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5 Attorney for 51 OWNER DEFENDANTS  
(Listed on Appendix A)

6 Counsel for additional OWNER DEFENDANTS  
7 as Listed on Signature Page

8 UNITED STATES DISTRICT COURT  
9 CENTRAL DISTRICT OF CALIFORNIA

10 INDEPENDENT LIVING CENTER  
11 OF SOUTHERN CALIFORNIA, a  
California non-profit corporation; et  
12 al.,

13 Plaintiffs,

14 v.

15 CITY OF LOS ANGELES,  
CALIFORNIA, a California municipal  
16 corporation; COMMUNITY  
REDEVELOPMENT AGENCY OF  
17 THE CITY OF LOS ANGELES, et al.,

18 Defendants.

Case No. 12-CV-00551 FMO (PJWx)

NOTICE OF MOTION AND JOINT  
MOTION OF RULE 19 OWNER  
DEFENDANTS FOR JUDGMENT  
ON THE PLEADINGS

Hearing Date: November 2, 2017  
Time: 10:00 a.m.  
Courtroom: 6th Floor, Courtroom 6D  
Judge: Hon. Fernando M. Olguin

19  
20 **TO PLAINTIFFS AND THEIR ATTORNEYS OF RECORD:**



1 WARNE LAW FIRM,  
2 A PROFESSIONAL CORPORATION

*s/ Theresa L. Kitay*

Theresa L. Kitay (SBN 237311)  
Attorney at Law

*s/ Christopher P. Warne*

3 By: Christopher P. Warne (SBN 246479)

Attorney for Owner Defendants  
4 listed in Appendix A

Attorneys for 105 East I Street, LP

5 LARA & DAVIS LLP

*s/ Roberto Lara*

6 Roberto Lara (SBN 193741)

*s/ John R. Benson*

7 John R. Benson (SBN 240855)

8 Attorneys for New Tierra del Sol, LP and  
4651 Huntington, LP

Attorney for 901 South Broadway Street  
LP

10 BAKER, KEENER & NAHRA, LLP

BAIRD HOLM

11 By: *s/ Phillip A. Baker*

12 Phillip A. Baker (SBN 169571)  
Derrick S. Lowe (SBN 267998)

*s/ Scott P. Moore*

13 Scott P. Moore (Admitted *pro hac vice*)

14 Attorneys for Penny Lane Centers

Attorneys for Amistad Plaza, LP

15 RUTAN & TUCKER, LLP

16 By: *s/Mark J. Austin*

Mark J. Austin (SBN 208880)

17 Attorneys for Imani Fe, LP, a California  
18 limited partnership

**APPENDIX A**

**RULE 19 OWNER DEFENDANTS REPRESENTED**

**BY THERESA L. KITAY, ATTORNEY AT LAW:**

1. 505 Bonnie Brae Partners, LP
2. Adams 935, LP
3. AMCAL Montecito Fund, LP
4. Andalucia Senior Apartments, LP
5. Ardmore 959 Partners, LP
6. Asturias Senior Apartments, LP
7. B S Broadway Village II, LP
8. Behringer Harvard NoHo, LLC
9. Buckingham Senior Apartments, LP
10. Cantabria Senior Apartments, LP
11. Carondelet Court Partners, LP
12. Casa Rampart, LP
13. Central Village Apartments, LP
14. Decro Orion Apartments, LP
15. Decro Osborne Apartments, LP
16. East LA Community Corporation
17. Eastside Village, LP

- 1 18. Esperanza Community Housing Corporation
- 2 19. Eugene Hotel, LP
- 3 20. FAME West 25th Street, LP
- 4 21. Far East Building, LP
- 5 22. 12129 El Dorado Avenue,, LP
- 6 23. Grandview Nine, LP
- 7 24. Hart Village, LP
- 8 25. Heavenly Vision Senior Housing, LP
- 9 26. Hobart Heights Partners, LP
- 10 27. Hoover Seniors
- 11 28. Las Margaritas, LP
- 12 29. Los Angeles Housing Partnership, Inc.
- 13 30. Los Cuatro Vientos, LP
- 14 31. Morgan Place, LP
- 15 32. New Genesis Apartments, LP
- 16 33. NoHo Senior Villas, LP
- 17 34. O L Hope, L.P.
- 18 35. P G Housing Partners, LP
- 19 36. Palm Village Senior Housing Corp.
- 20 37. Palomar Apartments, LP

- 1 38. Redrock Noho Residential, LLC
- 2 39. Renato Apartments, LP
- 3 40. Rittenhouse Limited Partnership
- 4 41. Selma-Hudson Community Limited Partnership
- 5 42. Seven Maples, LP
- 6 43. Sherman Village Apartments, LP
- 7 44. Sherman Way Community Housing, LP
- 8 45. Stovall Housing Corporation
- 9 46. Vermont Seniors
- 10 47. WA Court, LP
- 11 48. Watts/Athens Preservation XVII, LP
- 12 49. West Angeles Villas, LP
- 13 50. Western/Carlton II, LP
- 14 51. Yale Terrace, LP

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 5, 2017, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the email addresses denoted on the Notice of Electronic Filing.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

*s/ Theresa L. Kitay*

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Theresa L. Kitay (CA SBN 237311)  
Attorney at Law

Attorney for Owner Defendants listed in  
Appendix A