

# Channel Law Group, LLP

---

8200 Wilshire Blvd.  
Suite 300  
Beverly Hills, CA 90211

Phone: (310) 347-0050  
Fax: (323) 723-3960  
www.channellawgroup.com

JULIAN K. QUATTLEBAUM, III \*  
JAMIE T. HALL \*\*  
CHARLES J. McLURKIN

Writer's Direct Line: (310) 982-1760  
jamie.hall@channellawgroup.com

---

\*ALSO Admitted in Colorado  
\*\*ALSO Admitted in Texas

May 4, 2018

## VIA ELECTRONIC MAIL

ROBERT MAHLOWITZ, DEPUTY CITY ATTORNEY  
Office of the City Attorney  
Real Property and Environment Division  
City of Los Angeles  
200 N. Main Street, Room 701  
Los Angeles, CA 90012  
Robert.Mahlowitz@lacity.org

**Re: Demand for Issuance of Stop Work Order for 2239 Laurel Canyon Boulevard (Council File No. 17-0415); (*Laurel Canyon Association v. City of Los Angeles et al.* (Case No. BS173088)).**

Dear Bob:

As you know, this firm represents the Laurel Canyon Association (“LCA”) with respect to the development at 2239 Laurel Canyon Boulevard (“Project”). LCA filed an appeal of the environmental determination for the tree removal permit issued by the City of Los Angeles. This appeal was filed on April 12, 2017 pursuant to Public Resources Code Section 21151(c) and has been pending before the Public Works and Gang Reduction Committee for almost 13 months. Despite this fact, the City has allowed the developer to proceed with construction of the proposed Project. The protected trees have been removed, extensive grading has occurred and retaining walls erected. The City unambiguously stated to LCA’s representatives that the filing of a CEQA appeal does not stay the project approvals (i.e. tree removal permit, building permit, grading permit, etc.) and that the applicant was allowed to proceed (albeit at their own risk) during the pendency of the CEQA appeal.

Yet, on or about May 2, 2018, the City issued a Notice of Intent to Revoke and Stop Work Order for a single family home at 3314 N. Lugano Place, Los Angeles, CA. The applicant had started grading while a CEQA appeal was pending. The City indicated in the Stop Work Order that the building permits for the project were issued “prematurely” because the CEQA

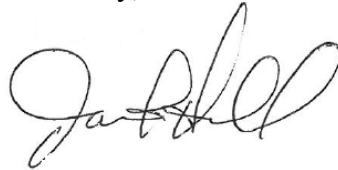
appeal was still pending. The assigned staff person told the applicant that “[u]ntil such action is taken by the City Council, there should be no construction activity until the entire process has been completed.”

The City cannot have it both ways. Either the filing of a CEQA appeal prevents an applicant from proceeding with a project during the pendency of an appeal or it does not. The City cannot treat similarly situated parties differently. The Federal Equal Protection Clause (U.S. Const., 14th Amend.) and its California counterpart (Cal. Const., art. I, § 7, subd. (a)) provide that persons who are similarly situated with respect to the legitimate purpose of a law must be treated alike under the law. (*Cleburne v. Cleburne Living Center, Inc.* (1985) 473 U.S. 432, 439 [87 L. Ed. 2d 313, 105 S.Ct. 3249]; *Cooley v. Superior Court* (2002) 29 Cal.4th 228, 253 [127 Cal. Rptr. 2d 177, 57 P.3d 654].)

Thus LCA hereby rightfully demands that the City issue a Stop Work Order for the illegal project at 2239 Laurel Canyon Boulevard before more damages occur. Otherwise, the City is violating the equal protection rights of my client. My client will amend its Verified Petition for Writ of Mandate to add a cause of action for violation of its equal protection rights if the City does not rectify this situation (*Laurel Canyon Association v. City of Los Angeles et al.* (Case No. BS173088)).

I may be contacted at 310-982-1760 or at [jamie.hall@channellawgroup.com](mailto:jamie.hall@channellawgroup.com) if you have any questions, comments or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "Jamie T. Hall". The signature is fluid and cursive, with the first name "Jamie" being the most prominent part.

Jamie T. Hall

cc: Ted Jordan, Public Works General Counsel  
Emma Howard, Council District 4  
Andrea Leisy, Remy Moose Manley LLP  
Kevin James, President – Board of Public Works  
Victor Cuevas, LADBS Permit and Engineering Bureau, Assistant Chief