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No Fee ~ Gov't Code § 6103

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

Plated Personal Chef Services, LTD., a
New York corporation dba Saucy Bird,

Petitioner,

vs.

City of Los Angeles, a Municipal
Corporation; The City of Los Angeles
City Council; and Does 1 through 10,
inclusive,

Respondent.

Case No.: 24STCP02773

*Honorable Stephen I. Goorvitch
Department 82*

**Declaration of Fernando Morales in Support
of the City's Opposition to Petitioner's
Preliminary Injunction Motion**

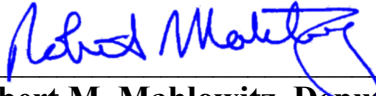
Action Filed: August 28, 2024

Hearing Date: September 25, 2024
Dept. 82
9:30 a.m.

Respondents City of Los Angeles and City Council of Los Angeles submit the following Declaration of Fernando Morales, City of Los Angeles Council District 5, Deputy Chief of Staff in support of the City's Opposition to Petitioner's Motion for Preliminary Injunction.

1 Dated: September 18, 2024

Hydee Feldstein Soto, City Attorney
Valerie Flores, Chief Dep. City Attorney
John W. Heath, Sr. Asst. City Attorney

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4 By: 
5 **Robert M. Mahlowitz, Deputy City Attorney**
6 Attorney for Respondent, CITY OF LOS ANGELES
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1 **DECLARATION OF FERNANDO MORALES**

2 I, Fernando Morales, declare as follows:

3 1. I am employed as Deputy Chief of Staff - Housing/Homelessness, Operations,
4 and Special Projects for the Office of City of Los Angeles Council District Five. I have held
5 this position since December 2022. The facts stated herein are personally known to me, and if
6 called as a witness, I would competently testify to them.

7 2. My Deputy Chief of Staff duties include oversight of all housing and
8 homelessness-related matters, Council District Five operations, and special projects other than
9 land use, environmental, or Los Angeles County Metropolitan Transportation
10 Authority/transportation matters.

11 3. I have been personally involved since December 2022 in our Office’s efforts to
12 establish interim housing within our district, including the work which led to the City
13 Council’s approval in October 2023, of the Midvale Interim Housing Project to serve persons
14 experiencing homelessness. That project is located at the intersection of Pico Blvd and Midvale
15 Avenue. (“Midvale Project”). I continue to monitor the entire Midvale Project.

16 4. In addition, I have been involved in our Office’s work exploring efforts that
17 could create additional public parking in the neighborhood near the Midvale Project, including
18 the following work:

19 a. Exploration of potential public parking lease terms with multiple private
20 property owners within 500-1,000 feet of the Midvale Project location, including owners of the
21 nearby Macy’s structure, Lenny’s Deli, Norm’s, a 99 Cent Store, and the Westside Center.


22 b. Working with staff of the Los Angeles Department of Transportation to
23 explore current anti-gridlock zone needs in the area and how or if current rules could be altered
24 to increase evening parking.

25 c. Investigating a potential contract for valet public parking near the Midvale
26 Shelter site.

27 5. The entire Office and I continue to work to secure additional parking near the
28 Midvale Project and the Office continues to seek community input concerning the matter from

1 the area's neighborhood councils and the area business community.

2 6. I declare under penalty of perjury under the laws of the state of California that
3 the foregoing is true and correct. Executed this 13th day of September 2024, at Los Angeles,
4 California.

5 
6 _____
7 Fernando Morales

1 **PROOF OF SERVICE**

2 I, the undersigned, say: I am over the age of 18 years and not a party to the within
3 action or proceeding. My business address is 200 North Main Street, 701 City Hall East, Los
4 Angeles, California 90012.

5 On September 18, 2024, I served the foregoing documents described as: **Declaration**
6 **of Fernando Morales in Support of the City’s Opposition to Petitioner’s Preliminary**
7 **Injunction Motion** on all interested parties in this action as follows:

8 **SEE ATTACHED SERVICE LIST**

9
10 [] **BY MAIL** – I placed a copy thereof enclosed in a sealed envelope addressed to each
11 addressee stated above. I deposited such envelope for collection, processing and
12 mailing by United States mail by my office in the ordinary course of business. I am
13 readily familiar with the business practice of my office for collection, processing, and
14 mailing of correspondence by the United States mail. Under that practice, it is
15 collected and deposited with first class postage thereon fully prepaid with the United
16 States Postal Service on that same day, at Los Angeles, California. I am aware that on
17 motion of the party served, service is presumed invalid if postage cancellation date or
18 postage meter date is more than one (1) day after the date of deposit for mailing in
19 affidavit; and/or

20 [X] **BY ELECTRONIC MAIL** – I electronically transmitted the document listed above to
21 the email address stated above which has been confirmed for each addressee stated
22 above. My electronic service address is leilany.roman@lacity.org.

23 I declare that I am employed in the office of a member of the bar of this court at whose
24 direction the service was made. I declare under penalty of perjury under the laws of the State
25 of California that the foregoing is true and correct. Executed on September 18, 2024, at Los
26 Angeles, California.

27 

28 _____
Leilany Roman

SERVICE LIST

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