

**DECLARATION OF STEVEN L. WEINBERG**

I, Steven L. Weinberg, declare and state as follows:

1. I am an attorney licensed to practice in all courts in the State of California as well as the United States District Courts for Central and Eastern Districts of California, the United States Court of Appeals for the Ninth Circuit and the United States Court of Federal Claims. The facts stated herein are true of my own personal knowledge and I could and would competently testify thereto as follows.

2. I am the founder of Hillside Against Hadid (“Hillsides”). Hillside was formed in or about August 2020 as an unincorporated association following a series of public discussion threads appearing on the website known as “NextDoor.com” in June 2020.

3. The threads on NextDoor were about a massive construction project that was in the process of decimating a previously undeveloped hillside in lower Coldwater Canyon near the border of Beverly Hills at 9650 Cedarbrook Drive, Beverly Hills, California 90210 (“Cedarbrook”).

4. I have been a resident of Coldwater Canyon since October 2001 and live nearby Cedarbrook. Given the apocalyptic destruction of the hillside at Cedarbrook, the tenor of the public discussion on NextDoor was shock and amazement that the Los Angeles Department of Building & Safety (“LADBS”) would give building permits for a hotel-sized mansion (exceeding 75,000 square feet and including a 2000 foot elevated roadway and 30 foot high retaining walls) without any public notice, hearings, opportunity to be heard or community approval or oversight.

5. The discussion on NextDoor also included information that Cedarbrook was owned by a shell-company controlled by Mohamed Hadid (“Hadid”). Hadid had been in the news for destroying another nearby hillside in Bel-Air at Strada Vecchia. In connection with Strada Vecchia, it was known that Hadid was: (i) convicted of criminal violations of the Los Angeles Building & Safety Codes (including building without permits, violating the scope of issued permits and violating stop-work orders); (ii)

1 ordered by the Santa Monica Superior Court to dismantle the unpermitted structures; and  
2 (iii) responsible for a torrent of contentious civil litigation with neighbors and the City.

3           6.       Given the similar threat Hadid posed to our community, I formed  
4 HillSides with three main goals: (i) to gather and share information about Hadid and his  
5 intentions for our community; (ii) to raise awareness of Hadid’s plans and their resulting  
6 negative impacts on the environment, wildlife habitat and our community; and (iii) to work  
7 closely with our elected public officials and other community leaders to get meaningful  
8 laws passed, tailored to preserve and protect our remaining hillsides and wildlife habitat  
9 from out-of-control developers like Hadid.

10           7.       As part of these initiatives, I discovered that Hadid intended to build  
11 another project of similar size and scope as Cedarbrook (e.g., exceeding 75,000 square  
12 feet) at 9650 Royalton Drive, Beverly Hills, California 90210 (“Royalton”) atop the Hastain  
13 Trail in Franklin Canyon Park, a popular recreational destination used by thousands of  
14 Los Angeles area residents annually and owned by the National Park Service.

15           8.       The location of the building site for Royalton (i.e. the plateau of the  
16 Hastain Trail) was the same location that Hadid illegally graded and tried to develop a  
17 decade ago triggering the “Friends of the Hastain Trail” litigation from 2011–2016.

18           9.       As described in that litigation, Hastain Trail follows a historic fire road  
19 in the southern part of Franklin Canyon Park near the Doheny Ranch and has been  
20 continually used by the public as a nature walk and hiking trail since the 1960’s and  
21 remains an important public open-space resource and wildlife habitat and corridor.

22           10.      Hastain Trail is within National Park Service boundaries, but  
23 extensive portions (including the plateau) belong to Hadid. It is and continues to be my  
24 understanding that completion of the Royalton project would result in closure of all the  
25 Hadid-owned portions of the Hastain Trail, including the plateau which features  
26 spectacular 360 degree views of the Los Angeles basin and the San Fernando Valley.

27           11.      In order raise awareness of the threat posed by Hadid’s plans to  
28 develop the plateau of Hastain Trail (and close it), in August 2020, I obtained permission

1 to post signs alerting hikers and park visitors about Hadid's plans to build atop Hastain  
2 Trail ("Warning Signs"). Each of these Warning Signs was posted on public property with  
3 permission. No Warning Sign was ever posted on Hadid-owned land. Despite the  
4 placement of Warning Signs only public property, Hadid has repeatedly vandalized  
5 and/or removed the Warning Signs requiring time and expense to replace them.

6 12. I am responsible for posting the Warning Signs in Franklin Canyon  
7 Park. Neither I, nor Hillside Against Hadid has ever worked in coordination with or  
8 aligned with any creditor of Hadid in connection with posting the Warning Signs,  
9 including, without limitation "Give Back, LLC." In fact, at the time I posted the Warning  
10 Signs (August 2020), I was completely unaware that Hadid had even borrowed money  
11 which was secured by the Hadid-owned properties in Franklin Canyon Park.

12 13. Contrary to Hadid's contention in these cases, the signs do not seek  
13 to impose an "easement" on Hadid-owned properties or re-litigate any issue otherwise  
14 resolved in the "Friends of Hastain Trail" case. Instead, Hillside seeks to legally  
15 challenge the legitimacy of building permits issued to Hadid for Royalton (and  
16 Cedarbrook) pursuant to Los Angeles Municipal Code ("LAMC") § 98.0403.2 et seq.  
17 based on, among other things, the absence of veracity of Hadid's representations in such  
18 applications.

19 14. Hillside also seeks to stop Hadid's destruction of our community by  
20 way of the democratic process; namely working with our duly elected public officials to  
21 change zoning laws so that such massively out-of-scale and environmentally destructive  
22 developments do not obtain permits to build. As part of that initiative, in the Summer of  
23 2020, Hillside reached out Councilman David Ryu's office (Council District 4) to seek his  
24 help in extending an existing zoning law called the Hillside Construction Regulation  
25 ("HCR") to protect Franklin Canyon and the Hastain Trail (Ordinance No. 184827, Council  
26 File 16-1472-SI).

27 15. The HCR was passed in 2017 as a pilot program to regulate  
28 construction in certain limited hillside areas and included, among other things,

1 discretionary review process for large scale projects to reduce construction impacts.  
2 Pertinent here, the HCR provides that any single family dwelling project planned to  
3 exceed 17,500 square feet triggers "Site Plan Review" pursuant to LAMC § 16.05 which  
4 requires CEQA compliance and public hearings.

5           16. As a pilot program, the HCR did not initially cover the Coldwater  
6 Canyon and Franklin Canyon Park areas. As a result, Hadid was summarily given  
7 permits to destroy the hillside at Cedarbrook.

8           17. To prevent the further destruction of Coldwater Canyon and Franklin  
9 Canyon Park (and specifically Hastain Trail), Councilman Ryu's office agreed to help our  
10 community by advancing a package of motions in City Council to extend the HCR to  
11 cover our community.

12           18. Attached hereto collectively as Exhibit "D" true and correct copies of  
13 a series of motions Councilman Ryu filed in City Council in August/September 2020  
14 tailored specifically to stop further Hadid development in Franklin Canyon Park and  
15 Coldwater Canyon, including: (i) extension of the HCR zoning overlay [LA Council File:  
16 20-1101]; (ii) revising the single family dwelling size cap down to 15,750 [LA Council File:  
17 20-1098]; and (iii) amending the array of penalties available for violations of building  
18 codes including, denying building permits to a builder at one site, where the builder has  
19 violated the law at other sites [LA Council File: 20-0975]. These measures have  
20 advanced with approval through City Council and they are expected to be signed into  
21 law.

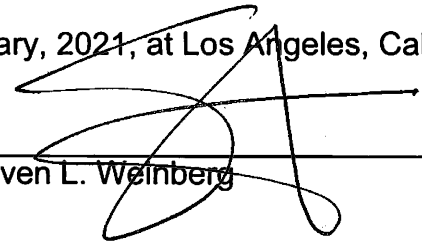
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19. Finally, Hillside has no legal relationship with Give Back, and Give Back is not working with Hillside to block the Debtors' proposed redevelopment of the Properties.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed this 3<sup>rd</sup> day of February, 2021, at Los Angeles, California.

  
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Steven L. Weinberg

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