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THE SILVERSTEIN LAW FIRM, APC  
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Attorneys for Petitioners  
STOPTHEMILLENNIUMHOLLYWOOD.COM,  
et al.

**SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF LOS ANGELES**

STOPTHEMILLENNIUMHOLLYWOOD.COM  
and COMMUNITIES UNITED FOR  
REASONABLE DEVELOPMENT, California  
unincorporated associations; GEORGE  
ABRAHAMS, individually,

Petitioner,

vs.

CITY OF LOS ANGELES, a municipal  
corporation; LOS ANGELES CITY COUNCIL;  
and DOES 1 through 20, inclusive,

Respondents.

MILLENNIUM HOLLYWOOD, LLC, a  
Delaware limited liability company; and ROES 1  
through 20, inclusive,

Real Party in Interest.

Case No. BS144606

**PETITIONERS' OPPOSITION  
TO RESPONDENTS' MOTION  
FOR ORDERS DISCHARGING  
PEREMPTORY WRIT OF  
MANDAMUS**

Date: February 1, 2022  
Time: 1:30 p.m.  
Dept.: 85

[Hon. James C. Chalfant]

1 Petitioners STOPTHEMILLENNIUMHOLLYWOOD.COM, et al. oppose the City  
2 of Los Angeles’ Motion for Orders Discharging Peremptory Writ of Mandamus. The  
3 City’s return is arguably incomplete, and thus full discharge of the writ may be premature.

4 The third point of the writ (see City’s Fox Decl., Exh. B) commands the City of  
5 Los Angeles and Los Angeles City Council to “Refrain from taking any steps to carry out  
6 the Project approvals until and unless you have fully complied with CEQA, all other  
7 applicable laws, and this writ.” (Id.) The “Project” at issue was named the “Millennium  
8 Hollywood” project, which Petitioners and the public generally referred to as the  
9 “Skyscrapers on the Earthquake Fault” project.

10 Although the City states that Real Party did not elect to pursue the Project, that  
11 statement may be correct in name only, not in substance. Cf. Fontana Redevelopment  
12 Agency v. Torres (2007) 153 Cal.App.4th 902, 912-913 (“Calling the same kind of debts  
13 by different names should not allow Fontana RDA improperly to circumvent the statutory  
14 limitations of the Jurupa Hills redevelopment plan”). A CEQA process, based on a Draft  
15 EIR issued in April 2020, is ongoing for a rebranded “Hollywood Center” project on the  
16 same site, by the same developer principals, that would again<sup>1</sup> develop approximately 1  
17 million square feet – including skyscrapers flanking the iconic Capitol Records Building –  
18 over where the State has mapped branches of the active Hollywood Earthquake Fault.

19 If the rebranded Hollywood Center project and its current EIR process are merely a  
20 different name, as can be argued, for the original Project, then full discharge of the writ  
21 could be deemed premature because that renewed CEQA process is not final; no Final EIR  
22 has yet been considered by the City or City Council, and thus the City cannot come to this  
23 Court showing that it has “fully complied with CEQA . . . .” (Writ [Fox Decl., Exh. B].)

24 Any motion for full discharge should await certification of a Final EIR for the  
25 “Hollywood Center” project, or its unequivocal abandonment.<sup>2</sup>

26 \_\_\_\_\_  
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28 <sup>1</sup> Petitioners recognize that one of the bases on which they prevailed before this  
Court, and the Court of Appeal in Stopthemillenniumhollywood.com v. City of Los

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Dated: January 19, 2022

**THE SILVERSTEIN LAW FIRM, APC**

By:           /s/ Robert P. Silverstein          

ROBERT P. SILVERSTEIN

DANIEL E. WRIGHT

Attorneys for Petitioners

STOPTHEMILLENNIUMHOLLYWOOD.COM,  
et al.

\_\_\_\_\_

Angeles (2019) 39 Cal.App.5th 1, was the lack of an “accurate, stable and finite project description” in the Project’s EIR. However, what Real Party publicly advertised as being the Project in the original case is strikingly similar to what it is pursuing in the pending CEQA process.

<sup>2</sup> In an abundance of caution, Petitioners state that they reserve all rights, including but not limited to filing a supplemental and/or new CEQA petition upon the City’s completion of its current CEQA process.

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**PROOF OF SERVICE**

I, ESTHER KORNFELD, declare:

I am a resident of the state of California and over the age of eighteen years, and not a party to the within action; my business address is The Silverstein Law Firm, 215 North Marengo Ave, Third Floor, Pasadena, California 91101-1504. On January 19, 2022, I served the within document(s):

**PETITIONERS' OPPOSITION TO RESPONDENTS' MOTION FOR ORDERS DISCHARGING PEREMPTORY WRIT OF MANDAMUS**

by transmitting the document(s) listed above via e-mail to the person(s) named below at the respective e-mail addresses and receiving confirmed transmission reports indicating that the document(s) were successfully transmitted.

<b>CASE NAME: STOPTHEMILLENNIUMHOLLYWOOD.COM, ET AL. V. CITY OF LOS ANGELES, ET AL.</b>
<b>CASE No.: BS144606</b>

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

Executed on January 19, 2022, at Pasadena, CA.

*/s/ Esther Kornfeld*  
\_\_\_\_\_  
ESTHER KORNFELD

***SEE ATTACHED SERVICE LIST***

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