

Communication from Public

Name: Applicant's Supplemental Demand Regarding Deadline Removal.
Date Submitted: 08/29/2026 11:33 AM
Council File No: 26-1033
Comments for Public Posting: Supplemental demand regarding removal of the City's previously posted deadline entries, preservation of records, prior deemed-denial precedent, inconsistent application of the 75-day rule, and request to cancel the September 22, 2026 hearing absent a valid timely extension.

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 - REVISED SUPPLEMENTAL PRE-LITIGATION AND PRESERVATION NOTICE

August 29, 2026

TO: Office of the City Clerk; Planning and Land Use Management Committee and Committee Clerk; Los Angeles City Planning; Office of the City Attorney; Council President and PLUM Chair; Council District 4; and all personnel responsible for CFMS deadline entries, scheduling, and the public docket

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
Appellant	Concerned Citizens of Stanley Hills Drive

SUPPLEMENTAL DEMAND FOR EXPLANATION OF DEADLINE-RECORD CHANGES; CONSISTENT APPLICATION OF THE 75-DAY RULE; FORMAL LITIGATION HOLD; AND REQUEST TO CANCEL THE SEPTEMBER 22, 2026 HEARING

IMMEDIATE ACTION REQUESTED

- Place this revised supplement in Council File 26-1033 and transmit it immediately to the Office of the City Attorney and every official responsible for the deadline, scheduling, and public docket.
- Explain why the previously displayed Time Limit / Last Day To Act entries disappeared or were presented differently; preserve the full CFMS audit trail, display history, screenshots, and all related communications.
- Identify and produce any document the City contends validly and timely extended the deadline, including all required applicant and City-side consents.
- Apply the City's deemed-denial rule consistently. Absent a valid, timely extension or timely final Council action, cancel the September 22 hearing and enter the appropriate deemed-denial memorandum.

Entitle and Permits, through Sam Kohanim, authorized representative for Stanley Family Residence, LLC (the "Applicant"), submits this revised supplement to the Applicant's August 28, 2026 filing. It does not replace or narrow the prior filing. It addresses the subsequent public-record change, adds comparable City records, renews the demand to cancel the untimely September 22 hearing, and preserves all procedural, merits, and judicial remedies.

I. THE PUBLIC DEADLINE ENTRIES WERE OBSERVED MISSING OR CHANGED AND REQUIRE A PROMPT, DOCUMENTED EXPLANATION

On August 27 and August 28, 2026, the public Council File page displayed a row captioned "Time Limit Last Day To Act Pursuant To" showing August 30, 2026 and August 28, 2026 under the Los Angeles Municipal Code. The August 28 preservation filing captured those entries, together with the later September 22 PLUM setting, the absence of any Council vote, and the absence of a posted executed extension.

On August 29, the public page available to the Applicant's representative no longer displayed that Time Limit / Last Day To Act Now (**see attached**). It continued to identify the matter as pending in PLUM, showed an August 28 last-changed date and a September 22 committee setting, and did not post any activity identifying an extension, applicant consent, Committee Chair consent, Council President consent, or Council vote. The page also showed an August 28, 2028 "Expiration Date," but that separate file-management field is not a substitute for the statutory time-to-act entry.

The Applicant's representative has preserved dated screenshots and PDF captures showing the public docket before and after the observed change. Those materials are being retained for the administrative record and for potential litigation, including any writ proceeding. This is stated respectfully and is not an accusation about motive. The City should disclose whether the underlying CFMS data changed, whether only the public presentation or cache changed, whether an automated rule was applied, or whether a manual or substantive decision was made. Because the affected field concerns the City's power and time to act, the exact reason and complete change history should be preserved and explained now.

Official records: [Council File 26-1033 live docket](#)

II. COMPARABLE COUNCIL FILES RETAIN OR TRANSPARENTLY UPDATE DEADLINE ENTRIES; SIMILAR CASES DID NOT REMOVE THE LAST DAY TO ACT

The comparable City records reviewed do not show a customary practice of silently removing the Last Day To Act while leaving a matter pending for a later hearing without a docketed extension. Instead, they show a transparent chronology: the deadline remains

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

visible, the extension is expressly recorded, and the applicant and City-side consent documents are posted. When the deadline is missed without extension, the expired deadline remains visible and the Clerk documents the resulting denial.

Council File	Public-record treatment	Why it matters here
24-1418	The expired January 14, 2025 Time Limit / Last Day To Act remains displayed. The Clerk later filed a memorandum stating that Council failed to act timely and the appeal was denied.	The missed deadline was retained and formally documented; it was not erased.
26-0766	The updated August 28, 2026 deadline remains displayed. The activity log expressly records an extension from July 26, and the file posts applicant-representative and Committee Chair consents.	A claimed extension is public, dated, traceable, and supported by consent documents.
26-0984	The December 11, 2026 deadline remains displayed. The activity log states the original and new dates and posts applicant and Committee Chair consents.	The extended deadline is shown rather than substituted through an unexplained display change.
26-0497	The December 18 time limit and December 11 last day remain displayed. Two separate extensions and their chronology are recorded.	Even multiple extensions are publicly traceable; the Last Day To Act is retained.

City Planning likewise stated in Council File 25-1476 that a CEQA appeal filed November 13, 2025 produced an original January 27, 2026 Council deadline and then requested an extension for scheduling. It did not claim that a later internal transmittal restarted the 75-day clock. If the City contends that an established policy permits the unexplained removal or suppression observed here, it should identify the exact written policy and comparable Council files.

Official records: [CF 24-1418](#) | [CF 26-0766](#) | [CF 26-0984](#) | [CF 26-0497](#) | [CF 25-1476 extension request](#)

III. THE CITY'S OWN RECORDS APPLY DEEMED DENIAL WHEN THE TIME TO ACT EXPIRES; THE CITY MAY NOT PICK AND CHOOSE OR APPLY THE RULE ARBITRARILY

A. Council File 24-1418 - City Council failure to act resulted in denial of the appeal

In Council File 24-1418, the Deputy City Clerk filed a January 22, 2025 memorandum stating that the City Council "failed to act within the prescribed time limit" and that, under LAMC section 13A.2.8.F.2, failure of the appellate body to render a timely decision "shall result in the denial of the appeal." The live docket continues to display the expired January 14, 2025 deadline and the memorandum; the City did not remove the date and carry the appeal forward to a later merits hearing. Although the precise prescribed period in that file arose under its own governing provisions, it is a direct Council-level application of the same general deemed-denial rule relied on here.

Official records: [CF 24-1418 docket](#) | [City Clerk deemed-denial memorandum](#)

B. Council File 25-0310-S1 - no mutually agreed extension beyond 75 days; appeal deemed denied

In Council File 25-0310-S1, the City's May 30, 2025 public notice expressly stated that the first-level appellate body and the applicant "failed to mutually agree on an extension of time" beyond the specified 75 days. The notice then applied Government Code section 66452.5(c)(1) and LAMC section 13A.2.8.F.2, declared the appeal deemed denied, and stated that the Zoning Administrator's determination stood. That matter involved a first-level appeal rather than this Council-level CEQA appeal, but it is a current, City-authored application of the same operative structure: a fixed 75-day period, mutual agreement as the condition for additional time, and deemed denial when the appellate body does not act timely.

Official records: [CF 25-0310-S1 City notice](#)

These records are not offered as judicial precedent, and the Applicant does not suggest that every procedural detail is identical. They are offered as the City's own contemporaneous administrative interpretation. The City may identify and apply a genuine statutory or factual distinction. It may not, however, enforce mandatory expiration and deemed denial in one file while treating the same provisions as optional in another without a reasoned, documented basis. An unexplained departure would raise serious arbitrary-and-capricious and abuse-of-discretion concerns and would unnecessarily invite judicial review.

IV. THE PRESENT APPELLANT'S COUNSEL PREVIOUSLY ARGUED THAT THE 75-DAY DEADLINE BARRED A POST-DEADLINE HEARING, APPEARED UNDER PROTEST, AND ITS CLIENT THEN FILED A WRIT ACTION - THE CITY CANNOT APPLY OPPOSITE RULES WITHOUT A REASONED DISTINCTION

Council File 25-1518, concerning the Barry Building, is particularly instructive because Channel Law Group and Jamie T. Hall - the same counsel currently representing the Appellant in Council File 26-1033 - presented the 75-day position to the same City decision-making structure on behalf of a different client, Angelenos for Historic Preservation (AHP).

On March 31, 2026, counsel asserted that the City's jurisdiction had expired on March 6 under the mandatory 75-day deadline; that the appeal was "deemed denied by operation of law"; that a noticed April 14 PLUM hearing was without legal authority; and that a Council President signature obtained after expiration "cannot retroactively resuscitate a lapsed timeline." Counsel further stated that the mandatory 75-day window remained absolute and threatened immediate judicial review.

On April 13, 2026, counsel submitted additional objections under the bold heading "APPEARANCE STRICTLY UNDER PROTEST: THE CITY HAS LOST JURISDICTION." The filing repeated that the City had failed to obtain timely mutual written consent before the 75-day deadline, that the appeal had been deemed denied, and that participation in the April 14 hearing did not waive judicial relief. The City nevertheless conducted the hearing and later took Council action.

AHP and the Los Angeles Conservancy later filed a Los Angeles Superior Court writ action against the City and project owner, Case No. 26STCP01963. Public descriptions of the petition identify alleged official action after the City had lost jurisdiction as one of the challenged forms of conduct. The writ action had multiple grounds; this letter does not represent that the 75-day issue was its sole claim or that any court has adjudicated that issue.

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

This history is not offered as judicial estoppel or as a binding admission by the present Appellant, because the Barry Building matter involved a different client. Nor is any impropriety alleged merely because counsel represents different clients. It is relevant because it demonstrates that the 75-day interpretation asserted here is neither novel nor opportunistic. More importantly, the City cannot administer the same public deadline as mandatory when invoked in one Council file and optional in another without identifying a principled statutory and factual distinction. The City and present Appellant cannot fairly ask the City to disregard here the exact expiration theory their counsel insisted the City was bound to honor in the Barry Building proceeding.

Official records: [March 31, 2026 jurisdictional objection](#) | [April 13, 2026 hearing objection](#) | [CF 25-1518 docket](#) | [L.A. Conservancy lawsuit announcement](#) | [Public petition summary](#)

V. REMOVING, HIDING, OR CHANGING A PUBLIC FIELD CANNOT CREATE AN EXTENSION OR CURE THE SEPTEMBER 22 TIMING PROBLEM

The City's CEQA appeal form states that if the appellate body cannot hear and consider the appeal before the last day to act, the appeal is automatically deemed denied and the original decision stands; the last day may be extended only if formally agreed upon by the applicant. City Planning's August 5 request sought the Applicant's signature precisely because the Clerk reported insufficient time to satisfy the August mailing requirements. The Applicant did not sign or return the extension request. Neither Sam Kohanim nor Entitle and Permits executed or approved an extension, and neither was authorized to waive the Applicant's deadline rights.

The City's own public entries identified August 30 as the time limit and August 28 as the last day to act. Independently, even if July 1, 2026 were used solely for argument as the operative filing date, 75 days would end by September 14, 2026. A September 22 PLUM hearing therefore falls outside either calculation and cannot itself constitute timely final Council action. The August 28 hearing notice also recognizes that continuances remain subject to time-limit constraints.

A scheduling entry, an internal transmission delay, an unexplained display change, or a late or retroactive consent cannot substitute for timely mutual agreement. The Applicant expressly withholds consent to any prospective, retroactive, implied, or after-the-fact extension. Any protective merits filing or appearance will remain under continuing objection and will not waive the deadline issue, the preservation demand, or any judicial remedy.

VI. DEMAND FOR IMMEDIATE ACTION AND WRITTEN RESPONSE

- 1. Docket and distribute.** Place this complete revised supplement in Council File 26-1033 without alteration and immediately transmit it to the City Clerk, PLUM Committee Clerk and Chair, Council President, City Planning, Council District 4, the Office of the City Attorney, CFMS administration, and all personnel responsible for deadline entries and scheduling.
- 2. Explain every deadline-record and display change.** Identify the exact date and time the Time Limit / Last Day To Act information was changed, removed, hidden, suppressed, or presented differently; whether the underlying database value changed or only the public-facing display, cache, report, or session output changed; whether the action was manual, automated, or system-generated; the person, account, office, or process responsible; who requested or approved it; the reason; the asserted authority; the duration; and every affected field, including any change to the separate Expiration Date.
- 3. Preserve and disclose the complete audit trail.** Preserve and provide all field-level edit histories, prior values, transaction and access logs, timestamps, user and service-account identifiers, instructions, tickets, scripts, rules, automated jobs, version history, backups, exports, cached pages, reports, and technical documentation affecting Council File 26-1033. Do not overwrite, purge, rotate, or make historical values unavailable.
- 4. Correct and clarify the public record.** Restore and retain the previously displayed deadline values or add a conspicuous, dated activity entry identifying the prior values, the exact nature and reason for the change, and the authority relied upon. If the City claims the difference was only a browser, cache, or presentation issue, explain that fact publicly and identify why comparable files continue to display their deadline information.
- 5. Produce any alleged extension.** Identify and post every writing or communication the City contends extended the deadline, including the complete executed document, native metadata, date and time of execution, applicant consent, City-side consent, and evidence of each signatory's authority. If no valid, timely, mutually executed extension exists, confirm that fact expressly.
- 6. Apply the rule consistently and explain any claimed distinction.** State whether the City will follow its treatment in Council Files 24-1418 and 25-0310-S1 and its transparent extension practice in Council Files 26-0766, 26-0984, 26-0497, and 25-1476. If not, identify the precise statutory language, facts, and written policy that distinguish Council File 26-1033. Also address why the 75-day position presented in Council File 25-1518 does or does not apply. A conclusory statement that the file was transmitted late is not a principled legal distinction and does not establish applicant consent.
- 7. Cancel the September 22 hearing and record deemed denial.** Unless the City produces a valid, timely, mutually executed extension or establishes timely final Council action, remove Council File 26-1033 from the September 22 calendar. If the City adheres to the displayed August 30 limit, file the deemed-denial memorandum on the first business day thereafter. If the City claims another deadline, provide the full calculation and authority immediately; in all events, September 22 is later than the September 14 alternative described above.
- 8. Update administrative status and appeal-related holds.** Upon deemed denial, confirm that the underlying CLAAPC determinations stand and promptly notify every affected department to remove any hold premised solely on the continued pendency of this CEQA appeal. This request does not seek permission to commence work without all independent permits, clearances, and conditions otherwise required by law.
- 9. City Attorney review and written response.** Provide a response approved by the Office of the City Attorney. Confirm docketing, distribution, and implementation of the preservation hold by 12:00 noon on Monday, August 31, 2026. Provide the substantive explanation, extension record, and scheduling/status determination by 5:00 p.m. on Tuesday, September 1, 2026, before any further alteration or action affecting the public record.

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

VII. FORMAL RECORD-PRESERVATION AND LITIGATION-HOLD NOTICE

The Applicant is evaluating judicial relief, including a petition for writ of mandate, if the City proceeds after expiration of the unextended time to act, applies the deadline inconsistently, or alters the public record without a documented legal basis. Litigation is therefore reasonably foreseeable. The City and every custodian should immediately suspend routine deletion, overwriting, auto-purge, log rotation, modification, or loss of potentially relevant information and preserve it in native format with complete metadata.

- Preserve all CFMS database records, field histories, transaction and access logs, user and service-account identifiers, timestamps, deleted or hidden values, backups, cached pages, screenshots, exports, reports, change tickets, system rules, automated jobs, source code or configuration governing display logic, and technical documentation concerning Council File 26-1033, its deadline fields, Expiration Date, last-changed date, scheduling, online-document postings, and public display.
- Preserve all emails, texts, Teams or other internal messages, call notes, memoranda, drafts, routing slips, calendar entries, meeting notes, mailing and publication records, notices, extension forms, signature records, metadata, and communications concerning the appeal filing date, 75-day calculation, late Planning transmittal, receipt by the Clerk or Council, notice requirements, requested extension, Applicant non-consent, September scheduling, the August 28 filing, and the subsequent public-page change.
- Preserve any analysis or communication comparing Council File 26-1033 with Council Files 24-1418, 25-0310-S1, 25-1518, 25-1476, 26-0766, 26-0984, 26-0497, or any other file cited or considered in deciding how to display, calculate, extend, or enforce the deadline.
- Relevant custodians include personnel in the City Clerk and Council and Public Services Division, PLUM Committee and staff, City Planning, the Office of the City Attorney, Council District 4, the Council President and PLUM Chair offices, Information Technology and CFMS administration, and any person communicating with the Appellant, Appellant's counsel, the Applicant, Sam Kohanim, or Entitle and Permits about these subjects.

Please circulate this hold immediately, document all recipients and preservation steps, and confirm implementation in writing. This demand is without prejudice to a California Public Records Act request, a request to complete or correct the administrative record, a motion for extra-record evidence, or discovery and sanctions remedies in any judicial proceeding.

VIII. CONCLUSION AND CONTINUING NON-WAIVER

The Applicant prefers prompt administrative correction over unnecessary litigation. The present record can be addressed by preserving and explaining the deadline-display change, applying the City's own deemed-denial rule consistently, producing any valid extension immediately, and cancelling a hearing scheduled after every presently supportable deadline. The City should not expose the Applicant, the public, or the City itself to avoidable expense by proceeding without first resolving these threshold defects in a transparent written record.

Nothing in this letter waives the Applicant's position that the appeal is or will be denied by operation of law; any objection to a retroactive, implied, or unauthorized extension; any procedural or merits defense; any request for removal of appeal-related holds; or any judicial remedy. All rights are expressly reserved.

Respectfully submitted,

ENTITLE AND PERMITS

/s/ Sam Kohanim Sam Kohanim

/s/ Rouzbeh Zarrinbakhsh

Authorized Representatives for Stanley Family Residence, LLC
entitleandpermits@gmail.com | (310) 488-1369

Source note: The linked official City records and cited public litigation materials control. The comparable administrative records are offered as evidence of City practice and consistency, not as judicial precedent. No court ruling on the 75-day issue in Case No. 26STCP01963 is represented here.

LACityClerk Connect

Council File Management System

Council File: 26-1033



07/29/2026

Last Changed Date

08/28/2026

Expiration Date

08/28/2028

Time Limit

08/30/2026

Last Day To Act

08/28/2026

Pursuant To

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

File Activities

Date	Activity
08/28/2026	Planning and Land Use Management Committee scheduled item for committee meeting on September 22, 2026.
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 (Doc)

Title	Doc Date
Communication from Deputy Clerk - Notice	08/28/2026
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-2024-6711)	07/27/2026

Council Vote Information

No votes were found.

LACityClerk Connect

Council File Management System

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

08/28/2026

Expiration Date

08/28/2028

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

File Activities

Date	Activity
08/28/2026	Planning and Land Use Management Committee scheduled item for committee meeting on September 22, 2026.
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.

Online Documents (Doc)

Title	Doc Date
Communication from Applicant	08/28/2026
Communication from Deputy Clerk - Notice	08/28/2026
Communication(s) from Public	08/28/2026
Attachment to Report dated 7-27-	07/27/2026

Council Vote Information

No votes were found.