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6 *Attorneys for Plaintiffs*

7
8 UNITED STATES DISTRICT COURT
9 CENTRAL DISTRICT OF CALIFORNIA

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11 LA ALLIANCE FOR HUMAN
RIGHTS, *et al.*,

12 Plaintiffs,

13 v.

14 CITY OF LOS ANGELES, *et al.*,

15 Defendants.
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Case No. 2:20-CV-02291-DOC-KES

Assigned to Judge David O. Carter

**LA ALLIANCE FOR HUMAN
RIGHTS' WITNESS LIST FOR
OCTOBER 25, 2024 HEARING**

Before: Hon. David O. Carter
Courtroom: TBD
Hearing Date: October 25, 2024
Hearing Time: 1:00 p.m.

20 LA Alliance for Human Rights respectfully submits the following list of
21 witnesses to be called at the October 25, 2024, evidentiary hearing set by the Court.
22 *See* [ECF No. 795](#). Plaintiff provided notice of the below witnesses, except as noted in
23 footnote 3, on October 17, 2024, the day after the court set the hearing and again on
24 today's date via email. Defendant City confirmed Mr. Szabo's attendance, but is
25 objecting to Mayor Karen Bass and Councilmember Blumenfield. Defendant County
26 did not respond to either email.
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Witness	Topic
Matt Szabo, City Administrative Officer, LA City	City budget and spending allocations; City homelessness programs
LA City Councilmember Bob Blumenfield ¹	Experience on LA City Housing and Homelessness Committee; City budget and spending decisions; recent resolutions on homelessness; City spending on beds and services
LA City Mayor Karen Bass ²	City spending on beds and services; County collaboration; Inside Safe
Fesia Davenport	County budget and spending allocations
LA County Supervisor Lindsey Horvath ³	County Board deliberations and decisions, declarations of emergency, County provision of services
Paul Webster, executive director of LA Alliance for Human Rights ⁴	City, County, State, and Federal funding; spending on beds and services

¹ The City is objecting to request for testimony from Councilmember Blumenfield and Mayor Bass under the Apex doctrine. LA Alliance contends these individuals are crucial to testify to deliberations and decisions being made at executive levels, and they have unique understanding and knowledge of the issues involved.

² The City objects to testimony from Mayor Bass as described *supra*.

³ On Thursday, October 17, counsel for LA Alliance emailed attorneys for the County asking whom from the Board of Supervisors would attend the evidentiary hearing on October 25, as required by the Court. The County did not responded to that email. Counsel for LA Alliance followed up today at 8:47am, requesting confirmation that Supervisor Horvath or some other board member would be present pursuant to the Court's order. Counsel for the County has not responded.

⁴ As needed.

1 Dated: October 22, 2024

Respectfully submitted,

2 /s/ Elizabeth A. Mitchell

3 UMHOFER, MITCHELL & KING, LLP

4 Matthew Donald Umhofer

Elizabeth A. Mitchell

5 *Attorneys for Plaintiffs*

6 4874-6053-3490, v. 1

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