

Gary M. Zeiss, Esq.



May 27, 2025

Heather Baker
City Attorney for Culver City
Culver City Hall
9770 Culver Blvd
Culver City, CA 90232
heather.baker@culvercity.org

Re: Request to Initiate a Litigation Hold

Heather:

Due to likely litigation regarding the City Council's actions regarding the propriety and constitutionality of the Jubilo Village project, I respectfully request that the city initiate a litigation hold regarding the following information.

First, all documents, communications, recordings, emails, attachments, text messages, videos, photos, data, reports, analyses, opinions, and other records (collectively, the "Information") related to the Jubilo Village project from 2019 until present.

Second, all Information arising from or related to the City's or the City Council's interaction with any employee, consultant, officer, or representative of the Community Corporation of Santa Monica (including all related entities) since the initial conception of the Jubilo Village project in 2019.

Third, all Information arising from or related to the City's or the City Council's interaction with any employee, consultant, officer, or representative of the Culver-Palms United Methodist Church (including all related entities) since the initial conception of the Jubilo Village project in 2019.

Fourth, all Information arising from or related to any City Councilor's communications with Disa Lindgren, whether expressly mentioning Jubilo Village or not, since 2019.

Please retain such information in a manner that makes it readily available when necessary and until the prospective legal claim is either withdrawn or dismissed. Note that I will be making a simultaneous public records request for this information through the Culver City portal.

I know that this creates extra work for an already overburdened staff, and I apologize for the imposition. However, continued access to this information may be necessary to determine the propriety of the project and its structure.

Certainly, feel free to contact me with any questions.

Thank you.

Respectfully,

A handwritten signature in blue ink, appearing to be "Gary M. Zeiss", with a long horizontal flourish extending to the right.

Gary M. Zeiss, Esq.