA 90012 (entrance on Main Street), to consider the following: Categorical Exemption from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Sections 15303, Class 3 and Section 15332, Class 32, and related CEQA findings; report from the Central Los Angeles Area Planning Commission (CLAAPC); and, an appeal filed by Concerned Citizens of Stanley Hills Drive (Representative: Jamie T. Hall, Channel Law Group, LLP), from the determination of the CLAAPC in approving a Categorical Exemption as the environmental clearance for a new two-story single-family dwelling with attached two-car garage, swimming pool, and spa, the proposed residence will contain approximately 2,338 square feet in floor area, consisting of 1,030 square feet on the first floor, 1,149 square feet on the second floor, and a 359 square-foot garage (200 square feet is exempt from floor area calculations), the proposed structure will be a maximum of 28 feet in height with a rooftop deck, site grading includes 437 cubic yards of cut and 322 cubic yards of fill, the Project includes the construction of two retaining walls up to 10 feet in height; for the properties located at 2166 North Stanley Hills Drive and 2172 Stanley Hills Drive.

Applicant: Rouzbeh Zarrinbakhsh, Stanley Family Residence, LLC
Representative: Sami Kohanim, Entitle and Permits
Case Nos. ZA-2025-1386-CU1-HCA-1A; ZA-2024-6711-CU1-HCA-1A
Related Cases: ZA-2025-1386-CU1-HCA; ZA-2024-6711-CU1-HCA

Note that pursuant to Los Angeles Municipal Code Chapter 1A, Section 13B.11.1.F.8, all California Environmental Quality Act (CEQA) appeal related documents filed by or on behalf of the appellant must be filed with the City Clerk no later than 5 business days prior to the date set for the hearing. CEQA appeal-related documents filed by any party other than the appellant (or the appellant's representatives) must be filed with the City Clerk no later than 2 business days prior to the date of the hearing. Documents submitted after these deadlines will be marked late and shall not be considered by the City Council in its review and decision on the CEQA appeal.

AN EQUAL OPPORTUNITY EMPLOYER

The audio for this meeting is broadcast live on the internet at: <https://clerk.lacity.org/calendar>.

Requests for reasonable modification or accommodation from individuals with disabilities, consistent with the Americans with Disabilities Act can be made by contacting the City Clerk's Office at (213) 978-1133. For Telecommunication Relay Services for the hearing impaired, please visit this site for information: <https://www.fcc.gov/consumers/guide/telecommunications-relay-services-trs>.

If you are unable to appear at this meeting, you may submit your comments in writing. Written comments may be addressed to the City Clerk, Room 395, City Hall, 200 North Spring Street, Los Angeles, CA 90012, or submitted through the Public Comment Portal: www.LACouncilComment.com.

In addition, you may view the contents of Council file No. **26-1033** by visiting: www.lacouncilfile.com.

Please be advised that the Planning and Land Use Management Committee reserves the right to continue this matter to a later date, subject to any time limit constraints.

For inquiries about the project, contact City Planning staff:

Jordann Turner

(213) 978-1318

jordann.turner@lacity.org

Alan Como

(213) 978-1318

alan.como@lacity.org

For inquiries about the meeting, contact City Clerk staff:

Candy Rosales

(213) 978-1078

clerk.plumcommittee@lacity.org

Note: If you challenge this proposed action in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the City Clerk at, or prior to, the public hearing. Any written correspondence delivered to the City Clerk before the City Council's final action on a matter will become a part of the administrative record. The time in which you may seek judicial review of any final action by the City Council is limited by California Code of Civil Procedure Section 1094.6 which provides that an action pursuant to Code of Civil Procedure Section 1094.5 challenging the Council's action must be filed no later than the 90th day following the date on which the Council action becomes final.

EXHIBIT G

Current Los Angeles Zoning Code - CEQA Appeal Deadline and Extension Provisions

Official source:

<https://zoning.lacity.gov/browse/13B>

Official-source excerpts are reproduced for convenience. The current official Zoning Code controls.

CURRENT CODE EXCERPTS

LAMC section 13B.11.1.F.7(a) - City Council time to act on CEOA appeal

The City Council shall act within 75 days after expiration of the appeal period. The 75-day time limit may be extended by mutual written consent of the applicant and the City Council. If the City Council fails to act within the time limit, the failure constitutes denial of the appeal.

LAMC section 13A.2.8.F.2 - general appellate decision rule

The appellate body must act within the prescribed time. Failure of the appellate body to render a timely decision results in denial of the appeal.

LAMC section 13A.2.2.B.3 - extensions generally

Unless a specific process provides otherwise, a time limit may be extended only when mutually agreed upon in writing by the applicant and the decision-making official or agency.

Application here: The appeal period ended July 1, 2026. Seventy-five days later is September 14, 2026. A later internal transmittal or receipt date is not identified as a trigger, and no mutual written Applicant consent was executed.

[Official Article 13 browse page](#)

[Official Part 13B browse page](#)

These excerpts are faithful summaries of the current official online code and are included to direct the City to the controlling provisions; the official text controls.

EXHIBIT H

City Clerk Memorandum to File - Council File 24-1418

Official source:

https://cityclerk.lacity.org/onlinedocs/2024/24-1418_misc_1-22-25.pdf

The following is a faithful transcription of the official one-page memorandum dated January 22, 2025.

OFFICE OF THE CITY CLERK
COUNCIL AND PUBLIC SERVICES DIVISION**Council File No. 24-1418**

January 22, 2025

MEMORANDUM TO FILE

The purpose of this memorandum is to note for the record, with regard to City Planning Case No.

CPC-2022-3867-DB-MCUP-SPR-WDI-HCA and Environmental Case No. ENV-2022-3868-SCEA, pertaining to the properties located at 6626 West Hollywood Boulevard, 6626-6636 West Hollywood Boulevard, and 1638-1644 North Cherokee Avenue, the City Council failed to act within the prescribed time limit. As specified in Los Angeles Municipal Code Section 13A.2.8.F.2, failure of the appellate body to render a timely decision shall result in the denial of the appeal.

Candy Rosales
Deputy City Clerk

Faithful transcription for convenience. The official City Clerk PDF at the source link controls.

EXHIBIT I

City Planning Extension Request - Council File 25-1476

Official source:

https://cityclerk.lacity.org/online/docs/2025/25-1476_rpt_dcp_12-16-25.pdf

The following reproduces the material timing language from City Planning's official December 16, 2025 letter.

DEPARTMENT OF CITY PLANNING

December 16, 2025

Los Angeles City Council
Office of the City Clerk
Attention: PLUM Committee

Re: Request for Extension of Time to Act on CEQA Appeal - Council File 25-1476

Pursuant to Los Angeles Municipal Code Chapter 1A, Section 13B.11.1.F.7, the City Council is required to act on an appeal of a CEQA determination within 75 days of the filing of the appeal, unless the time is extended. The appeal was filed on November 13, 2025, resulting in an original deadline for City Council action of January 27, 2026.

To allow sufficient time for scheduling and consideration of the appeal, the Department of City Planning requested an extension to March 25, 2026.

Relevance: City Planning treated the appeal filing as the operative event and requested an extension for scheduling rather than treating later internal transmittal as restarting the clock.

Faithful material transcription for convenience. The official City Planning letter at the source link controls.

EXHIBIT J

Channel Law Group Prior Deadline Position - Council File 25-1518

Official source:

https://cityclerk.lacity.org/onlinedocs/2025/25-1518_misc_03-31-26.pdf

This exhibit summarizes the March 31, 2026 submission by Appellant's counsel in another Council CEQA appeal. It is offered for consistency, not as judicial estoppel.

SOURCE SUMMARY AND LIMITED EXCERPTS

In Council File 25-1518, Channel Law Group argued to the City Council and City Attorney that the 75-day CEQA appeal deadline had expired, that timely mutual written applicant consent was required, and that a later Council signature could not retroactively restore the administrative appeal.

Limited excerpts from the official submission:

"the appeal was deemed denied by operation of law"
"timely, mutual written consent"
a later signature "cannot retroactively resuscitate a lapsed timeline"

The Applicant Parties do not contend that this creates judicial estoppel or a binding admission. The prior submission is relevant because it demonstrates that the deadline interpretation requested here is neither novel nor opportunistic; it is the same interpretation Appellant's counsel urged the City to enforce for another client.

The official March 31, 2026 submission at the source link controls.

Communication from Public

Name: Entitle and Permits
Date Submitted: 08/28/2026 02:12 PM
Council File No: 26-1033
Comments for Public Posting: Applicant's Notice of Non-Consent to Extension; Deadline Objection; Request for Deemed Denial; and Notice of Intent to Seek Writ Relief

ENTITLE AND PERMITS

18375 Ventura Blvd., Suite 120, Tarzana, CA 91356 | Office: (310) 571-5833 | Mobile: (310) 488-1369
entitleandpermits@gmail.com | www.EntitleandPermits.com

VIA PUBLIC COMMENT PORTAL AND EMAIL - PRE-LITIGATION NOTICE

August 28, 2026

TO: Office of the City Clerk; Planning and Land Use Management Committee; Los Angeles City Council; Department of City Planning; Council District 4

IMMEDIATE ROUTING REQUEST - CITY ATTORNEY

- Place this complete letter and every exhibit in Council File 26-1033 immediately.
- Immediately transmit the complete packet to the Office of the City Attorney, including the attorney assigned to land-use and CEQA matters, before any further action on the appeal.
- Confirm by email to entitleandpermits@gmail.com that the packet was uploaded and delivered to the City Attorney.

Council File	26-1033
Environmental Case	ENV-2024-6712-CE-1A
Entitlement Cases	ZA-2025-1386-CU1-HCA-1A; ZA-2024-6711-CU1-HCA-1A
Project	2166 and 2172 North Stanley Hills Drive
Applicant of Record	Stanley Family Residence, LLC
Applicant Representative	Sam Kohanim, Entitle and Permits (identified as "Sami Kohanim" in City records)
Appellant	Concerned Citizens of Stanley Hills Drive

NOTICE OF NON-CONSENT; OBJECTION TO THE UNTIMELY SEPTEMBER 22, 2026 HEARING; DEMAND FOR RECOGNITION OF DEEMED DENIAL; NOTICE OF INTENT TO SEEK WRIT RELIEF; AND RECORD-PRESERVATION DEMAND

Entitle and Permits, through Sam Kohanim, submits this notice as the City-recognized project representative on behalf of **Stanley Family Residence, LLC** and **Rouzbeh Zarrinbakhsh** (collectively, the "Applicant Parties"). The record establishes that the September 22 PLUM hearing is outside the City Council's time to act unless the City can produce a valid, timely, mutually executed written extension. No such extension was signed or authorized by the Applicant Parties.

The City's reported internal delay does not change that conclusion. On August 28, City Council staff told Mr. Kohanim that the Council side received the file late from Planning, on or about July 30. An internal handoff between City departments cannot enlarge a statutory deadline, cannot be charged to the Applicant Parties, and cannot substitute for the Applicant's required written consent.

The Council File itself displays August 28 and August 30 as the time-limit entries. Independently, even correcting the apparent June 16 transmittal error and using the latest date supported by the actual filing record - July 1, 2026 - the 75-day period ends on **September 14, 2026**. The scheduled September 22 committee hearing is therefore untimely under either calculation, and final Council action would occur still later.

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entitleandpermits@gmail.com | www.EntitleandPermits.com

RELIEF REQUESTED

- Acknowledge immediately that no applicant extension exists and none is consented to.
- Produce any document the City contends extended the deadline, including the complete executed writing and proof of each signatory's authority.
- Upon expiration of the applicable unextended deadline, place a City Clerk memorandum in Council File 26-1033 confirming that the CEQA appeal is denied and the underlying determinations stand.
- Do not proceed with the September 22 hearing absent a valid, timely extension.

I. RELEVANT RECORD AND CORRECTED TIMELINE

The record contains an obvious date discrepancy. The Planning transmittal lists June 16 as the "Date Appealed," but June 16 is the mailing date of the CAPC Letters of Determination. The appellant did not sign the appeal until June 30, and City Planning did not review, accept, and receipt the appeal until July 1. The City's own form also identifies July 1 as the last day to appeal. The documentary sequence is set out below.

Date	Record Event
June 16, 2026	CAPC Letters of Determination mailed. The appeal form identifies June 16 as the final entitlement determination date - not the appeal filing date.
June 30, 2026	Appellant signs the CEQA appeal application.
July 1, 2026	City Planning reviews and accepts the appeal, issues the fee receipt, and the 15-day appeal period expires.
July 27, 2026	Planning dates its transmittal to the City Clerk.
July 29-31, 2026	Council File is received/introduced and the appeal materials are referred to PLUM.
August 5, 2026	Planning states that the Clerk reported insufficient time for August legal mailing and asks Applicant to sign an extension through September 30.
August 28, 2026	The Council File still displays August 28/August 30 time-limit entries and posts a notice for a September 22 PLUM hearing.
September 14, 2026	Latest independently supportable 75-day deadline: 75 days after the July 1 expiration of the appeal period.
September 22, 2026	Scheduled PLUM hearing - eight days after September 14, before any later final Council action.

The July 1 date is not a concession that the City's displayed August deadlines are incorrect. The Applicant Parties expressly preserve the position that the City is bound by its own published time-limit entries. July 1 is used as the *latest independently supportable trigger* to demonstrate that the September 22 hearing is untimely even after resolving the City's apparent June 16 clerical error in the City's favor.

II. THE CURRENT CODE REQUIRES ACTION WITHIN 75 DAYS AND REQUIRES MUTUAL WRITTEN CONSENT FOR ANY EXTENSION

LAMC section 13B.11.1.F.7(a) provides that the City Council shall act on a CEQA appeal within 75 days after expiration of the appeal period. It further provides that the time may be extended only by **mutual written consent of the applicant and the City Council**, and that failure to act within the time limit constitutes denial of the appeal. The City's general appeal rule, LAMC section 13A.2.8.F.2, likewise states that failure to render a timely decision results in denial of the appeal.

The appeal period expired July 1. Seventy-five days later is Monday, September 14, 2026. The September 22 PLUM hearing falls eight days after that date. PLUM is an intermediate committee; it is not final action by the City Council. Thus, the scheduled hearing cannot satisfy the time limit even if the City were to treat July 1 as the operative date.

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The City's own administrative materials are even more restrictive. The Council File displays August 28 and August 30 as the "Time Limit Last Day To Act" entries. The Planning transmittal selects "Appeal Filing Date" and leaves "Received by Clerk" unchecked. Under no version of the City's own record is Council's later internal receipt on July 29 or July 30 the trigger.

III. THE CITY'S LATE INTERNAL TRANSMISSION DOES NOT TOLL OR RESTART THE DEADLINE

The City's August 28 telephone explanation confirms an internal processing delay: Council staff stated that the file was received late from Planning, on or about July 30. That explanation does not create legal additional time. The deadline is fixed by the Code and may be extended only through the Applicant's written consent. No provision identified by the City allows a department to restart the period by delaying its internal transmittal.

The record shows that the appeal was accepted and paid on July 1, but Planning did not date its transmittal until July 27 and the Council File was not received/introduced until July 29. That 28-day routing interval was entirely within the City. The Applicant Parties neither caused nor agreed to it. A City-created transmission delay cannot become an extension that the Applicant expressly declined to sign.

If the City contends otherwise, it should identify the precise Code provision that makes the Clerk's internal receipt date controlling despite (1) the current CEQA appeal provision, (2) the City's own transmittal selection, and (3) the requirement of mutual written consent.

IV. THE CITY REQUESTED AN EXTENSION BECAUSE IT KNEW THE SEPTEMBER SCHEDULE REQUIRED APPLICANT CONSENT - AND APPLICANT DID NOT CONSENT

On August 5, Planning advised that the Clerk's Office reported insufficient time to satisfy the legal mailing requirements for an August hearing. Planning therefore asked the Applicant to sign and return an extension form so the matter could be heard in September. The form identifies August 28 as the current deadline, seeks an extension to September 30, and states that the extension is based on mutual written consent.

Neither the Applicant signature line nor the Planning approval line is signed. Rouzbeh Zarrinbakhsh did not sign, return, orally accept, or otherwise agree to the extension. Sam Kohanim and Entitle and Permits did not consent and were not authorized to consent. The Applicant Parties expressly withhold consent to any extension, including any attempted retroactive extension.

As a matter of fact, on August 12, 2026, the applicant sent a written rejection to the Planning, Stacy Munoz, advising her that the extension is not granted and the applicant cannot appear after the 75-day deadline. If the City contends that any authorized person consented, it must immediately produce the signed consent form.

V. THE AUGUST 28 NOTICE DOES NOT CURE THE DECISION DEADLINE; IT CONFIRMS THE PROBLEM

The August 28 notice provides advance notice of a September 22 hearing. The Applicant Parties are not presently asserting that the notice interval itself is fewer than 24 days. The dispositive problem is separate: notice issued on August 28 could not produce a hearing, much less final Council action, by September 14. The notice therefore does not cure the time-to-act problem; it demonstrates why Planning asked for an extension on August 5.

The notice also states that any continuance is subject to time-limit constraints. That reservation should be applied now. Unless a valid extension is produced, the matter cannot lawfully remain pending for a September 22 merits hearing after the appeal has been denied by operation of the Code.

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VI. THE CITY'S OWN FORM, PRIOR PRACTICE, AND APPELLANT'S COUNSEL'S PRIOR POSITION CONFIRM THE SAME RESULT

The CEQA appeal application signed by Appellant's counsel states that if the appellate body cannot hear and consider an appeal before the last day to act, the appeal is automatically deemed **denied** and the original decision stands. It also states that the last day may be extended only if formally agreed upon by the applicant.

The City Clerk has applied the same rule in another Council-level CEQA appeal. In Council File 24-1418, the Clerk filed a memorandum stating that Council failed to act within the prescribed time and, under LAMC section 13A.2.8.F.2, the appeal was denied. City Planning likewise stated in Council File 25-1476 that an appeal filed November 13 produced a January 27 deadline - 75 days later - confirming that later internal routing does not restart the clock.

Appellant's counsel, Channel Law Group, recently urged the same interpretation in Council File 25-1518: the appeal was "deemed denied by operation of law," timely "mutual written consent" was required, and a late signature could not revive the timeline. This prior position is not offered as judicial estoppel. It confirms that the interpretation requested here is the same procedural rule Appellant's counsel asked the City to enforce for another client.

VII. DEMAND FOR ACTION, CITY ATTORNEY REVIEW, AND PRESERVATION OF RECORDS

1. **Upload.** Place this letter and all exhibits in Council File 26-1033 immediately and without alteration.
2. **City Attorney.** Immediately transmit the complete packet to the Office of the City Attorney, including assigned land-use/CEQA counsel, and confirm the transmission in writing.
3. **Non-consent.** Confirm that the Applicant Parties have not consented and do not consent to extending the City Council's time to act.
4. **Produce any alleged extension.** Within two business days, identify and produce every writing or communication the City contends constitutes an extension, together with execution dates and authority of each signatory.
5. **Deemed denial.** If no valid timely extension exists and no timely final Council decision occurs, file a City Clerk memorandum no later than the first business day after the applicable deadline confirming that the CEQA appeal is denied and the underlying determinations stand.
6. **September 22 hearing.** Remove the matter from the September 22 calendar after expiration of the unextended deadline, or provide a written legal explanation approved by the City Attorney for proceeding.
7. **Status.** Confirm in writing the resulting administrative status and the status of any appeal-related holds. This filing does not request authorization to commence work without otherwise required permits and clearances.
8. **Preservation.** Preserve all paper and electronic records concerning appeal filing, acceptance, transmittal, receipt, routing, notice, publication, scheduling, extension, consent, and the August 28 telephone explanation, including emails, texts, internal messages, drafts, routing slips, calendar entries, notes, metadata, and communications among Planning, the Clerk, PLUM, Council offices, the City Attorney, the Applicant Parties, and Appellant or counsel.

VIII. NOTICE OF INTENT TO SEEK WRIT AND INJUNCTIVE RELIEF

Formal notice: If no valid, timely, mutually executed written extension exists and the City does not provide and post written confirmation of deemed denial by **5:00 p.m. on September 15, 2026** - the first business day after the latest independently supportable September 14 deadline - or if the City proceeds with the September 22 hearing despite expiration of the deadline, the Applicant Parties will, through counsel, promptly file a petition for writ of mandate and/or prohibition and seek declaratory and injunctive relief, including temporary relief as necessary, without further notice. This packet is intended as pre-litigation notice and should be delivered to the City Attorney immediately.

ENTITLE AND PERMITS

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entitleandpermits@gmail.com | www.EntitleandPermits.com

IX. CONTINUING OBJECTION AND NON-WAIVER

Any later written submission or appearance concerning the CEQA merits will be made under continuing objection and solely to preserve alternative defenses. Nothing in such participation will constitute consent to an extension, waiver of deemed denial, or agreement that the City retains authority to decide the appeal after the deadline.

Respectfully submitted,

/s/ Sam Kohanim

Sam Kohanim

Authorized Project Representative

ENTITLE AND PERMITS

For Stanley Family Residence, LLC and Rouzbeh Zarrinbakhsh

/s/ Rouzbeh Zarrinbakhsh

Rouzbeh Zarrinbakhsh

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INDEX OF EXHIBITS

Exhibit	Description
A	Official Council File 26-1033 docket excerpt updated August 28, 2026, plus August 27 preservation snapshot
B	Planning Department transmittal dated July 27, 2026 - relevant case, notice, and time-limit fields
C	Appellant's signed CEQA appeal application, including June 16 determination date, June 30 signature, July 1 acceptance/receipt, and automatic-denial General Notes
D	City Planning email dated August 5, 2026 requesting Applicant signature on an extension because August legal mailing could not be completed
E	Unsigned CP-1947 Extension of Time Request identifying August 28 as current deadline and September 30 as requested deadline
F	Official City Clerk notice dated August 28, 2026 scheduling the September 22 PLUM hearing
G	Current Los Angeles Zoning Code deadline and extension provisions - official-source excerpts
H	City Clerk Memorandum to File in Council File 24-1418 applying deemed denial for failure to act timely
I	City Planning letter in Council File 25-1476 calculating 75 days from appeal filing and requesting extension
J	Channel Law Group's March 31, 2026 deadline position in Council File 25-1518 - source summary and limited excerpts

Source convention: Exhibits A, B, G, H, I, and J include faithful transcriptions or concise source summaries prepared from the cited official City records because the full controlling documents are publicly available at the stated City URLs. Exhibits C-F and the August 27 docket snapshot are appended in their original received/filed form. The official City records control.

EXHIBIT A

Official Council File 26-1033 Docket - Updated Excerpt and Preservation Snapshot

Official source:

<https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?cfnumber=26-1033&fa;=ccfi.viewrecord>

The following updated excerpt reflects the live public docket as accessed August 28, 2026. The original August 27 preservation snapshot follows in its filed form.

OFFICIAL COUNCIL FILE 26-1033 - UPDATED DOCKET EXCERPT

Title	2166 North Stanley Hills Drive / 2172 Stanley Hills Drive / CEQA / Appeal
Date Received / Introduced	07/29/2026
Last Changed	08/28/2026
Time Limit Last Day To Act	08/30/2026; 08/28/2026 - Los Angeles Municipal Code
Pending in Committee	Planning and Land Use Management Committee
08/28/2026 Activity	PLUM scheduled the item for committee meeting on September 22, 2026.
Council Vote Information	No votes found.

Material observation: The docket posts a September 22 committee hearing while continuing to display August 28/August 30 time-limit entries and no Council vote or posted executed extension.

[Open the live official Council File](#)

This page is a faithful convenience reproduction prepared from the official public docket. The official live record controls.

CITY OF LOS ANGELES

Office of the City Clerk - Council File Management System

Preservation snapshot of the official Council File webpage
Captured from the live public record on August 27, 2026

Council File: 26-1033

Title	2166 North Stanley Hills Drive / 2172 Stanley Hills Drive / California Environmental Quality Act (CEQA) / Appeal
Date Received / Introduced	07/29/2026
Last Changed Date	07/31/2026
Expiration Date	07/29/2028
Time Limit Last Day To Act Pursuant To	08/30/2026 08/28/2026 Los Angeles Municipal Code
Reference Numbers	Cases: ZA-2025-1386-CU1-HCA-1A; ZA-2024-6711-CU1-HCA-1A Environmental: ENV-2024-6712-CE-1A Related Cases: ZA-2025-1386-CU1-HCA; ZA-2024-6711-CU1-HCA
Council District	4
Pending in Committee	Planning and Land Use Management Committee
Initiated by	Area Planning Commission (APC) / Central

Official source URL

<https://cityclerk.lacity.org/lacityclerkconnect/index.cfm?cfnumber=26-1033&fa;=ccfi.viewrecord>

File Activities

Date	Activity
07/31/2026	California Environmental Quality Act (CEQA) Appeal submitted by Area Planning Commission (APC) / Central dated July 29, 2026.
07/31/2026	Area Planning Commission (APC) / Central document(s) referred to Planning and Land Use Management Committee.
07/29/2026	Document submitted by Area Planning Commission (APC) / Central, dated July 27, 2026.

Online Documents

Title	Doc Date
Attachment to Report dated 7-27-26 - Hillside Construction Management Plan (ZA-2024-6711)	07/27/2026
Attachment to Report dated 7-27-26 - Hillside Construction Management Plan (ZA-2025-1386)	07/27/2026
Attachment to Report dated 7-27-26 - Appeal	07/27/2026
Attachment to Report dated 7-27-26 - Categorical Exemption + Justification	07/27/2026
Attachment to Report dated 7-27-26 - Commission Packet (ZA-2024-6711)	07/27/2026
Attachment to Report dated 7-27-26 - Commission Packet (ZA-2025-1386)	07/27/2026
Attachment to Report dated 7-27-26 - ENV Application	07/27/2026
Attachment to Report dated 7-27-26 - Exhibit A (ZA-2024-6711)	07/27/2026
Attachment to Report dated 7-27-26 - Exhibit A (ZA-2025-1386)	07/27/2026

Title	Doc Date
Attachment to Report dated 7-27-26 - Findings (ZA-2024-6711)	07/27/2026
Attachment to Report dated 7-27-26 - Findings (ZA-2025-1386)	07/27/2026
Attachment to Report dated 7-27-26 - Grading and Soils Approval Letter	07/27/2026
Attachment to Report dated 7-27-26 - Mailing Labels (ZA-2024-6711)	07/27/2026
Attachment to Report dated 7-27-26 - Mailing Labels (ZA-2025-1386)	07/27/2026
Attachment to Report dated 7-27-26 - Modified Conditions of Approval (ZA-2024-6711)	07/27/2026
Attachment to Report dated 7-27-26 - Modified Conditions of Approval (ZA-2025-1386)	07/27/2026
Attachment to Report dated 7-27-26 - Tree Report	07/27/2026
Report from Central Los Angeles Area Planning Commission	07/27/2026

Council Vote Information

No votes were found.

Preservation note

This PDF preserves the content displayed on the official City of Los Angeles Council File Management System page identified above as of August 27, 2026. It is a preservation print prepared from the live public webpage content and is not a separately issued City Clerk PDF or certified record.

EXHIBIT B

Planning Department Transmittal Dated July 27, 2026 - Relevant Fields

Official source:

https://cityclerk.lacity.org/onlinedocs/2026/26-1033_misc_1_07-27-26.pdf

Relevant fields are faithfully transcribed from pages 1-3 of the official 41-page transmittal. The official PDF controls.

PLANNING DEPARTMENT TRANSMITTAL - CASE AND NOTICE FIELDS

City Planning Cases	ZA-2025-1386-CU1-HCA-1A; ZA-2024-6711-CU1-HCA-1A
Environmental Case	ENV-2024-6712-CE-1A
Project Address	2166 North Stanley Hills Drive and 2172 Stanley Hills Drive
Applicant	Rouzbeh Zarrinbakhsh, Stanley Family Residence, LLC
Applicant Representative	Sami Kohanim, Entitle and Permits
Appellant	Concerned Citizens of Stanley Hills Drive
Appellant Representative	Jamie T. Hall, Channel Law Group, LLP
Item for Council	ENV-2024-6712-CE-1A - CEQA Appeal
Entitlements Not Advancing	Class 1 Conditional Use Permit decisions
Council Notice Timing	24 days checked
Notice Publication	24 days checked
Notice List	Owner; Applicant; Neighborhood Council; Interested Parties; Appellant

The transmittal confirms that only the CEQA appeal advances to Council. The underlying Class 1 Conditional Use Permit decisions do not advance for a joint Council hearing.

PLANNING DEPARTMENT TRANSMITTAL - DEADLINE FIELDS

CAPC Hearing Date	April 14, 2026
Commission Vote	3-0
Last Day to Appeal	July 1, 2026
Date Appealed (as entered)	June 16, 2026
Council Time to Act	75 days checked
Time to Act Start	Appeal Filing Date checked
Received by Clerk	Unchecked
Last Day to Appeal Trigger	Unchecked
Transmitted By	Cecilia Lamas, Commission Executive Assistant II
Transmittal Date	July 27, 2026

Record reconciliation: The official appeal application was signed June 30 and accepted/receipted July 1. The CAPC Letter of Determination immediately following the transmittal identifies June 16 as its *mailing date*. Accordingly, the transmittal's June 16 "Date Appealed" entry is inconsistent with the actual filing record.

The transmittal also expressly leaves "Received by Clerk" unchecked, refuting any claim that Council's later internal receipt controls the deadline.

EXHIBIT C

Appellant's Signed CEQA Appeal Application

Official source:

https://cityclerk.lacity.org/online/docs/2026/26-1033_misc_2_07-27-26.pdf

The complete five-page application received from the City record follows. Pages 2-3 are especially material.

APPLICATIONS

APPEAL APPLICATION CALIFORNIA ENVIRONMENTAL QUALITY ACT (CEQA) Instructions and Checklist



RELATED CODE SECTIONS

The Los Angeles Municipal Code (LAMC) [Section 13B.11.F. of Chapter 1A](#) establishes the appeal procedure to the City Council for California Environmental Quality Act (CEQA) determinations.

PURPOSE

A CEQA determination can only be appealed if a non-elected, decision-making body (ZA, APC, CPC, DIR) makes a determination for a project that is not further appealable. If a final decision on a project was made by the City Council, either as the initial decisionmaker or on appeal, the related CEQA determination is not appealable.

To initiate appeal of a CEQA appeal, this form must be completed with the required materials attached and filed within 15 calendar days from the final administrative decision of the entitlement application.

GENERAL INFORMATION

Appealable CEQA determinations:

- Certified Environmental Impact Report (EIR)
- Sustainable Communities Environmental Assessment (SCEA)
- Mitigated Negative Declaration (MND)
- Negative Declaration (ND)
- Categorical Exemption (CE)
- Statutory Exemption (SE)
- Sustainable Communities Project Exemption (SCPE)

Non-appealable CEQA determinations:

- Addenda to any of the above-listed CEQA determinations
- Findings made pursuant to [CEQA Guidelines Section 15162](#)
- An action in which the determination does not constitute a project under CEQA

All CEQA appeals are heard by the City Council. This form is only for appeals related to determinations made by Los Angeles City Planning. All other CEQA appeals shall be filed with the City Clerk pursuant to [LAMC Section 197.01](#).

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council. Persons affiliated with a CNC may only file as an individual on behalf of self.

CASE INFORMATION

Environmental Case Number: ENV-2024-6712-EAF

Related Entitlement Case Number(s): ZA-2025-1386-CU1-HCA-1A; ZA-2024-6711-CU1-HCA-1A

Project Address: 2166 North Stanley Hills Drive and 2172 Stanley Hills Drive

Date of Final Entitlement Determination: June 16, 2026

The CEQA Clearance being appealed is a(n):

☐ EIR ☐ SCEA ☐ MND ☐ ND ☒ CE ☐ SE ☐ SCPE

JUSTIFICATION / REASON FOR APPEAL

Attach a separate sheet providing the specific reasons for the appeal. The reasons must state how CEQA was incorrectly applied, providing a legal basis for the appeal.

APPELLANT

Check all that apply.

☐ Representative ☐ Property Owner ☒ Other Person
☐ Applicant ☐ Operator of the Use/Site

APPELLANT INFORMATION

Appellant Name: Concerned Citizens of Stanley Hills Drive

Company/Organization: _____

Mailing Address: 2175 Stanley Hills Drive

City: Los Angeles **State:** CA **Zip Code:** 90046

Telephone: 323-377-6096 **Email:** randy@frontierservicesus.com

Is the appeal being filed on your behalf or on behalf of another party, organization, or company?

☒ **Self** ☐ **Other:** _____

Is the appeal being filed to support the original applicant's position? ☐ YES ☒ NO

REPRESENTATIVE / AGENT INFORMATION

Representative/Agent Name (if applicable): Jamie T. Hall
Company: Channel Law Group, LLP
Mailing Address: 8383 Wilshire Blvd., Suite 750
City: Beverly Hills **State:** CA **Zip Code:** 90211
Telephone: 310-982-1760 **Email:** jamie.hall@channellawgroup.com

APPLICANT'S AFFIDAVIT

I certify that the statements contained in this application are complete and true.

Appellant Signature:  **Date:** June 30, 2026

GENERAL NOTES

A Certified Neighborhood Council (CNC) or a person identified as a member of a CNC or as representing the CNC may not file an appeal on behalf of the Neighborhood Council; persons affiliated with a CNC may only file as an individual on behalf of self.

The appellate body must act on the appeal within a time period specified in the LAMC Section(s) pertaining to the type of appeal being filed. Los Angeles City Planning will make its best efforts to have appeals scheduled prior to the appellate body's last day to act in order to provide due process to the appellant. If the appellate body is unable to come to a consensus or is unable to hear and consider the appeal prior to the last day to act, the appeal is automatically deemed denied, and the original decision will stand. The last day to act as defined in the LAMC may only be extended if formally agreed upon by the applicant.

THIS SECTION FOR CITY PLANNING STAFF USE ONLY

Base Fee: \$229 **Date :** 7/1/26
Reviewed & Accepted by (DSC Planner): Jason Chan
Receipt No.: 200642873442 **Date :** 7/1/26
Deemed Complete by (Project Planner): _____

ENVIRONMENTAL APPEAL FILING REQUIREMENTS

An appeal application must be submitted and paid for before 4:30 PM (PST) on the final day to appeal the determination. Should the final day fall on a weekend or legal City holiday, the time for filing an appeal shall be extended to 4:30 PM (PST) on the next succeeding working day. Appeals should be filed early to ensure the Development Services Center (DSC) staff has adequate time to review and accept the documents, and to allow appellants time to submit payment. Appeals may be filed either online or in person as referenced below.

ONLINE APPEAL FILINGS THROUGH ONLINE APPLICATION SYSTEM (OAS)

Online Application System (OAS): The OAS (<https://planning.lacity.gov/oas>) allows entitlement appeals to be submitted entirely electronically by allowing an appellant to fill out and submit an appeal application online directly to City Planning's DSC, and submit fee payment by credit card or e-check.



QR Code to Online Appeal Filing

IN PERSON APPEAL FILINGS

Drop off at DSC: Appeals of this determination can be submitted in-person at the Metro or Van Nuys DSC locations, as well as the South Los Angeles DSC on Tuesdays and Thursdays, and payment can be made by credit card or check.

- City Planning has established drop-off areas at the DSCs with physical boxes where appellants can drop off appeal applications.
- Alternatively, appeal applications can be filed with staff at DSC public counters. Appeal applications must be on the prescribed forms, and accompanied by the required fee and a copy of the determination letter. Appeal applications shall be received by the DSC public counter and paid for on or before the above date or the appeal will not be accepted.

CITY PLANNING DEVELOPMENT SERVICES CENTERS – PUBLIC COUNTERS

Office	Address	Phone Number	Email
Metro DSC	201 N. Figueroa Street 4th Floor Los Angeles, CA 90012	(213) 482-7077	planning.figcounter@lacity.org
Van Nuys DSC	6262 Van Nuys Boulevard, Suite 251 Van Nuys, CA 91401	(818) 374-5050	planning.mbc2@lacity.org
South LA DSC <i>Tuesday and Thursday Only</i>	8475 S. Vermont Avenue, 1st Floor Los Angeles, CA 90044	(213) 978-1465	planning.southla@lacity.org

City Planning staff may follow up with the appellant via email and/or phone if there are any questions or missing materials in the appeal submission, to ensure that the appeal package is complete and meets the applicable LAMC provisions.

If you seek judicial review of any decision of the City pursuant to California Code of Civil procedure Section 1094.5, the petition for writ of mandate pursuant to that section must be filed no later than the 90th day following the date on which the City's decision became final pursuant to California Code of Civil Procedure Section 1094.6. There may be other time limits which also affect your ability to seek judicial review.

APPEAL DOCUMENTS

1. Hard Copy

Provide three sets (one original, two duplicates) of the listed documents for each appeal filed.

- ☒ Environmental Appeal Application
- ☒ Justification/Reason for Appeal
- ☒ Copies of the written Letter of Determination (LOD), from the final appellate body, which must be a non-elected decision-making body.

2. Electronic Copy

- ☒ Provide an electronic copy of the appeal documents on a USB flash drive. The following items must be saved as individual PDFs and labeled accordingly (e.g., "Appeal Form", "Justification/Reason Statement", or "Original Determination Letter"). No file should exceed 70 MB in size.

3. Appeal Fee

- ☐ *Original Applicant.* The fee charged shall be in accordance with LAMC Section 19.01 B.1(a) (Appeal Fees) of Chapter 1, or LAMC Section 15.1.1F.1.a. (Appeal Fees) of Chapter 1A; or a fee equal to 85% of the original base application fee. Provide a copy of the original application receipt(s) to calculate the fee.
- ☒ *Aggrieved Party.* The fee charged shall be in accordance with the LAMC Section 19.01 B.1(a) (Appeal Fees) of Chapter 1, or LAMC Section 15.1.1F.1.b. (Appeal Fees) of Chapter 1A.

Note: City Clerk prepares the mailing list for CEQA appeals per LAMC Section 13B.11.C. (Notice Rules for CEQA) of Chapter 1A.

EXHIBIT D

City Planning Email Requesting Applicant Signature on Extension - August 5, 2026

Source:

Council File record / Applicant correspondence

The original one-page email print follows in the form received by the Applicant.

From: Stacy Munoz stacy.munoz@lacity.org 
Subject: Appeal of ENV-2024-6712-CE-1A (Extension of Time)
Date: August 5, 2026 at 9:22 AM
To: Rouzbeh Zarrinbakhsh, ESQ. rouzbeh@ggclawfirm.com
Cc: Sami Kohanim entitleandpermits@gmail.com, Alan Como alan.como@lacity.org



Hi! Regarding the appeal for the above-mentioned case. I received word from the City Clerk's Office that there was insufficient time to adhere to the legal mailing requirements for the month of August. This case will now be scheduled for the month of September. Please sign and date the attached form and return it to me as soon as possible to ensure we meet the September deadline. I will forward it to the Clerk's Office as soon as I receive it. thx!



LOS ANGELES
CITY PLANNING

Stacy Muñoz

Pronouns: She, Her, Hers

Management Analyst

Los Angeles City Planning

200 N. Spring St., Room 763

Los Angeles, CA 90012

T: (213) 978-1354 | Planning4LA.org



*****Please note, I am out of the office every other Friday*****

**Extnsion of Time ENV-2024-
6712-CE-1A.pdf**



EXHIBIT E

Unsigned CP-1947 Extension of Time Request

Source:

Los Angeles City Planning CP-1947 [3.4.2025]

The original two-page form follows. Both signature sections are blank.

APPLICATIONS



EXTENSION OF TIME REQUEST

For City or Area Planning Commission Applications or Appeals

Related Code Sections

Pursuant to Los Angeles Municipal Code (LAMC) Section 13A.2.5.A.1. (Decision Time Period) and LAMC Section 13A.2.8.C.4. (Appeal Procedures) of Chapter 1A, decision makers and appellate bodies may extend the time to act by mutual agreement with the applicant.

This form is to be used to request an extension of the time limit to act for Area or City Planning Commission decisions on legislative and quasi-judicial land use applications and appeals. This request must be made before the matter is agendized. If notice of the hearing has been mailed, the applicant is responsible for the cost of mailing the cancellation and new hearing notice.

THIS SECTION TO BE COMPLETED BY APPLICANT

Project Information

Project Address: 2166 North Stanley Hills Drive and 2172 North Stanley Hills Drive

Case No.: ENV-2024-6712-CE

Related Case Nos.: ZA-2025-1386-CU1-HCA-1A; ZA-2024-6711-CU1-HCA-1A

Application Invoice No.:

Applicant(s): Stanley Family Residence LLC c/o Rouzbeh Zarrinbakshs

Representative: Sami Kohanim, Entitle and Permits

Request for Extension of Time Limit

The current time limit for the Commission to decide the subject case application/appeal will expire on: August 28, 2026. It is hereby requested to extend the time limit for the City Planning Commission to act for a period of _____ weeks, or until September 30, 2026.

Reason(s) for Request:

Insufficient time for the legal mailing requirements to be met. Extending the time to the month of September of 2026.

Signature: _____ **Date:** _____

Print Name: _____ **Email:** _____

THIS SECTION TO BE COMPLETED BY PLANNING STAFF

- ☒ Pursuant to LAMC Section 12.24, I.4
[applicable Code Section which permits extensions of time limits by mutual written consent of the applicant and decision-maker], and in accordance with the policy of the Area/City Planning Commission delegating authority to the Director of Planning to approve extensions of time limits on its behalf, the requested time extension is deemed routine in nature and will not prejudice the future decision by the Area/City Planning Commission on the merits of the subject application or appeal, and **therefore the requested time extension is granted until:**

September 30, 2026.

- ☐ Applicant to pay all Public Hearing Notice costs associated with a new Hearing or cancellation.

VINCENT P. BERTONI, AICP
Director of Planning

By Signature: _____ **Date:** _____

Print Name: _____ **Title:** _____

cc: Case File

EXHIBIT F

Official City Clerk Notice Scheduling September 22, 2026 PLUM Hearing

Official source:

https://cityclerk.lacity.org/onlinedocs/2026/26-1033_misc_08-28-26.pdf

The original two-page City Clerk notice follows.

PATRICE Y. LATTIMORE
CITY CLERK

RUBEN VIRAMONTES
EXECUTIVE OFFICER

City of Los Angeles CALIFORNIA



KAREN BASS
MAYOR

OFFICE OF THE
CITY CLERK

Council and Public Services Division
200 N. Spring Street, Room 395
Los Angeles, CA 90012
General Information - (213) 978-1133
FAX: (213) 978-1040

clerk.lacity.org

August 28, 2026

ENV-2024-6712-CE-1A
Council District 4

NOTICE TO APPLICANT(S), OWNER(S), APPELLANT(S), NEIGHBORHOOD COUNCIL, AND INTERESTED PARTIES

You are hereby notified that the Planning and Land Use Management (PLUM) Committee of the Los Angeles City Council will hold a public hearing in-person on **Tuesday, September 22, 2026** at approximately **2:00 P.M.**, or soon thereafter, in the John Ferraro Council Chamber, Room 340, City Hall, 200 North Spring Street, Los Angeles, CA 90012 (entrance on Main Street), to consider the following: Categorical Exemption from the California Environmental Quality Act (CEQA) pursuant to CEQA Guidelines, Sections 15303, Class 3 and Section 15332, Class 32, and related CEQA findings; report from the Central Los Angeles Area Planning Commission (CLAAPC); and, an appeal filed by Concerned Citizens of Stanley Hills Drive (Representative: Jamie T. Hall, Channel Law Group, LLP), from the determination of the CLAAPC in approving a Categorical Exemption as the environmental clearance for a new two-story single-family dwelling with attached two-car garage, swimming pool, and spa, the proposed residence will contain approximately 2,338 square feet in floor area, consisting of 1,030 square feet on the first floor, 1,149 square feet on the second floor, and a 359 square-foot garage (200 square feet is exempt from floor area calculations), the proposed structure will be a maximum of 28 feet in height with a rooftop deck, site grading includes 437 cubic yards of cut and 322 cubic yards of fill, the Project includes the construction of two retaining walls up to 10 feet in height; for the properties located at 2166 North Stanley Hills Drive and 2172 Stanley Hills Drive.

Applicant: Rouzbeh Zarrinbakhsh, Stanley Family Residence, LLC
Representative: Sami Kohanim, Entitle and Permits
Case Nos. ZA-2025-1386-CU1-HCA-1A; ZA-2024-6711-CU1-HCA-1A
Related Cases: ZA-2025-1386-CU1-HCA; ZA-2024-6711-CU1-HCA

Note that pursuant to Los Angeles Municipal Code Chapter 1A, Section 13B.11.1.F.8, all California Environmental Quality Act (CEQA) appeal related documents filed by or on behalf of the appellant must be filed with the City Clerk no later than 5 business days prior to the date set for the hearing. CEQA appeal-related documents filed by any party other than the appellant (or the appellant's representatives) must be filed with the City Clerk no later than 2 business days prior to the date of the hearing. Documents submitted after these deadlines will be marked late and shall not be considered by the City Council in its review and decision on the CEQA appeal.

AN EQUAL OPPORTUNITY EMPLOYER

The audio for this meeting is broadcast live on the internet at: <https://clerk.lacity.org/calendar>.

Requests for reasonable modification or accommodation from individuals with disabilities, consistent with the Americans with Disabilities Act can be made by contacting the City Clerk's Office at (213) 978-1133. For Telecommunication Relay Services for the hearing impaired, please visit this site for information: <https://www.fcc.gov/consumers/guide/telecommunications-relay-services-trs>.

If you are unable to appear at this meeting, you may submit your comments in writing. Written comments may be addressed to the City Clerk, Room 395, City Hall, 200 North Spring Street, Los Angeles, CA 90012, or submitted through the Public Comment Portal: www.LACouncilComment.com.

In addition, you may view the contents of Council file No. **26-1033** by visiting: www.lacouncilfile.com.

Please be advised that the Planning and Land Use Management Committee reserves the right to continue this matter to a later date, subject to any time limit constraints.

For inquiries about the project, contact City Planning staff:

Jordann Turner

(213) 978-1318

jordann.turner@lacity.org

Alan Como

(213) 978-1318

alan.como@lacity.org

For inquiries about the meeting, contact City Clerk staff:

Candy Rosales

(213) 978-1078

clerk.plumcommittee@lacity.org

Note: If you challenge this proposed action in court, you may be limited to raising only those issues you or someone else raised at the public hearing described in this notice, or in written correspondence delivered to the City Clerk at, or prior to, the public hearing. Any written correspondence delivered to the City Clerk before the City Council's final action on a matter will become a part of the administrative record. The time in which you may seek judicial review of any final action by the City Council is limited by California Code of Civil Procedure Section 1094.6 which provides that an action pursuant to Code of Civil Procedure Section 1094.5 challenging the Council's action must be filed no later than the 90th day following the date on which the Council action becomes final.

EXHIBIT G

Current Los Angeles Zoning Code - CEQA Appeal Deadline and Extension Provisions

Official source:

<https://zoning.lacity.gov/browse/13B>

Official-source excerpts are reproduced for convenience. The current official Zoning Code controls.

CURRENT CODE EXCERPTS

LAMC section 13B.11.1.F.7(a) - City Council time to act on CEOA appeal

The City Council shall act within 75 days after expiration of the appeal period. The 75-day time limit may be extended by mutual written consent of the applicant and the City Council. If the City Council fails to act within the time limit, the failure constitutes denial of the appeal.

LAMC section 13A.2.8.F.2 - general appellate decision rule

The appellate body must act within the prescribed time. Failure of the appellate body to render a timely decision results in denial of the appeal.

LAMC section 13A.2.2.B.3 - extensions generally

Unless a specific process provides otherwise, a time limit may be extended only when mutually agreed upon in writing by the applicant and the decision-making official or agency.

Application here: The appeal period ended July 1, 2026. Seventy-five days later is September 14, 2026. A later internal transmittal or receipt date is not identified as a trigger, and no mutual written Applicant consent was executed.

[Official Article 13 browse page](#)

[Official Part 13B browse page](#)

These excerpts are faithful summaries of the current official online code and are included to direct the City to the controlling provisions; the official text controls.

EXHIBIT H

City Clerk Memorandum to File - Council File 24-1418

Official source:

https://cityclerk.lacity.org/onlinedocs/2024/24-1418_misc_1-22-25.pdf

The following is a faithful transcription of the official one-page memorandum dated January 22, 2025.

OFFICE OF THE CITY CLERK
COUNCIL AND PUBLIC SERVICES DIVISION**Council File No. 24-1418**

January 22, 2025

MEMORANDUM TO FILE

The purpose of this memorandum is to note for the record, with regard to City Planning Case No. CPC-2022-3867-DB-MCUP-SPR-WDI-HCA and Environmental Case No. ENV-2022-3868-SCEA, pertaining to the properties located at 6626 West Hollywood Boulevard, 6626-6636 West Hollywood Boulevard, and 1638-1644 North Cherokee Avenue, the City Council failed to act within the prescribed time limit. As specified in Los Angeles Municipal Code Section 13A.2.8.F.2, failure of the appellate body to render a timely decision shall result in the denial of the appeal.

Candy Rosales
Deputy City Clerk

Faithful transcription for convenience. The official City Clerk PDF at the source link controls.

EXHIBIT I

City Planning Extension Request - Council File 25-1476

Official source:

https://cityclerk.lacity.org/online/docs/2025/25-1476_rpt_dcp_12-16-25.pdf

The following reproduces the material timing language from City Planning's official December 16, 2025 letter.

DEPARTMENT OF CITY PLANNING

December 16, 2025

Los Angeles City Council
Office of the City Clerk
Attention: PLUM Committee

Re: Request for Extension of Time to Act on CEQA Appeal - Council File 25-1476

Pursuant to Los Angeles Municipal Code Chapter 1A, Section 13B.11.1.F.7, the City Council is required to act on an appeal of a CEQA determination within 75 days of the filing of the appeal, unless the time is extended. The appeal was filed on November 13, 2025, resulting in an original deadline for City Council action of January 27, 2026.

To allow sufficient time for scheduling and consideration of the appeal, the Department of City Planning requested an extension to March 25, 2026.

Relevance: City Planning treated the appeal filing as the operative event and requested an extension for scheduling rather than treating later internal transmittal as restarting the clock.

Faithful material transcription for convenience. The official City Planning letter at the source link controls.

EXHIBIT J

Channel Law Group Prior Deadline Position - Council File 25-1518

Official source:

https://cityclerk.lacity.org/online/docs/2025/25-1518_misc_03-31-26.pdf

This exhibit summarizes the March 31, 2026 submission by Appellant's counsel in another Council CEQA appeal. It is offered for consistency, not as judicial estoppel.

SOURCE SUMMARY AND LIMITED EXCERPTS

In Council File 25-1518, Channel Law Group argued to the City Council and City Attorney that the 75-day CEQA appeal deadline had expired, that timely mutual written applicant consent was required, and that a later Council signature could not retroactively restore the administrative appeal.

Limited excerpts from the official submission:

"the appeal was deemed denied by operation of law"
"timely, mutual written consent"
a later signature "cannot retroactively resuscitate a lapsed timeline"

The Applicant Parties do not contend that this creates judicial estoppel or a binding admission. The prior submission is relevant because it demonstrates that the deadline interpretation requested here is neither novel nor opportunistic; it is the same interpretation Appellant's counsel urged the City to enforce for another client.

The official March 31, 2026 submission at the source link controls.