

From: Robert Silverstein <robert@robertsilversteinlaw.com>
Sent time: 06/15/2020 12:14:25 PM
To: Mindy Nguyen <Mindy.Nguyen@lacity.org>; Veronica Lebron <Veronica@robertsilversteinlaw.com>
Cc: Vince Bertoni <vince.bertoni@lacity.org>; Dan Wright <Dan@robertsilversteinlaw.com>; Esther Kornfeld <Esther@robertsilversteinlaw.com>; Naira Soghatyan <Naira@robertsilversteinlaw.com>
Subject: ("DEIR"); Case Number ENV-2018-2116-EIR; State Clearinghouse Number 2018051002
Attachments: Attachment0 Attachment1 Attachment2 Attachment3 Attachment4 Attachment5 Attachment6

Ms. Nguyen:

The City has no discretion to refuse to include what we have sent to the administrative record in this clearer version. To not include it will be to violate the administrative record preparation requirements pursuant to AB 900, and will cause delay to what will no doubt be litigation in this matter.

The City does, however, have an option, which we have proposed and do not object to. That is to replace/substitute the second version that we sent for the first.

The first has various portions that are not legible and/or word searchable. That will be a detriment to others and to the reviewing court. The second does not have that problem.

Moreover, the City is required to respond to every objection contained in the original Millennium administrative record and reference library, pursuant to our incorporation of them and demand for same via our June 1, 2020 letter. That will be harder for the City to do with the original version. If the City chooses not to: (1) replace; and (2) respond to the objections contained in the clearer version, it and the "Hollywood Center" developer do so at their own peril.

We also note that the City itself (inadequately) attempted to correct illegible portions of the Draft EIR related to App. G-1. Replacing one for the other is something the City knows how to do when it wants.

We renew our request that you either upload the second/clearer version, or replace the first version with the second; the second option eliminates your claimed concern about "the size of the materials provided."

Please advise by no later than **June 18, 2020** so that we can, depending on your further response, note this as another CEQA violation by the City.

As always, please include this email in the administrative record for this matter. Thank you.

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From: Mindy Nguyen <Mindy.Nguyen@lacity.org>

To: Veronica Lebron <Veronica@robertsilversteinlaw.com>
CC: Vince Bertoni <vince.bertoni@lacity.org>, Dan Wright <Dan@robertsilversteinlaw.com>, Esther Kornfeld <Esther@robertsilversteinlaw.com>, Robert Silverstein <Robert@robertsilversteinlaw.com>
Date: 6/15/2020 11:51 AM
Subject: Re: Inclusion of Original Millennium Case Administrative Record for Hollywood Center Project Draft Environmental Impact Report ("DEIR"); Case Number ENV-2018-2116-EIR; State Clearinghouse Number 2018051002

Hi Veronica,

Thank you for your email. Due to the size of the materials provided, it is the City's position that copies of the same materials will not be uploaded.

Regards,

On Fri, Jun 12, 2020 at 6:11 PM Veronica Lebron <Veronica@robertsilversteinlaw.com> wrote:

Dear Ms. Nguyen:

In our May 20, 2020 letter to you (attached here for your convenience), we submitted for inclusion in the Hollywood Center project's administrative record a better version of the entire administrative record and reference library of emails from the StopTheMillenniumHollywood.com vs. City of Los Angeles, et al. (LASC Case No. BS144606; Court of Appeal Case No. B282319; CA Supreme Court Case No. S258643) litigation. We sent to you by overnight delivery a flash drive with the full bates-stamped administrative record and full bates-stamped reference library from the original Millennium case administrative record. As of the writing of this email, we see that it has not been uploaded, and demand that you do so in order to ensure readability and searchability.

Please confirm that you have done so by no later than June 16, 2020.

Thank you.

Veronica Lebron
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Mindy Nguyen
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