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Superior Court of California,
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David W. Slayton,
Executive Officer/Clerk of Court,
By R. Lozano, Deputy Clerk

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JUAN NAVARRO on behalf of himself and others
11 similarly situated.

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13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **FOR THE COUNTY OF LOS ANGELES**

15 JUAN NAVARRO on behalf of himself and
16 others similarly situated.

Case No.: BC683876

17 PLAINTIFF,

CLASS ACTION

18 vs.

**DECLARATION OF JUAN NAVARRO IN
SUPPORT OF PLAINTIFF'S MOTION
FOR FINAL APPROVAL OF CLASS
ACTION SETTLEMENT**

19 L.A. SOUTHPARK HIGH-RISE, LP, a limited
20 partnership; and DOES 1 to 100, Inclusive.

21 DEFENDANTS.
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DECLARATION OF JUAN NAVARRO

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2 I, Juan Navarro, declare:

3 1. I am over the age of 18 and I am the named Plaintiff in this matter. I have personal
4 knowledge of the facts stated in this declaration and if called and sworn as a witness, I would
5 competently testify under oath regarding these facts.

6 2. I was a tenant of L.A. Southpark High-Rise, LP at its building at 717 Olympic
7 Boulevard from July 2016 until I moved out on or about September 10, 2017. As part of my lease, I
8 was required to pay a \$500 security deposit.

9 3. On or about October 4, 2017, L.A. Southpark High-Rise, LP emailed me a final
10 account statement which I recall as the first time I received a final account statement from L.A.
11 Southpark.

12 4. I understand that this is a class action lawsuit in which I am representing the interests
13 of tenants who moved out from L.A. Southpark High-Rise, LP's building located at 717 Olympic
14 Boulevard in Los Angeles, California from approximately November 2013 to approximately
15 December 16, 2019, when I understand L.A. Southpark High-Rise, LP sold the building. I understand
16 that the lawsuit alleges L.A. Southpark High-Rise, LP did not provide tenants with a complete
17 accounting of all of the charges it charged from tenants' security deposit when they moved out and
18 withheld the security deposit for improper charges in bad faith.

19 5. As a class representative, I understand that I must protect the interests of the class
20 members and put the class members' interests before my own interests. I know that L.A. Southpark
21 contends that after I filed the lawsuit it paid me my entire security deposit, but I did not file this action
22 solely based on the money it had withheld. I filed this class action lawsuit based on principle because
23 I wanted to make sure L.A. Southpark was not engaging in a regular practice of improperly charging
24 tenants following my negative experience with moving out from L.A. Southpark. Because of this
25 desire to ensure proper treatment of its tenants, I am still willing and ready to serve as the class
26 representative in this matter.

27 6. I have actively participated in the lawsuit against L.A. Southpark. I began to speak to
28 my attorney for my claims in approximately October 2017. Throughout the litigation, I have provided

1 my attorneys with documents and information about my experiences with L.A. Southpark whenever
2 they have requested my assistance. In 2018, I worked with my attorneys to respond to L.A.
3 Southpark's two sets of interrogatories and two sets of requests for production of documents. I
4 gathered documents consisting of my lease, final account statement, and communications with L.A.
5 Southpark regarding my move out and charges that L.A. Southpark had made from my deposit. I
6 responded when my attorneys contacted me and spoke with them to provide information about my
7 experience with L.A. Southpark, my understanding about L.A. Southpark's deposit, cleaning and
8 repair, and retention of deposit procedures. I reviewed the responses to the interrogatories and
9 requests for production of documents for accuracy. I also made myself available for preparation for
10 my deposition and for L.A. Southpark to take my deposition in May 2018. In 2019, I spoke with my
11 attorneys and provided a information to oppose the motion for summary judgment filed by L.A.
12 Southpark. In 2022, I spoke with my attorneys in preparation of the motion for class certification in
13 this matter and provided a declaration in support of the motion for class certification. I made myself
14 available to my attorneys for the three mediations that occurred in this matter and was prepared to
15 provide any information they needed for the mediations. Once the case had settled, I spent time
16 reviewing and discussing the settlement agreement and settlement terms with my attorneys before
17 signing the settlement.

18 7. I estimate that I have spent approximately 100 to 120 hours on this lawsuit which
19 includes time spent initially discussing the case with my attorneys, searching for documents to help
20 the lawsuit, providing those documents and information to my attorneys, responding to my attorneys
21 telephone calls to provide them with more information throughout litigation, responding to the
22 interrogatories and requests for production of documents served by L.A. Southpark, preparing for and
23 submitting to my deposition, provide information and a declaration in support of class certification,
24 reviewing the settlement agreement and making myself available for the mediations, reviewing the
25 settlement and its amendments, and reviewing and providing information for this declaration.

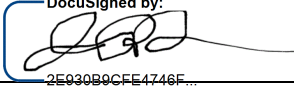
26 8. I also understand that if the case had to go to trial or needed me to attend any other
27 hearing, I would have needed to take time off work and be present at the trial or hearing and comply
28 with any other request from the court. I have tried to help the case by responding to my attorneys

1 whenever they needed me and by providing them with any requested information or documents that
2 I have. I know that I took a risk by filing this lawsuit because if L.A. Southpark had won the case, I
3 would have been responsible for L.A. Southpark’s costs of the case. I also would have lost income if
4 I had to take additional work off work to come to trial or any other hearings. I am also aware that
5 some parties or companies may learn of the lawsuit and view me negatively because I hired an
6 attorney and sued a company on a class action basis when I thought my rights were violated.

7 9. I assumed these risks and filed this lawsuit because I did not feel that L.A. Southpark
8 had complied with the law or treated me fairly when I had moved out and I wanted to make sure
9 L.A. Southpark was not engaging in a regular practice of improperly charging tenants moving out
10 from L.A. Southpark.

11 10. I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct.

13 Date: 6/16/2023
14 _____

DocuSigned by:

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Juan Navarro

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