1	CHRISTI HOGIN, State Bar No. 138649 City Attorney, City of PALOS VERDES ESTA TARQUIN PREZIOSI, State Bar No. 198014	ΓES
2	JENKINS & HOGIN, LLP	
3	Manhattan Towers 1230 Rosecrans Avenue, Suite 110	
4	Manhattan Beach, CA 90266	Exempt from fees pursuant to
5	Tel: (310) 643-8448; Fax: (310) 643-8441	Government Code § 6103
7	Attorneys for Respondents/Defendants, City of Palos Verdes Estates and the City Council of the City of Palos Verdes Estates	
8	SUPERIOR COURT OF THE	STATE OF CALIFORNIA
9	FOR THE COUNTY O	
10	FOR THE COUNTY	OF LOS ANGELES
11 12	CITIZENS FOR ENFORCEMENT OF PARKLAND COVENANTS, an	CASE NO. BS142768
	unincorporated association; JOHN	Assigned to Hon. Barbara A. Meiers,
13	HARBISON, an individual,	Department 12
14	Plaintiffs and Petitioners,	DECLARATION OF SHERI REPP- LOADSMAN IN SUPPORT OF CITY'S
15	V	OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY
16	CITY OF PALOS VERDES ESTATES, a	JUDGMENT
17	municipal corporation; PALOS VERDES HOMES ASSOCIATION, a California	Petition and Complaint Filed: May 13, 2013 Second Amended Complaint
18	corporation,	Filed : June 16, 2014
19	Defendants and Respondents,	
20	ROBERT LUGLIANI and DOLORES A.	
21	LUGLIANI, as co-trustees of THE LUGLIANI TRUST; THOMAS J. LIEB, TRUSTEE, THE VIA PANORAMA TRUST U/DO MAY 2,	
22	VIA PANORAMA TRUST U/DO MAY 2, 2012 and DOES 1 through 20,	
23	.	
24	Defendants and Real Parties in Interest.	
25		
26	-	
27		
28		

DECLARATION OF SHERI REPP-LOADSMAN IN SUPPORT OF CITY'S OPPOSITION

DECLARATION OF SHERRI REPP-LOADSMAN

I, Sheri Repp-Loadsman, declare as follows:

- I am the Planning and Building Director of the City of Palos Verdes Estates ("City"), and have served in this position since March, 2014. In this capacity, I have direct, personal knowledge of the matters set forth herein and could and would competently testify to the same if called by the court to do so.
- 2. Applications for any land use decision within the City are submitted by applicants to the City for its approval under the Palos Verdes Estates Municipal Code ("PVEMC") and also to the Art Jury.
- 3. The Palos Verdes Homes Association and Art Jury (established 1923 as a California non-profit corporation) operate separate and apart from the organizational structure of the City of Palos Verdes Estates. They enforce the deed restrictions established in the early planning and development of the City. These restrictions determine the building setbacks within each lot as well as the type of architecture allowed.
- 4. The Art Jury, comprised of local architects and engineers, reviews all projects within Palos Verdes Estates to determine if the design meets the criteria set forth in the deed restrictions. Any project that modifies the exterior of a building (i.e., additional square footage, window/door changes, roof material change, paint color, etc.), or modifies the landscaping, requires Art Jury review and approval. This process is separate from any City approvals that may be required for a project.
- 5. The City's Parklands Committee is an advisory body to the City Council. It makes recommendations only as to some matters that involve Parklands, and does not have any authority to approve or disapprove an application. Applications for City permits that would impact parklands may or may not be presented to the Parklands Committee depending on the type of permit applied for. For example, encroachment permits or other administrative permits that do not require City Council approval (building permits, demolition permits, etc.) are not presented to the Parklands Committee. In addition, applications for conditional use

permits and specific development plans are presented to the Planning Commission – not the Parklands Committee.

6. The City's permitting authority is limited to issuing permits under the PVEMC. Likewise, the City only enforces violations of the PVEMC. This enforcement is limited to initiating criminal and/or civil actions in the superior court. The City does not enforce private deed restrictions in any way.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed May 14, 2015 in Palos Verdes Estates, California.

Sheri Repp-Loadsman

1	PROOF OF SERVICE		
2	STATE OF CALIFORNIA, COUNTY OF LOS ANGELES		
3 4	I am employed in the County of Los Angeles, State of California. I am over the age of and not a party to the within action; my business address is 1230 Rosecrans Avenue, Suite 110, Manhattan Beach, CA 90266.		
5	On May 15, 2015, I served the foregoing documents described as:		
6 7	DECLARATION OF SHERI REPP-LOADSMAN IN SUPPORT OF CITY'S OPPOSITION TO PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT		
8	on the interested party or parties in this action by placing the original thereof enclosed in sealed envelopes with fully prepaid postage thereon and addressed as follows:		
10	PLEASE SEE SERVICE LIST ATTACHED		
11	VIA EMAIL. I caused such document as described above, to be transmitted via E-Mail to the offices of the addressee(s).		
12	VIA FACSIMILE. I caused such document to be transmitted via facsimile to the offices of the addressee(s).		
14 15	VIA OVERNIGHT DELIVERY. I enclosed the documents in an envelope or package provided by an overnight delivery carrier and addressed to the person(s) at the address(es) stated above. I placed the envelope or package for collection and overnight delivery at a regularly utilized drop box of the overnight delivery carrier.		
16 17 18	X VIA U.S.MAIL. I enclosed the above described documents in a sealed envelope or package addressed to the person(s) listed above or on the attached; caused such envelope with postage thereon fully prepared to be placed in the United States mail at Los Angeles, California.		
19 20	I am readily familiar with the Jenkins & Hogin, LLP's practice of collection and processing correspondence for outgoing mailing. Under that practice it would be deposited with U.S. Postal Service on that same day with postage thereon prepaid at Manhattan Beach, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.		
21 22	X STATE. I declare under penalty of perjury under the laws of the State of California that the above is true and correct.		
23 24	FEDERAL. I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service is made.		
25	Executed this 15th day of May, 2015, at Manhattan Beach, California.		
26 27	Wendy Hoffman WENDY HOFFMAN		
28			

1	SERVICE LIST		
2	Jeffrey Lewis	Attorneys for Petitioner	
3	Kelly Broedlow Dunagan BroedlowLewis LLP	Citizens for Enforcement of Parkland Covenants	
4	734 Silver Spur Road Suite 300	Via Hand Delivery	
5	Rolling Hills Estates, CA 90274 Tel: (310) 935-4001		
6	Fax: (310) 872-5389 <u>Jeff@BroedlowLewis.com</u>		
7			
8	Terry Tao Scott J. Sachs	Attorneys for Respondent Palos Verdes Peninsula Unified School	
9	Atkinson, Andelson, Loya, Ruud & Romo 12800 Center Court Drive	District	
10 11	Suite 300 Cerritos, CA 90703 Tel: (562) 653-3000		
12	Fax: (562) 653-3333 TTao@AALRR.com		
13	SSachs@AALRR.com		
14	Sidney F. Croft	Attorney for Respondent	
15	LAW OFFICE OF SIDNEY CROFT 314 Tejon Place	Palos Verdes Homes Association	
16	Palos Verdes Estates, CA 90274 Tel: (310) 849-1992		
17	SFCroftLaw@aol.com		
18	LEWIS BRISBOIS BISGAARD & SMITH LLP Daniel V. Hyde	Attorneys for Respondent Palos Verdes Homes Association	
19	Brant H. Dveirin 221 N. Figueroa Street, Suite 1200 Los Angeles, CA 90012		
20	Tel: (213) 250-1800 Fax: (213) 250-7900		
21	Daniel.Hyde@lewisbrisbois.com Brant.Dveirin@lewisbrisbois.com		
22			
23	Damon P. Mamalakis R.J. Comer	Attorneys for Real Parties in Interest Robert Lugliani and Dolores E. Lugliani, as	
24	Armbruster Goldsmith & Delvac 11611 San Vicente Boulevard	co-trustees of THE LUGLIANI TRUST; THOMAS J. LIEB, TRUSTEE, THE VIA	
25	Suite 900 Los Angeles, CA 90049	PANORAMA TRUST	
26	Tel: (310) 254-9026 Fax: (310) 254-9046		
27	Damon@agd-landuse.com rj@agd-landuse.com		
28			