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CITY OF LOS ANGELES

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

LA ALLIANCE FOR HUMAN RIGHTS,
et al.,

Plaintiffs,

v.

CITY OF LOS ANGELES, a Municipal
entity, et al.,

Defendant.

CASE NO. 2:20-cv-02291 DOC (KES)

**DECLARATION OF MATTHEW
W. SZABO IN RESPONSE TO
JUNE 5, 2025 AMENDED ORDER
REQUIRING CITY
VERIFICATION OF TLS
REPORTING**

Honorable David O. Carter,
United States District Judge

Action Filed: March 10, 2020

DECLARATION OF MATTHEW W. SZABO IN RESPONSE TO JUNE 5, 2025
AMENDED ORDER REQUIRING CITY VERIFICATION OF TLS REPORTING
2:20-cv-02291 DOC (KES)

1 I, Matthew W. Szabo, declare as follows:

2 1. I am the City Administrative Officer for the City of Los Angeles. I submit
3 this declaration in response to the Court's June 5, 2025 Amended Order Requiring City
4 Verification of TLS Reporting. If called and sworn as a witness, I could and would
5 testify competently to the following:

6 2. Attached as **Exhibit A** is a true and correct copy of a spreadsheet provided
7 by the Los Angeles Homeless Services Authority ("LAHSA") to the City containing the
8 data requested by the Court for each of the 2,679 TLS slots (line 1 in Dkt. 891-1) as of
9 March 31, 2025, and an accompanying appendix provided by LAHSA to the City
10 defining the data fields in the spreadsheet.

11 3. Attached as **Exhibit B** is a true and correct copy of a spreadsheet provided
12 by LAHSA to the City containing the data requested by the Court for each of the 2,679
13 TLS slots (line 1 in Dkt. 891-1) as of June 5, 2025, and an accompanying appendix
14 provided by LAHSA to the City defining the data fields in the spreadsheet.

15 4. I understand that the Court has requested data regarding the 130 Scattered
16 Sites of Rapid Rehousing/Shared Housing listed in lines 60 and 61 in Dkt. 891-1.
17 LAHSA has informed the City that the 130 Scattered Sites of Rapid Rehousing/Shared
18 Housing should not have been separately listed because slots under those programs were
19 already included within the 2,679 TLS slots listed in line 1 in Dkt. 891-1 to the extent
20 they were occupied as of March 31, 2025. There is thus no additional data to provide
21 regarding the 130 Scattered Sites of Rapid Rehousing/Shared Housing that is not already
22 contained in the spreadsheets attached as Exhibit A and Exhibit B. Removing those 130
23 Scattered Sites of Rapid Rehousing/Shared Housing reduces the total number of open
24 and occupiable beds reported for the Roadmap agreement in the quarterly report for the
25 quarter ended March 31, 2025 from 7,624 to 7,494.

26 5. At my direction, members of my staff compared the 2,679 addresses in the
27 spreadsheets attached as Exhibit A and Exhibit B with the addresses reported for the LA
28

1 Alliance settlement in the quarterly report for the quarter ended March 31, 2025 (Dkt.
2 892-1). Out of the 11,002 open and in process beds listed in the LA Alliance settlement
3 quarterly report for the quarter ended March 31, 2025 (Dkt. 892-1), the City has
4 determined (based upon its review and analysis of the information provided by LAHSA
5 in Exhibits A and B) that 12 beds overlap with addresses associated with the 2,679 TLS
6 slots and should not have been listed in the quarterly report for the Roadmap agreement
7 for the quarter ended March 31, 2025 (Dkt. 891-1). Specifically, 1 bed in row 23 in Dkt.
8 892-1, 1 bed in row 38 in Dkt. 892-1, 7 beds in row 52 in Dkt. 892-1, 2 beds in row 60
9 in Dkt. 892-1, and 1 bed in row 86 in Dkt. 892-1 overlap with addresses associated with
10 the 2,679 TLS slots listed in line 1 in Dkt. 891-1. Removing those beds further reduces
11 the total number of open and occupiable beds reported for the Roadmap agreement in
12 the quarterly report for the quarter ended March 31, 2025 from 7,494 to 7,482.

13 6. In addition to what was described in paragraph 5, there are 6 building
14 addresses associated with the 2,679 TLS slots listed in line 1 in Dkt. 891-1 that are the
15 same as some of the building addresses listed in the LA Alliance settlement quarterly
16 report for the quarter ended March 31, 2025 (Dkt. 892-1)—specifically, the addresses
17 corresponding to rows 39, 61, 94, 98, and 138 in Dkt. 892-1. But this does not reflect
18 overlap in actual beds because the building addresses contained multiple distinct units
19 and no TLS slots for those buildings were reported in the LA Alliance settlement
20 quarterly report for the quarter ended March 31, 2025.

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

23
24
25 DATED: June 11, 2025



Matthew W. Szabo

EXHIBIT A

FILED UNDER SEAL PURSUANT TO ORDER OF THE COURT DATED JUNE
5, 2025. L.R. 79-5.2.2.2(c).

EXHIBIT B

FILED UNDER SEAL PURSUANT TO ORDER OF THE COURT DATED
JUNE 5, 2025. L.R. 79-5.2.2.2(c).