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MOVE CULVER CITY

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9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

12 FRIENDS AND FAMILIES FOR MOVE  
CULVER CITY,  
13  
14 Petitioner and Plaintiff,  
15  
16 v.  
17 CITY OF CULVER CITY; CITY COUNCIL  
OF THE CITY OF CULVER CITY; and  
18 DOES 1-10, Inclusive,  
Respondents and Defendants.

19 CITY OF CULVER CITY,  
TRANSPORTATION PLANNING; and  
20 DOES 11-20, Inclusive.  
21  
22 Real Parties in Interest and  
Defendants.

Case No. 23STCP03833

**DECLARATION OF ELLIS RASKIN ISO  
EX PARTE APPLICATION FOR STAY**

Assigned for All Purposes to the Hon. Richard  
L. Fruin (Dept. 15)

Action Filed: October 17, 2023

Ex Parte Hearing Date: Sept. 04, 2024  
Ex Parte Hearing Time: 8:30 a.m.

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1 this declaration. As of the time of filing of this declaration and ex parte application, counsel for the  
2 City has not responded to indicate whether the City will oppose the ex parte application.

3 I declare under penalty of perjury under the laws of the State of California that the  
4 foregoing is true and correct, and that I have executed this declaration in the County of Los  
5 Angeles, California, on September 3, 2024.

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8 Ellis Raskin  
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# **EXHIBIT 1**

**From:** City of Culver City <[culvercity@public.govdelivery.com](mailto:culvercity@public.govdelivery.com)>

**Date:** August 29, 2024 at 7:57:27 AM PDT

**To:** [Redacted]

**Subject:** Construction Notice: MOVE Culver City Project in Downtown and Arts District



## **Construction Notice**

### **MOVE Culver City Project: Downtown and Arts District**

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#### **What**

Signing, striping, and traffic signal modifications are coming to Culver Blvd between Duquesne Ave and Canfield Ave and Washington Blvd between Canfield Ave and La Cienega Blvd.

Improvements include:

- A protected, 24/7 bus-bike lane on Culver Blvd from Duquesne Ave to Canfield Ave and on Washington Blvd from Canfield Ave to Helms Ave.
- Extension of the existing bus-bike lanes on Washington Blvd from La Cienega Ave eastward to La Cienega Blvd (approx. 1,500 extension).
- Restoration of a general-purpose travel lane on Culver Blvd between Duquesne Ave and Canfield Ave and on Washington Blvd from Canfield Ave to Helms Ave.
- Repaving of Washington Blvd between Ince Blvd and Robertson Blvd/Higuera St.
- Refreshing pavement markings and signage as necessary along the Project corridor.

## When

Construction will begin in September 2024 and is expected to be substantially complete by December 2024.

## Construction Impacts

The City is working to minimize dust, noise, and temporary lane closures throughout construction. However, some level of construction impacts are anticipated to occur.

- One lane of traffic in each direction will be maintained at all times.
- Businesses will remain open, and access will be provided during normal business hours.

For everyone's safety, please observe all posted traffic controls, parking restrictions, and detours.

## Coming in 2025

In 2025, the City will be implementing the next phase of MOVE Culver City. Improvements include bus and bike improvements on:

- Washington Boulevard between La Cienega Boulevard and Fairfax Avenue
- Adams Boulevard between Washington Boulevard and Fairfax Avenue

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## More Information

[Visit the project website at MOVE Culver City](#) for the latest construction information and to sign up for email updates.

For project-related inquiries, contact:

**City Construction Manager**

Thomas Check

Senior Traffic Engineer

[thomas.check@culvercity.org](mailto:thomas.check@culvercity.org)

[\(310\) 253-5627](tel:(310)253-5627)

**Consultant Construction Manager**

Bob Neiwirth

RTI Consulting

[bob.neiwirth@rticm.com](mailto:bob.neiwirth@rticm.com)

[\(310\) 383-2613](tel:(310)383-2613)

Thank you for your patience!



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**From:** City of Culver City <[culvercity@public.govdelivery.com](mailto:culvercity@public.govdelivery.com)>

**Sent:** Saturday, August 31, 2024 8:25 AM

**To:** [Redacted]

**Subject:** Have Questions About MOVE Culver City? We Have Answers For You



## **MOVE Culver City: Frequently Asked Questions**

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### **What is MOVE Culver City?**

MOVE Culver City is an initiative to create mobility options for everyone. MOVE Culver City is a city-led effort that envisions a reimagining of our streets as public spaces and prioritizes moving people more efficiently and safely in the design of the street. The project's goal is to help ensure that bus passengers, cyclists, and emergency vehicles will all benefit from increased speeds, ease of travel, and

reliability of sustainable connections to key destinations and regional transit connections.

After the implementation of the Downtown Corridor pilot in November 2021, the City conducted a year-long pilot evaluation period that involved extensive data analysis as well as collection of public feedback. Following this pilot evaluation, the City Council directed staff to modify the project's design. On September 11, 2023, the City Council voted 3-2 to ratify plans to modify the MOVE Culver City pilot project and found the Modified Project exempt from the California Environmental Quality Act (CEQA). In October 2023, "Friends and Families for MOVE Culver City" filed a lawsuit challenging the legality of the City's approved modifications. On Tuesday, August 13, 2024, the Court issued a Statement of Decision finding in favor of the City on all causes of action. [You can read the decision in full on the City's website.](#)

During the lawsuit, the City delayed work on the Downtown Corridor with the goal of aligning the final decision of the trial court with the start of pre-construction activities for the Modified Project. Now that the legal challenge is resolved, City staff are prepared to immediately move forward with construction.

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## **When is construction happening?**

Construction is scheduled to begin the first week of September 2024 and is expected to be completed in 2 to 3 months.

Construction is a dynamic process, and the project team will share more information as it becomes available. Weekly updates on the construction schedule and expected closures will be provided at [the MOVE Culver City website](#) and by email.

## **Will I be able to drive through Downtown and the Arts District during construction?**

Yes. The community will be able to drive along the entire MOVE Culver City corridor during construction. At least one lane of traffic will be maintained at all times in each direction.

## **Where will the buses run during construction?**

Beginning Thursday, September 5, 2024, all transit buses will detour onto Venice Boulevard between Clarington Avenue and La Cienega Boulevard. These detours will affect Culver CityBus Lines 1, 1C1, 5, and 7, LADOT CE437A, Big Blue Bus Route 17, and Metro Line 617.

In general, Culver CityBus buses will use existing Metro bus stops on Venice. Use the [NextCCBus app](#) or visit the [Culver CityBus website](#) for updated bus stops, detours and closure information.

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## What will be different from the existing design?

The new design will restore a second lane of vehicle traffic where it is feasible and needed to address traffic congestion. To fit a second vehicle lane, separate bus and bike lanes will be combined into shared bus/bike lanes.

### MOVE Culver City: Modified Downtown Corridor Layout

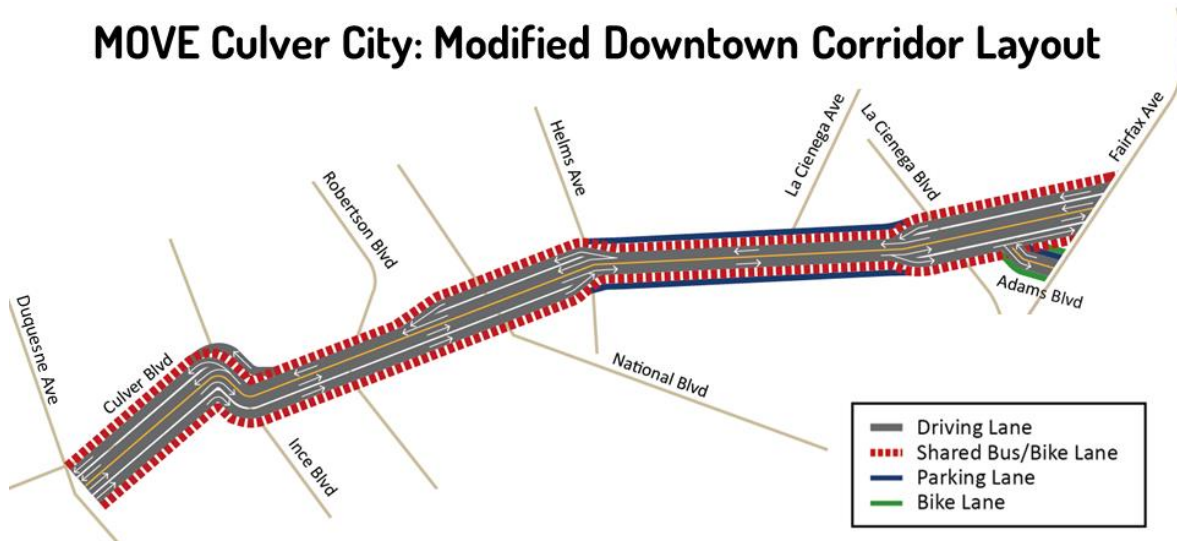


*Illustration of the MOVE Culver City Project showing the Modified Downtown Corridor Layout from Duquesne to Fairfax.*

This phase of construction (the Western Segment) will extend the shared bus/bike lanes 1,500 feet east of their current endpoint at Washington/La Cienega Ave to Washington/La Cienega Blvd. In 2025, the Eastern Segment will be built, extending the lanes 1,500 feet further to the city boundary at Washington/Fairfax. Bike lanes will also be built on one block of Adams Blvd to seamlessly connect with existing bike lanes in the City of Los Angeles.

### MOVE Culver City: Modified Downtown Corridor

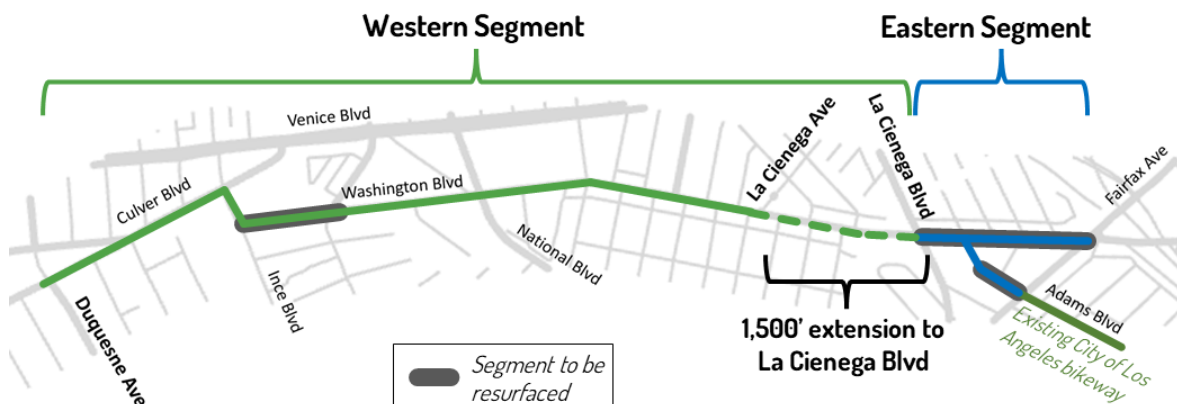


*Illustration of the MOVE Culver City Project showing the Western and Eastern Segment throughout Downtown.*

Many other changes are coming as part of this project. Read on to find out more.

## **Why does this project use plastic instead of concrete?**

The first version of MOVE Culver City was a pilot project. It used temporary materials like paint, wooden platforms, and plastic posts because the City Council wanted to test the concept of mobility lanes for improved sustainable mobility options. This method of roadway construction is called quick-build, and it is used because compared to permanent materials like concrete, it is less expensive, easy to modify, and quicker to build. In 2023, after an evaluation of the first pilot, the City Council directed staff to conduct another pilot with a modified design. This pilot will run for two years and will also use temporary materials. The data collected during both pilot projects will ultimately be used to inform a future permanent condition.

There are trade-offs to using the quick-build method. Paint and plastic have short lifespans and require more maintenance than concrete. Our team has received feedback regarding the aesthetics of the project. The painted curb extensions and plastic lane separators are not intended to last forever. The project team worked hard to find a barrier treatment for the Modified Project that maximizes safety, durability, visibility, and aesthetics. This pilot helps the community and its leaders make informed choices about a future permanent design.

## **will parking be affected?**

Most existing parking spots will remain. There are around 4,000 publicly accessible parking spots within one block of the MOVE Culver City corridor, with around 75% off-street (in lots or garages) and the remainder on-street. No off-street parking spaces will be impacted by the Modified Project, and care has been taken to limit any impact to on-street parking near the corridor.

Stopping or standing in shared bus/bike lanes is never allowed. Culver City PD actively patrols the project area, and drivers who park illegally in shared bus/bike lanes will be ticketed. The City will also be installing bus-mounted cameras to allow for photo enforcement of illegal parking in shared bus/bike lanes and at bus stops.

For pick-up and drop-off in the Downtown area, there are short-term loading zones on almost every block. Look for these signs to show you where to turn.



## **How will the changes affect traffic signal synchronization?**

Once construction is complete, the City will reconfigure the signals to adapt to the new traffic patterns. This process requires observation of the new traffic patterns, so it may take a few weeks to see improvements in signal synchronization.

## **What will happen to bus/bike platforms?**

The new design will restore a second lane of vehicle traffic where it is feasible and needed to address traffic congestion. To fit a second vehicle lane, separate bus and bike lanes will be combined into shared bus/bike lanes. Most bus/bike boarding platforms will be removed as buses will be able to stop at the curb. In the Arts District, three existing platforms will remain, and one new platform will be installed. These platforms will prevent buses from having to pull to the curb to pick up and drop off passengers, speeding up transit and allowing for more parking spots near bus stops.

If you are riding a bike in a shared bus/bike lane and a bus stops in front of you, you may have to wait for passengers to get on and off the bus. Most stops are brief, and you and the bus will soon be back on your way.

## **What will happen to the flexible posts?**

The Modified Downtown Corridor project will include several changes to lane delineation.

Vertical delineators (sometimes called bollards or flexible posts) and horizontal lane separators are used to keep everyone in their lane. These tools enhance the safety and functionality of shared bus/bike lanes by preventing unauthorized vehicles from entering. In case of emergency or obstruction, they are spaced widely enough allow buses, bikes, and emergency vehicles to pass through at low speeds, but are close enough to prevent vehicles from entering during normal circumstances.

During the first pilot, the project team received feedback regarding the vertical delineators used. The team has developed a revised design that maximizes safety, functionality, and aesthetics. Rather than the multiple types of delineators currently used, the Modified Corridor will feature only one model of vertical delineator and one model of horizontal delineator. Vertical elements will be spaced farther apart (30 feet instead of 5-11 feet) and will be shorter (28 inches instead of 36 inches) than the current implementation. Horizontal elements known as zebras will be installed in between vertical delineators to prevent vehicles from encroaching in the gaps. This treatment will be applied consistently throughout the Modified Project corridor, resulting in a better user experience.

Before



After (Render)



## **What will happen to bike lanes?**

Protected bike lanes on Culver Blvd and Washington Blvd will be removed. In their place, the Modified Downtown Corridor project will have shared bus/bike lanes similar to those that are currently in place on Washington between Ince and Robertson/Higuera. On most of the corridor, the shared bus/bike lanes will feature vertical and horizontal lane separators to keep cars out.

The decision to recommend shared bus/bike lanes for the Modified Corridor was not taken lightly, but ultimately it was informed by the fact that the existing project contains several sections of shared bus/bike lanes (both protected and unprotected) and that in almost three years of operation, no incidents or conflicts have been reported between buses and bikes in those segments. The buses that run in shared bus/bike lanes are driven by professional bus operators who are trained to safely share space with bikes.

Some people have reported issues seeing or using bike signals at some locations on the corridor. At those locations, we will be adding smaller, human-scale “bike buddy” signals at the near side of the intersection to better communicate when it is safe to proceed.

## **What will happen to blue-painted curb extensions and asphalt art?**

Asphalt art located inside curb extensions will be removed. The intended life expectancy of these elements is one year. Most existing curb extensions will be retained in slightly different shapes and sizes to accommodate the new lane configuration. They will be painted with a solid blue coat to demarcate them from the surrounding roadway and lined with vertical delineators to prevent illegal parking.

The paint that will be applied to the Modified Corridor is slightly different from what is currently installed and was chosen by the City following a successful test of over two years with minimal fading, chipping, or peeling.

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## **I have another question about the design.**

[View the Modified Corridor plans on the MOVE Culver City website.](#) The contractor will use these plans to implement the project, so they are the most accurate source of information about the new design. If you have other questions, please [reach us on the MOVE Culver City contact page](#) and we will be happy to assist you.

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# City Council Awards Construction Contract for MOVE Culver City Modifications, Sidewalk Business Fees, Municipal Code Revisions

City Council Awards Construction Contract for MOVE Culver City Modifications

Stephen Hadjiant, Culver CityObsever Editor & Publisher | Jan 01, 2024

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The MOVE [Culver City](#) project will see modifications in the coming months as City Council approved a contractor's bid on the planned work. Modifications will merge the bike and bus lane into one along the downtown corridor portion of the pilot project. In a 3 to 2 vote, the City Council awarded the contract to Sterndahl Enterprises LLC for \$1,465,075. Vice Mayor Dan O'Brien, Council Members Albert Vera and Goran Eriksson voted in favor of the motion. Mayor Yasmine-Imani McMorris and Council Member Freddy Puza voted against. The modifications, which were initially approved in September 2023, were put on hold when City Council rejected the only proposed bid in November. Following that meeting, the City received three other bids.

The city faces a lawsuit filed October 17th alleges the City of [Culver City](#) and City Council do not have the authority to modify the pilot project as it exists today, including challenging the legal validity of finding the modifications exempt from CEQA.

Separately, the City Council unanimously approved traffic engineering services for the Robertson Boulevard Bike Lane project for \$91,000 with Willdan Engineering. The services will develop construction plans, specifications, and estimates to construct a separated bikeway and a bus only lane or bus bays along Robertson Boulevard between Venice Boulevard and Washington Boulevard. Following that vote, the City Council also unanimously approved traffic engineering services for the Culver Boulevard Bike Lane Project for \$113,455 with Michael Baker International. The services will develop construction plans, specifications, and estimates to construct a bike lane between Duquesne Avenue and Elanda Street.

#### Sidewalk Business Permit Fees Discussed

The City Council adopted a resolution establishing sidewalk business permit fees in a 4 to 1 vote. Examples of sidewalk businesses include vendors selling fresh cut fruit, water, or bagged snacks. Staff recommended several options and recommended a proposed permit fee of \$150, reflecting the average permit fee of those in several other communities recently surveyed. In addition to the new sidewalk vendor permit fees, the sidewalk businesses will be required to pay other associated annual business taxes and fees, including a flat business license tax of \$120, an annual business license application fee of \$77 for new applications or \$67 for renewal applications, and \$4 State mandated Certified Access Specialist fee. Sidewalk vendors are also required to obtain adequate insurance as determined by the City to protect the City from liability associated with the sidewalk vendor's activities. The currently recommended insurance limits for the sidewalk vending program are \$1 million for each occurrence or \$2 million in the aggregate while naming the City as an additional insured. An average insurance policy with the recommended limits could cost the microenterprises in the range of \$660 to \$2,500 annually.

Revisions to [Culver City](#) Municipal Code to be Revisited

The City Council voted to table revisions to subchapters in the [Culver City](#) Municipal Code (CCMC) focused on Parks, Public Buildings and Property. The process of revisions began back in 2018. While City Council agreed to adopt several revisions, including definitions and sections, as well as clarifying procedures and authority for permits and agreements, and a list of prohibited activities, there was concern voiced about the language regarding gender and bathrooms. City Council Members unanimously agreed that the current prohibition on use of restrooms and washrooms designated for the opposite sex should be removed, however, there was no consensus on what language to add to ensure that people of all types of gender identity felt welcome in park restrooms. Council unanimously voted to receive feedback from the Equity and Human Relations Advisory Committee on suggested language. The issue will likely return for a vote later this spring. You can read the proposed revisions [online](#).

#### Dr. Martin Luther King Jr. Celebration Committee Established

The [Culver City](#) adopted a resolution to establish the Martin Luther King Jr. Celebration Committee and approved the committee bylaws. It will be comprised of seven people appointed by the City Council. Each member would serve a four-year term with the exception of the newly formed Committee which will have some members serve a longer term to allow for staggering of terms. The committee will be tasked with assisting in the planning and promotion of the annual MLK Jr. Celebration Event. It is expected the committee will be able to hold its first meeting in July. You can watch the video from this year's Dr. MLK Jr. event on the City's YouTube channel.

#### City Council Passes on Administrative Interns

After discussion, the City Council did not take action on the use of administrative interns to support City Council efforts. A presentation by City staff highlighted the options and requirements of utilizing paid or unpaid interns to assist City Council members. Ultimately none of the City Council Members moved forward with a motion, due to various concerns.

#### Ordinance Introduced Modifying Certain Portions of the R1 Single Family Zoning Code

City Council changed certain language in the City's zoning code regarding single-family dwelling units. The language revisions are necessary to comply with a court order and be consistent with Senate Bill 330. City Council voted unanimously to introduce the ordinance. The City Council must vote at a second City Council meeting to adopt the ordinance before it becomes permanent. You can read the specific language of the repealed portions of the ordinance, as well as items to be reintroduced [online](#).

#### City Council Appoints 3 to Committees

After receiving 13 applications for vacant positions on the Finance Advisory Committee (FAC), the City Council unanimously appointed two people, Vikram Thakur and Lee Austin will join the committee for partial terms. They fill the Business Member Seat No. 5 and Resident Seat No. 2 vacancies, respectively. Lila Bragard was appointed to the vacant Student Seat on the Bicycle and Pedestrian Advisory Committee. All three terms will end June 30, 2024.

#### City Council issued a Proclamation Recognizing February 4th as World Cancer Day and Other Highlights

The City Council began the meeting with a presentation of a proclamation recognizing February 4th, 2024 as World Cancer Day. World Cancer Day aims to promote research, prevent cancer, improve patient services, raise awareness and mobilize the global community to make progress against cancer. World Cancer Day's three-year theme from 2022-2024 is "Close the Care Gap," and is all about raising awareness of the equity gap that affects so many with cancer and recognizing the power of working together. There are now 19.3 million new cases of cancer in a year, and 10 million people died of cancer in 2021 worldwide. Up to 3.7 million lives could be saved each year through resource appropriate strategies for prevention, early detection, and timely and quality treatment. Progress is possible. Thirty to 50% of all cancer cases are preventable and 27% of cancers relate to tobacco and alcohol use. Today, there are 43.8 million people alive within 5 years of a cancer diagnosis, because investment, information, diagnostics, and treatments continue to improve the chance of surviving cancer. [Culver City](#) applauds those organizations in [Culver City](#) and beyond, who provide leadership on policies, investments, and innovation who work towards a future where people live healthier lives and have better access to health and cancer services, no matter where they are born, grow, age, work or live.

- Approval of amendment to an agreement with MGE Engineering for \$162,977 for final engineering design services for the Bridge Preventative Maintenance Program of three bridges over the Ballona Creek Channel including the Washington Boulevard, Overland Avenue, and Duquesne Avenue bridges. City Council also approved amendments in an additional amount of \$24,447 for unexpected costs, as well as appropriating \$137,443 in federal funds.
- Adopted a resolution approving the salary schedules for the [Culver City](#) Fire Management Group (FMG) and the [Culver City](#) Firefighter's Association (FFA). The increase is 1.5%, an increase that is required by the voter mandated Salary Initiative Ordinance. Learn more about the Salary Initiative Ordinance in the staff report to the item.
- Approved a software license agreement with ESRI for \$120,000 to support the City's Geographic Information Systems (GIS) program.
- Approved an application for \$93,880 in grant funds from the California Office of Traffic Safety, Selective Traffic Enforcement Program (STEP) through Fiscal Year 2025.
- Approved of application from United Independent Taxi Cooperative, Inc. to obtain taxicab business operating permit in [Culver City](#). The City currently has no taxicab companies with a valid Taxicab Business Permit.
- Awarded construction contract to Palp, Inc. [dba](#) Excel Paving for \$213,935.40. The contract is for the Washington Boulevard – Ince to Higuera Pavement Rehabilitation Project. The work consists of removing and replacing 2 inches of deteriorated asphalt concrete with new rubber hot mix asphalt. The modified Move [Culver City](#) striping layout will be applied to the street following resurfacing. The approval allows for \$21,393 to cover contingency costs.
- Received and accepted the Fiscal Year 2022-2023 Annual Reporting of Development Impact Fees per the State of California Mitigation Fee Act. City Council also adopted the resolution making the necessary five-year findings for the New Development Impact Fee, Art in Public Places Program In-Lieu Fee, and the Residential Development Park Dedication In-Lieu Fee.
- Approved an agreement with Inyo Networks Inc ([dba](#) Onward), to install network infrastructure and internet communication services to support city-provided public Wi-Fi and internet connectivity for municipal operations utilizing the City's Municipal Fiber Network (Culver Connect) for \$64,000.

The City Council adjourned in memory of Dexter Scott King, son of Rev. Dr. Martin Luther King, Jr. and Coretta Scott King, who died on Monday.

Additional information about each of the topics heard at the City Council meeting can be found in the staff reports and backup attachments for the items, which are posted along with the agenda to the City's website. The video of the City Council meeting will be made available on the City's website for viewing.

The City Council's next meeting is scheduled for Monday, February 12th.

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## **EXHIBIT 3**



## November 5, 2024 General Municipal Election

### OFFICIAL QUALIFIED CANDIDATES

List of Names and Provided Contact Information

In the order in which candidates will be listed on the ballot.

| Name                                                                                                                                                                                                                                                                                                                      |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Bryan "Bubba" Fish</b><br>Campaign Manager: Olga Lexell<br>Campaign Treasurer: Cine Ivery<br>Campaign Mailing Address: 8611 Washington Blvd, Ste 8619, Culver City, CA 90232<br>Email Address: <a href="mailto:hey@voteforbubba.com">hey@voteforbubba.com</a>                                                          |
| <b>Yasmine-Imani McMorris</b><br>Campaign Managers: Portia Allen-Kyle<br>Campaign Treasurer: Cine Ivery<br>Campaign Mailing Address: 1 W. Manchester Blvd, Suite 700, Inglewood, CA 90301<br>Email Address: <a href="mailto:team@mcmorrisforculvercity.com">team@mcmorrisforculvercity.com</a><br>Telephone: 424.326.3824 |
| <b>Adrian M. Gross</b><br>Campaign Manager: Daniel Jimenez<br>Email Address: <a href="mailto:AdrianGrossForCulver2024@gmail.com">AdrianGrossForCulver2024@gmail.com</a>                                                                                                                                                   |
| <b>Denice Renteria</b><br>Campaign Manager and Campaign Treasurer: Richard Martin<br>Campaign Mailing Address: 10866 Washington Blvd. #73, Culver City, CA 90232<br>Email Address: <a href="mailto:denice@renteriaforculvercity.com">denice@renteriaforculvercity.com</a><br>Telephone: 310.616.4107                      |
| <b>Nancy Barba</b><br>Campaign Managers: Disa Lindgren and Michelle Weiner<br>Campaign Treasurer: Cine Ivery<br>Campaign Mailing Address: 1 W. Manchester Blvd, Suite 700 Inglewood, CA 90301<br>Email Address: <a href="mailto:vote4Barba@gmail.com">vote4Barba@gmail.com</a><br>Telephone: 424.319.7163                 |
| <b>Albert Vera</b><br>Campaign Manager: Brian Ross Adams<br>Campaign Treasurer: Jen Cooper<br>Campaign Mailing Address: 5518 Sepulveda Blvd, Culver City, CA 90230<br>Email Address: <a href="mailto:info@veraforcouncil.com">info@veraforcouncil.com</a><br>Telephone: 310.694.2988                                      |
| <b>Jeannine Wisnosky Stehlin</b><br>Campaign Manager: Danielle Cendejas<br>Campaign Treasurer: Gary Crummit<br>Campaign Mailing Address: 10736 Jefferson Blvd., #268, Culver City, CA 90230<br>Email Address: <a href="mailto:jeannine4culvercity@gmail.com">jeannine4culvercity@gmail.com</a><br>Telephone: 424.209.8868 |

## **EXHIBIT 4**

## Ellis F. Raskin

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**From:** Ellis F. Raskin  
**Sent:** Tuesday, September 3, 2024 9:33 AM  
**To:** Velyvis, Stephen E.; Eliason, Caitlin  
**Subject:** Friends and Families for MOVE Culver City -- Ex Parte Notice

Steve and Caitlin,

Please take notice that on Wednesday, September 4, 2024, at 8:30 a.m., or as soon thereafter as counsel may be heard, in Department 15 of the above-captioned Court, located at Stanley Mosk Courthouse, 111 N. Hill Street, Los Angeles, California, Petitioner/Plaintiff Friends and Families for MOVE Culver City ("Petitioner"), will apply ex parte (1) for an order staying enforcement of the Court's statement of decision and judgment pending the outcome of an appeal filed by Petitioner or, in the alternative, (2) for an order staying enforcement of the Court's statement of decision and judgment pending the outcome of the November 5, 2024 election.

Please let me know if the City intends to oppose this application.

**Ellis F. Raskin**

**Partner**

ERaskin@hansonbridgett.com

Direct: (415) 995-5835



**Hanson Bridgett LLP**

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