

Second Civil Number B267816

**In the Court of Appeal  
Of the State of California**  
SECOND APPELLATE DISTRICT  
DIVISION TWO

CITIZENS FOR ENFORCEMENT  
OF PARKLAND COVENANTS, *et al.*,

*Plaintiffs and Respondents,*

v.

CITY OF PALOS VERDES  
ESTATES, *et al.*

*Defendants and Appellants.*

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**JOINDER IN THE APPELLANTS' OPENING BRIEFS  
OF THE PALOS VERDES HOMES ASSOCIATION  
AND THE CITY OF PALOS VERDES ESTATES**

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Appeal from the Superior Court of the State of California,  
For the County of Los Angeles,  
Los Angeles Superior Court Case No. BS142768  
Honorable Barbara A. Meiers, Judge

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**JOINDER AND ADOPTION BY REFERENCE**

Pursuant to rule 8.200(a)(5) of the California *Rules of Court*, defendants and appellants Robert Lugliani, Dolores A. Lugliani, Thomas J. Lieb, and The Via Panorama Trust (the "Luglianis") hereby join and adopt by reference the opening briefs of the appellants Palos Verdes Homes Association and City of Palos Verdes Estates.

The arguments set forth in said appellants' opening briefs are applicable to the Luglianis. The judgment of the trial court must be reversed.

Respectfully submitted,

DATED: November 11, 2016

ARMBRUSTER GOLDSMITH  
& DELVAC LLP

By:



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Damon Mamalakis

*Attorneys for Defendants and Appellants,  
Robert Lugliani, Dolores A. Lugliani,  
Thomas J. Lieb, and The Via Panorama  
Trust*

**CERTIFICATE OF COMPLIANCE**

I, the undersigned, Damon Mamalakis, declare that:

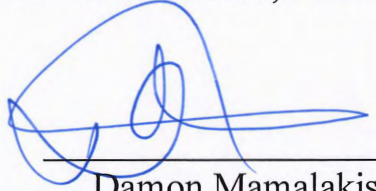
I am a partner in the law firm of Armbruster Goldsmith & Delvac LLP, counsel of record for Attorneys for Defendants and Appellants Robert Lugliani, Dolores A. Lugliani, Thomas J. Lieb, and The Via Panorama Trust.

This certificate of compliance is submitted in accordance with rule 8.204 (c) of the *California Rules of Court*.

This appellant's joinder brief was produced with a computer. It is proportionately spaced in 14 point Times Roman typeface. This brief contains 78 words, including footnotes.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed at Los Angeles, California on November 11, 2016.

  
\_\_\_\_\_  
Damon Mamalakis

**CALIFORNIA STATE COURT PROOF OF SERVICE**

*Citizens for Enforcement of Parkland and Covenants v. City of Palos Verdes Estates* (Case No. Second Civil B267816)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to the action. My business address is 12100 Wilshire Blvd., Suite 1600, Los Angeles, California 90025.

On November 11, 2016, I served the following document(s):  
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Supreme Court

Executed this 11<sup>th</sup> day of November, 2016

s/ Ruby Belyeu  
Ruby Belyeu