

**OVERSIGHT BOARD OF THE SUCCESSOR AGENCY TO THE GARDEN GROVE
AGENCY FOR COMMUNITY DEVELOPMENT****INTER-DEPARTMENT MEMORANDUM**

To: Matthew J. Fertal
From: Kingsley Okereke
Dept: Director
Dept: Finance
Subject: ADOPTION OF A RESOLUTION REGARDING A JUDGMENT ISSUED BY THE ORANGE COUNTY SUPERIOR COURT IN COURT CASE NO. 30-2009 00291597 *MARINA LIMON, ET AL. V. GARDEN GROVE AGENCY FOR COMMUNITY DEVELOPMENT*
Date: November 12, 2014

OBJECTIVE

The purpose of this report is to request that the Oversight Board of The City of Garden Grove as Successor Agency to the Garden Grove Agency for Community Development ("Oversight Board") consider and adopt the attached Resolution relating to that certain "Stipulation to Substitute Party and for Entry of Interlocutory Judgment" ("Judgment") issued by the Orange County Superior Court in Court Case No. 30-2009-00291597, *Marina Limon, et al. v. Garden Grove Agency for Community Development* ("Limon Action"). The State Department of Finance ("DOF") issued the initial decision letter on November 7, 2014 for the 14-15B Recognized Obligation Payment Schedule ("ROPS"), which lists and requests funding to implement the Judgment. The DOF letter denied the funding and directed the Oversight Board to review and take action on the Judgment.

BACKGROUND/DISCUSSION

The *Limon Action* was initiated in August 2009; the Plaintiffs' primary allegations were against the former Garden Grove Agency for Community Development ("Former Agency") relating to relocation assistance and benefits to prior occupants of the former Travel Country RV Park and replacement and inclusionary/production affordable housing issues, all of which were associated with the Water Park Hotel Project, a DOF-approved enforceable obligation; and, as such, the Limon Action is also an enforceable obligation. The Limon Action was resolved after court-ordered mediation and settlement conferences that resulted in the April 2014 Judgment approved by the Court. (Attachment 2.)

The Judgment includes various obligations and conditions to funding through the "Dissolution Act" (Part 1.85 of Division 24 of the Health and Safety Code) process, including, without limitation, the following:

- The amounts the Successor Agency is obligated to pay pursuant to the terms of the Judgment are to be included as an enforceable obligation of the Successor Agency on certain applicable ROPS.
- Under the Judgment for ROPS 14-15B, (i) full amount of the relocation assistance due to the Limon Action plaintiffs, and (ii) the full amount of attorneys' fees for plaintiffs' counsels (\$795,000 plus 7% interest from date of Judgment) were required to be listed on 14-15B ROPS and submitted to DOF by October 3, 2014. The Successor Agency listed both items on ROPS 14-15B and the Oversight Board approved ROPS 14-15B in September 2014. The DOF's November 7, 2014 decision letter on ROPS 14-15B states the Judgment itself is to be reviewed and approved by the Oversight Board.
- The Successor Agency is to list on ROPS 15-16B amounts for certain replacement housing units so that development of such units can be completed four years from entry of the Judgment.
- The Judgment provides that the obligations are of the Former Agency (not the City or Housing Authority) that arose prior to enactment of the Dissolution Act; thus, the Successor Agency's liability for amounts owed under the Judgment are limited to funding provided through the Redevelopment Property Tax Trust Fund(RPTTF), and subject to the ROPS process and the value of assets received by the Successor Agency and the Housing Successor; and the Successor Agency is required to list the obligations of the Judgment on all ROPS until all obligations are satisfied.

Pursuant to Section 34173(g), "[a]ll litigation involving a redevelopment agency shall automatically be transferred to the successor agency"; and, under Section 34171(d)(1)(D) and (F) a court judgment and litigation expenses are expressly included in the definition of "enforceable obligation", as follows:

"(D) Judgments or settlements entered by a competent court of law or binding arbitration decisions against the former redevelopment agency, ..."

"(F) ...agreements concerning litigation expenses related to assets or obligations, settlements and judgments, ...".

The Judgment is an order of the Superior Court, County of Orange to the Successor Agency; and, while the Successor Agency has taken the actions required for ROPS 14-15B pursuant to the Judgment, the DOF has directed an additional step not set forth or required in the Judgment, i.e., for the Oversight Board to consider and take action to approve the Judgment. A Resolution approving the Judgment is attached for the Oversight Board's consideration and action in order for the DOF to authorize funding through the ROPS process.

FINANCIAL IMPACT

As an enforceable obligation associated with the Water Park Hotel Project enforceable obligation, the Redevelopment Property Tax Trust Fund (RPTTF) through the ROPS process will fund the cost of the Judgment.

RECOMMENDATION

It is recommended that the Oversight Board:

- Adopt the attached Resolution approving the Judgment issued in Orange County Superior Court Case No. 30-2009-00291597 Marina Limon, et al. v. Garden Grove Agency for Community Development; and
- Authorize the Director to transmit the adopted Resolution with the Judgment to the State Department of Finance, County Auditor-Controller, and County Administrative Officer.


KINGSLEY OKEREKE
Finance Director

By: Jim DellaLunga
Senior Project Manager

Attachment 1: Resolution
Attachment 2: Judgment

Recommended for Approval



Matthew J. Fertal
Director

GARDEN GROVE OVERSIGHT BOARD

RESOLUTION NO.

A RESOLUTION OF THE OVERSIGHT BOARD TO THE CITY OF GARDEN GROVE AS SUCCESSOR AGENCY TO THE GARDEN GROVE AGENCY FOR COMMUNITY DEVELOPMENT APPROVING JUDGMENT ISSUED IN ORANGE COUNTY SUPERIOR COURT CASE NO. 30-2009-00291597 *MARINA LIMON, ET AL. V. GARDEN GROVE AGENCY FOR COMMUNITY DEVELOPMENT*

WHEREAS, the Successor Agency to the Garden Grove Agency for Community Development (“Successor Agency”) is a public body corporate and politic, organized, and operating under Parts 1.8 and 1.85 of Division 24 of the California Health and Safety Code, and the successor of the former Garden Grove Agency for Community Development (“Former Agency”) that was previously a community redevelopment agency organized and existing pursuant to the Community Redevelopment Law, Health and Safety Code Section 33000, *et seq.* (“CRL”);

WHEREAS, Assembly Bill x1 26 (“AB x1 26”) added Parts 1.8 and 1.85 to Division 24 of the California Health and Safety Code and such laws were modified, in part, and determined constitutional by the California Supreme Court in the petition *California Redevelopment Association, et al. v. Ana Matosantos, et al.*, Case No. S194861 (“Matosantos Decision”), which laws and court opinion caused the dissolution of all redevelopment agencies and winding down of the affairs of former redevelopment agencies; thereafter, such laws were amended further by Assembly Bill 1484 (“AB 1484”) and other subsequent legislation (together “Dissolution Act”). All statutory references herein are to the Health and Safety Code of the Dissolution Act unless otherwise stated;

WHEREAS, as of February 1, 2012, the Former Agency was dissolved pursuant to the Dissolution Act and the Successor Agency, as a separate public entity, corporate and politic, administers the enforceable obligations of the Former Agency and otherwise unwinds the Former Agency’s affairs, all subject to the review and approval by a seven-member oversight board (“Oversight Board”);

WHEREAS, Section 34179 provides that the Oversight Board has fiduciary responsibilities to holders of enforceable obligations and the affected taxing entities that benefit from distributions of property tax and other revenues pursuant to Section 34188 of Part 1.85 of the Dissolution Act;

WHEREAS, Section 34177(a) permits the Successor Agency to make payments due for enforceable obligations;

WHEREAS, Section 34177(l) requires the Successor Agency to prepare a Recognized Obligation Payment Schedule (“ROPS”) before each six-month fiscal period that lists its Enforceable Obligations;

WHEREAS, the Former Agency was party defendant/respondent in that certain legal action filed in August 2009 in Superior Court, County of Orange, Case No. 30-2009-00291597, *Marina Limon, et al. v. Garden Grove Agency for Community Development* (“Limon Action”);

WHEREAS, the Plaintiffs' primary allegations in the Limon Action were against the Former Agency relating to relocation assistance and benefits to prior occupants of the former Travel Country RV Park, and replacement and inclusionary/production affordable housing issues, all of which were associated with the Water Park Hotel Project, an enforceable obligation approved by the State Department of Finance ("DOF") pursuant to the Dissolution Act, and, as such, the Limon Action is also an enforceable obligation;

WHEREAS, after court-ordered mediation and settlement conferences the Limon Action was settled and resolved by that certain "Stipulation to Substitute Party and for Entry of Interlocutory Judgment" ("Judgment");

WHEREAS, the Judgment includes various obligations and conditions to funding through the Dissolution Act, in particular funding through the Recognized Obligation Payment Schedule ("ROPS") and the Redevelopment Property Tax Trust Fund ("RPTTF") process, including without limitation the following:

- The amounts the Successor Agency is obligated to pay pursuant to the terms of the Judgment are to be included as an enforceable obligation of the Successor Agency on certain applicable ROPS; and
- Under the Judgment for ROPS 14-15B, (i) full amount of the relocation assistance due to the Limon Action plaintiffs, and (ii) the full amount of attorneys' fees for plaintiffs' counsels (\$795,000 plus 7% interest from date of Judgment) were required to be listed on 14-15B ROPS and submitted to DOF by October 3, 2014.
- The Successor Agency is to list on ROPS 15-16B amounts for certain replacement housing units so that development of such units can be completed four years from entry of the Judgment.
- The Judgment provides that the obligations are of the Former Agency (not the City or Garden Grove Housing Authority) that arose prior to enactment of the Dissolution Act; thus, the Successor Agency's liability for amounts owed under the Judgment are limited to funding provided through the RPTTF and ROPS process and the value of assets received by the Successor Agency and the Housing Successor and the Successor Agency is required to list the obligations of the Judgment on all ROPS until all obligations are satisfied.

WHEREAS, the Successor Agency listed both items ((i) and (ii) in the second bullet point above) on ROPS 14-15B and this Oversight Board approved ROPS 14-15B by Resolution in September 2014;

WHEREAS, the DOF's issued its initial decision letter on November 7, 2014, for ROPS 14-15B, which states the Judgment itself is to be reviewed and approved by the Oversight Board;

WHEREAS, the Judgment is an order of the Superior Court, County of Orange to the Successor Agency, and while the Successor Agency has taken the actions required for ROPS 14-15B pursuant to the Judgment, the DOF has directed this additional step not set forth or required in the Judgment, i.e., for the Oversight Board to consider and take action to approve the Judgment;

WHEREAS, the Successor Agency staff has presented the background and information to the Oversight Board about the Limon Action and the Judgment, and by this Resolution the Oversight Board desires to approve the Judgment;

WHEREAS, pursuant to Section 34173(g), “[a]ll litigation involving a redevelopment agency shall automatically be transferred to the successor agency”;

WHEREAS, Pursuant to Section 34171(d)(1)(D) and (F) a court judgment and litigation expenses are expressly included in the definition of “enforceable obligation”:

“(D) *Judgments* or settlements entered by a competent court of law or binding arbitration decisions against the former redevelopment agency, ...

(F) ...agreements concerning litigation expenses related to assets or obligations, settlements and *judgments*, ...” (Emphasis added.); and

WHEREAS, the Oversight Board directs and authorizes the Successor Agency to transmit this Resolution and the Judgment to the State Department of Finance pursuant to the Dissolution Act.

NOW, THEREFORE, BE IT RESOLVED BY THE OVERSIGHT BOARD TO THE CITY OF GARDEN GROVE AS SUCCESSOR AGENCY TO THE GARDEN GROVE AGENCY FOR COMMUNITY DEVELOPMENT:

Section 1. The foregoing recitals are true and correct and constitute a substantive part of this Resolution.

Section 2. The Oversight Board hereby approves the Judgment, a true copy of which is appended to this Resolution as Attachment 1.

Section 3. The Successor Agency is directed to transmit this Resolution with the Judgment to the DOF for review pursuant to Sections 34179(h) and 34181(f) of the Dissolution Act and for DOF’s approval of funding of the obligations pursuant to the Judgment issued by the Superior Court, County of Orange, for funding through the RPTTF for ROPS 14-15B, and for the DOF to provide written confirmation determining the Judgment is an enforceable obligation of the Successor Agency.

Section 4. Pursuant to Section 34179(h), as amended by Assembly Bill 1484, written notice and information about all actions taken by the Oversight Board shall be provided to the DOF by electronic means and in a manner of DOF’s choosing. An Oversight Board’s action shall become effective five (5) business days after notice in the manner specified by the DOF, unless the DOF requests a review.

Section 5. This Resolution shall be effective immediately upon adoption.

Section 6. The Secretary to the Oversight Board shall certify to the adoption of this Resolution.

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE

MARINA LIMON, *et al.*,
Plaintiffs and Petitioners,
v.
GARDEN GROVE AGENCY FOR
COMMUNITY DEVELOPMENT, a municipal
entity, *et al.*,
Defendants and Respondents.

GARDEN GROVE MXD, LLC, and
MCWHINNEY REAL ESTATE SERVICES,
and DOES 21 through 40,
Real Parties in Interest.

Case No. 30-2009-00291597

**STIPULATION TO SUBSTITUTE
PARTY AND FOR ENTRY OF
INTERLOCUTORY JUDGMENT**

Complaint Filed: August 10, 2009
Dept.: CX-102
Judge: Robert J. Moss

Plaintiffs Marina Limon, Alfredo Cordero, Celia Gonzalez, Jackquelyn Bodenstedt as
executor of the Estate of Randolph Maynor, Jose Sanchez, Raymond Kent Creamer, Ana Rosa
Olea, Elidia Gonzalez, Ivan Torres, Javier Ibarra ("Individual Plaintiffs"), and the Kennedy
Commission (collectively, "Plaintiffs"), along with Defendants, the City of Garden Grove, the
City of Garden Grove as Successor Agency to the Garden Grove Agency for Community

1 Development ("Successor Agency"), the Garden Grove Housing Authority as Successor Agency
2 to the Garden Grove Agency for Community Development ("Housing Successor") and the
3 Garden Grove City Council (collectively, "Defendants"), hereby enter into this stipulation to
4 substitute party and for entry of judgment ("Judgment"). Plaintiffs and Defendants (collectively,
5 "Parties") settled the above-captioned matter through Voluntary Settlement Conferences before
6 Judge Gail Andler, Department CX-101, on September 20, 2013 and February 28, 2014. The
7 Parties stipulate as follows:

8 1. On September 20, 2013, the Parties entered into a settlement on the record in open
9 court in Department CX-101 that resolved the above captioned matter conditioned upon the
10 settlement of the issue of attorneys' fees. On February 28, 2014, the Parties reached agreement
11 on attorneys' fees. The terms of the settlement are as follows:

12 2. The term "Low Income Households" shall have the meaning set forth in Health
13 and Safety Code section 50079.5.

14 3. The term "Very Low Income Households" shall have the meaning set forth in
15 Health and Safety Code section 50105.

16 4. The term "Low Income Rent" shall be rent affordable to lower income households
17 as set forth in Health and Safety Code section 50053(b)(3).

18 5. The term "Very Low Income Rent" shall be rent affordable to very low income
19 households as set forth in Health and Safety Code section 50053(b)(2).

20 6. Within the timeframe described in Paragraph 9, below, the Successor Agency or,
21 at its discretion, the Housing Successor (hereinafter "Successors"), shall develop replacement
22 housing. Pursuant to this paragraph funds held in the Low and Moderate Income Housing Asset
23 Fund, as defined in Health and Safety Code section 34176, shall be available for development of
24 the replacement housing pursuant to this Judgment. The Successors shall develop or cause to be
25 developed twenty five (25) additional new construction dwelling units as replacement housing for
26 the Travel Country Recreational Vehicle Park ("Park") to address Plaintiffs' claims for
27 development of replacement housing pursuant to Health and Safety Code section 33413. No less
28

1 than twelve (12) of the units developed pursuant to this paragraph shall be covenanted to be
2 leased at Very Low Income Rent and restricted to occupancy by Very Low Income Households;
3 the balance of thirteen (13) units shall be covenanted to be leased at Low Income Rent and
4 restricted to occupancy by Low Income Households.

5 7. In addition to the dwelling units described in Paragraph 6, within the timeframe
6 described in Paragraph 9, below Successors shall develop or cause to be developed thirteen (13)
7 additional dwelling units, either as new construction or Substantial Rehabilitation (as defined
8 below), as replacement housing for the Park to address Plaintiffs' claims for development of
9 replacement housing pursuant to Health and Safety Code section 33413. No less than seven (7)
10 of the units developed pursuant to this paragraph shall be covenanted to be leased at Very Low
11 Income Rent and restricted to occupancy by Very Low Income Households; the balance of six (6)
12 units shall be covenanted to be leased at Low Income Rent and restricted to occupancy by Low
13 Income Households.

14 8. The Successors may reduce the number of dwelling units required to be developed
15 pursuant to Paragraph 7 (but not Paragraph 6) by one dwelling unit for each dwelling unit offered
16 to a household listed on Exhibit A or B hereto that is rejected by such household provided that a
17 household's rejection of a unit under this section will not disqualify that household from
18 eligibility under Paragraph 11. In order to reduce the unit count, (1) a displaced household must
19 receive an offer of affordable replacement housing after a determination (provided to the
20 displaced household in writing) by the operator of that housing that the displaced household
21 is eligible for occupancy of the replacement housing with respect to all of its qualifications and
22 restrictions, including but not limited to income, family size, rental history and credit score, (2)
23 the offer of affordable housing must be either hand delivered to the displaced household as
24 evidenced by a proof of personal service, or through regular and certified U.S. mail, and (3) the
25 displaced household must be allowed ten (10) business days after receipt of the offer to accept or
26 reject the offer.

1 9. The Successors shall develop, rehabilitate, construct or cause the development,
2 rehabilitation or construction (as applicable) of the dwelling units described in Paragraphs 6 and
3 7 ("Replacement Units") within four years from entry of judgment in this case.

4 10. "Substantial Rehabilitation" shall have the same meaning as contained in Health
5 and Safety Code section 33413.

6 11. In accordance with Health and Safety Code section 33411.3, all residents displaced
7 by the Redevelopment Agency shall have priority in occupancy of the Replacement Units
8 developed pursuant to this Judgment. Successors shall provide for such priority in any agreement
9 for development or administration of the Replacement Units, and shall maintain a list of eligible
10 persons and families displaced by the Redevelopment Agency.

11 12. Defendants shall provide notice to Plaintiffs' counsel upon (1) entry into an
12 agreement for development of Replacement Units, and (2) completion of construction of any
13 replacement dwelling units, no later than ten (10) days after issuance of a certificate of
14 occupancy. The number of required replacement dwelling units shall not be reduced pursuant to
15 Paragraph 8 unless the Successor Agency shall have provided notice (including a copy of the
16 offer) to Plaintiffs' Counsel within five (5) business days of making an offer of affordable
17 housing to a displaced household. Notice to Plaintiffs' counsel pursuant to this paragraph shall be
18 delivered by electronic mail and first class mail to: Public Counsel, Shashi Hanuman, Directing
19 Attorney, Community Development Project, 610 South Ardmere Avenue, Los Angeles,
20 California 90005, shanuman@publiccounsel.org. Parties shall cooperate in the exchange of
21 information relating to any offers.

22 13. Successor Agency shall pay additional relocation amounts to Individual Plaintiffs
23 based on rents paid in 2003 as initiation of negotiation rents, pursuant to the California Relocation
24 Assistance Act, 25 Code of California Regulations, § 6104, as set forth in the "Total Payment"
25 column of Exhibit A hereto.¹ Successor Agency shall pay additional relocation amounts to all

26 ¹ The parties note that in order to protect the privacy of the individual plaintiffs and displacees,
27 Exhibits A and B hereto reference each household by space number only. Parties have reviewed
28 and agree that the relocation amounts, household names, and corresponding space numbers in
Exhibit A, as previously exchanged by their respective counsel of record are correct.

1 other former residents of the Park whom they determined to be eligible for relocation assistance,
2 based on rents paid in 2005 as initiation of negotiation rents, pursuant to the California Relocation
3 Assistance Act, 25 Code of California Regulations, § 6104, as set forth in the "Total Payment"
4 column of Exhibit B hereto.

5 14. Pursuant to action of the California Legislature in Stats. 2012, Ch. 5 (Assembly
6 Bill No. 26, 2011-2012 1st Ex. Sess.) (the "Dissolution Act"), effective June 29, 2011,
7 redevelopment agencies throughout California began a dissolution process. The Dissolution Act
8 provides that the city "that authorized the creation of each redevelopment agency" became the
9 "successor agency" to that redevelopment agency, by operation of law, unless the designated
10 successor entity elected not to serve as the successor agency. California Health and Safety Code
11 sections 34173(a), (d). The Garden Grove City Council adopted resolutions electing to serve as
12 the Successor Agency to the dissolved Redevelopment Agency pursuant to Health and Safety
13 Code section 34173, and designating the Garden Grove Housing Authority as the Housing
14 Successor pursuant to Health and Safety Code section 34176. City of Garden Grove Resolution
15 Nos. 9072-11 (July 12, 2011) and 9089-12 (Jan 17, 2012). As prescribed by the Dissolution Act,
16 the amounts the Successor Agency is obligated to pay pursuant to the terms of this Judgment shall
17 be included as an enforceable obligation of the Successor Agency on each applicable Recognized
18 Obligation Payment Schedule ("ROPS"), as defined in California Health and Safety Code section
19 34171(h) and in accordance with Health and Safety Code section 34177(l), (m), and as set forth
20 below.

21 15. The Successor Agency shall include in the ROPS due to be completed and
22 approved by the oversight board of the Successor Agency no later than October 3, 2014, the
23 entire amount of relocation assistance due pursuant to Paragraph 13.

24 16. The Successor Agency shall include in the ROPS due to be completed and
25 approved by the oversight board of the Successor Agency no later than October 3, 2015 (ROPS
26 2015-16B), amounts for Replacement Units that will be expended during the January 1, 2016
27 through June 30, 2016 period. The amounts to be expended during this ROPS 2015-16B period

1 shall be appropriate to complete development of the Replacement Units for occupancy within
2 four years from entry of the Judgment.

3 17. The Successor Agency shall pay \$795,000 in attorneys' fees to Public Counsel.
4 This amount shall bear interest at the rate of 7 percent per annum, from the date of entry of this
5 Judgment, pursuant to Article XV, Section 1, of the California Constitution. The entire amount of
6 attorneys' fees shall be placed on the ROPS due to be completed by the oversight board of the
7 Successor Agency no later than October 3, 2014 (ROPS 2014-15B).

8 18. Parties agree that the obligations contained herein are obligations of the Garden
9 Grove Agency for Community Development ("Redevelopment Agency"), now dissolved, prior to
10 enactment of the Dissolution Act. Consistent with Health and Safety Code § 34173(e), Successor
11 Agency's liability for amounts owing pursuant to this Judgment shall be limited to the extent of
12 the total sum of property tax revenues the Successor Agency and the Housing Successor receive
13 pursuant to the ROPS process and the value of the assets received by the Successor Agency and
14 the Housing Successor. The Successor Agency shall continue to list the obligations of this
15 Judgment on each ROPS until all obligations required by the Judgment are satisfied.

16 19. Jackqulyn Bodenstedt as executor of the Estate of Randolph Maynor is substituted
17 as a plaintiff in this action in place of plaintiff Randolph Maynor, by reason of his death.

18 20. The Parties agree that the Court shall have continuing jurisdiction to enforce the
19 terms of this settlement and Judgment pursuant to California Code of Civil Procedure section
20 664.6.

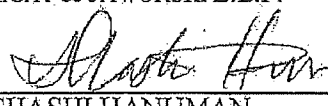
21 21. This Stipulation may be executed in any number of counterparts, each of which
22 when so executed shall be deemed an original and all of which taken together shall constitute one
23 and the same agreement.

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April
Dated: March 2, 2014

PUBLIC COUNSEL
CALIFORNIA AFFORDABLE HOUSING LAW PROJECT
FULBRIGHT & JAWORSKI L.L.P.

By: 
SHASHI HANUMAN

Attorneys for Plaintiffs/Petitioners *Marina Limon, Alfredo Cordero, Celia Gonzalez, Jose Sanchez, Raymond Kent Creamer, Ana Rosa Olea, Elidia Gonzalez, Ivan Torres, Javier Ibarra and The Kennedy Commission*

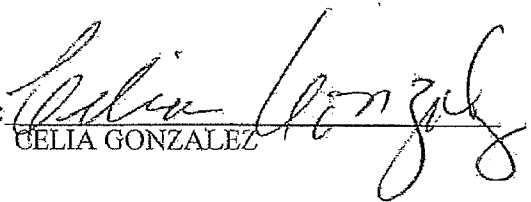
Dated: March 25, 2014

By: 
MARINA LIMON

Dated: March 25, 2014

By: 
ALFREDO CORDERO

Dated: March 25, 2014

By: 
CELIA GONZALEZ

Dated: March __, 2014

By: _____
JACKQULYN BODENSTEDT AS EXECUTOR
OF THE ESTATE OF RANDOLPH MAYNOR

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Dated: March __, 2014

PUBLIC COUNSEL
CALIFORNIA AFFORDABLE HOUSING LAW PROJECT
FULBRIGHT & JAWORSKI L.L.P.

By: _____
SHASHI HANUMAN

Attorneys for Plaintiffs/Petitioners *Marina Limon, Alfredo Cordero, Celia Gonzalez, Jose Sanchez, Raymond Kent Creamer, Ana Rosa Olea, Elidia Gonzalez, Ivan Torres, Javier Ibarra and The Kennedy Commission*

Dated: March __, 2014

By: _____
MARINA LIMON


Dated: March __, 2014

By: _____
ALFREDO CORDERO

Dated: March __, 2014

By: _____
CELIA GONZALEZ

Dated: March 27 2014

By: 
JACKOULYN BODENSTEDT AS EXECUTOR
OF THE ESTATE OF RANDOLPH MAYNOR

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Dated: March 25, 2014

By: Jose Sanchez
JOSE SANCHEZ

Dated: March 25, 2014

By: R. Kent Creamer
RAYMOND KENT CREAMER

Dated: March 25, 2014

By: Ana Rosa Olea
ANA ROSA OLEA

Dated: March 25, 2014

By: Elidia Gonzalez
ELIDIA GONZALEZ

Dated: March 28, 2014

By: Edwardo I Torres
IVAN TORRES

Dated: March 25, 2014

By: Javier Ibarra
JAVIER IBARRA

Dated: March __, 2014

By: _____
THE KENNEDY COMMISSION

Dated: March __, 2014

STRADLING YOCCA CARLSON & RAUTH
By: Allison Burns
ALLISON BURNS

Attorneys for Plaintiffs/Petitioners *Defendants*
Garden Grove Agency for Community Development (by
and through its successor agencies), The City of Garden
Grove, The Garden Grove Housing Authority and The
Garden Grove City Council

Dated: March __, 2014

By: _____
JOSE SANCHEZ

Dated: March __, 2014

By: _____
RAYMOND KENT CREAMER

Dated: March __, 2014

By: _____
ANA ROSÁ OLEA

Dated: March __, 2014

By: _____
ELIDIA GONZALEZ

Dated: March __, 2014

By: _____
IVAN TORRES

Dated: March __, 2014

By: _____
JAVIER IBARRA

Dated: March 27, 2014

By: 
THE KENNEDY COMMISSION

Dated: March 27, 2014

Stradling Yocca Carlson & Rauth

By: _____
ALLISON BURNS

*Attorneys for Plaintiffs/Petitioners Defendants
Garden Grove Agency for Community Development (by
and through its successor agencies), The City of Garden
Grove, The Garden Grove Housing Authority and The
Garden Grove City Council*

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Dated: March __, 2014

By: Matthew F. Fata
THE GARDEN GROVE HOUSING
AUTHORITY AS SUCCESSOR AGENCY TO
THE GARDEN GROVE AGENCY FOR
COMMUNITY DEVELOPMENT

Dated: March __, 2014

By: Matthew F. Fata
CITY OF GARDEN GROVE AS SUCCESSOR
AGENCY TO THE GARDEN GROVE AGENCY
FOR COMMUNITY DEVELOPMENT

Dated: March __, 2014

By: Matthew F. Fata
THE GARDEN GROVE CITY COUNCIL

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Exhibit A
Additional Relocation Payments to Plaintiffs

SPACE	Relocation Base Rent	2003 Rent	Differential	Total Payment
1	955	800	155	\$6,510.00
35	416	410	6	\$252.00
38	665	410	255	\$10,710.00
45	418.5	400	18.5	\$777.00
60	630	420	210	\$8,820.00
82	655	400	255	\$10,710.00
93	695	490	205	\$8,610.00
94a	392.4	470	-77.6	0
114	423.73	540	-116.27	0
118a	523.31	450	73.31	\$3,079.02

#49,468

Exhibit B
Additional Relocation Payments to Non-Plaintiff Displacees

SPACE	Relocation Base Rent	2005 Rent	Differential	Total Payment
2	587.95	575	12.95	\$543.90
14	331.19	565	-233.81	0
22	705	575	130	\$5,460.00
23	720	590	130	\$5,460.00
41	670	540	130	\$5,460.00
53	394.3	625	-230.7	0
57	695	565	130	\$5,460.00
74	695	565	130	\$5,460.00
75	344.1	555	-210.9	0
80a	715	585	130	\$5,460.00
85a	680	550	130	\$5,460.00
88a	402.97	590	-187.03	0
92a	698	615	83	\$3,486.00
98	650	520	130	\$5,460.00
100a	685	555	130	\$5,460.00
104	339	515	-176	0
105	695	565	130	\$5,460.00
107	675	545	130	\$5,460.00
109	336.3	550	-213.7	0
111a	675	545	130	\$5,460.00
115	670	540	130	\$5,460.00
116	690	560	130	\$5,460.00
119a	385.37	545	-159.63	0
120	705	575	130	\$5,460.00
122	669.29 (Section 8)	575	0	\$0.00
126	541.23	525	16.23	\$681.66
129	356.3	565	-208.7	0
130	695	565	130	\$5,460.00

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