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17 Attorneys for Plaintiffs
CORY SPENCER, DIANA MILENA
18 REED, and COASTAL PROTECTION
RANGERS, INC.
19

20 **UNITED STATES DISTRICT COURT**
21 **CENTRAL DISTRICT OF CALIFORNIA, WESTERN DIVISION**
22

23 CORY SPENCER, an individual;
24 DIANA MILENA REED, an
individual; and COASTAL
25 PROTECTION RANGERS, INC., a
26 California non-profit public benefit
corporation,

27 Plaintiffs,
28

CASE NO. 2:16-cv-02129-SJO (RAOx)

**DECLARATION OF JOSEPH
LANNING IN SUPPORT OF
PLAINTIFFS' MOTION FOR CLASS
CERTIFICATION**

Judge: Hon. S. James Otero
Date: February 21, 2017
Time: 10:00 a.m.
Crtrm.: 10C

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v.

LUNADA BAY BOYS; THE
INDIVIDUAL MEMBERS OF THE
LUNADA BAY BOYS, including but
not limited to SANG LEE, BRANT
BLAKEMAN, ALAN JOHNSTON
AKA JALIAN JOHNSTON,
MICHAEL RAE PAPAYANS,
ANGELO FERRARA, FRANK
FERRARA, CHARLIE FERRARA,
and N. F.; CITY OF PALOS
VERDES ESTATES; CHIEF OF
POLICE JEFF KEPLEY, in his
representative capacity; and DOES
1-10,

Defendants.

I, Joseph Lanning, declare as follows:

1. For the last 30 years, I have resided in San Pedro, California. Currently, I am a retired art director. I have personal knowledge of the matters stated in this declaration and, if called as a witness, could and would testify competently as to its contents.

2. I grew up in Manhattan Beach, California, and I attended Aviation High School in Redondo Beach, California. I have also lived in Torrance, Lawndale, and Redondo Beach, all in California. I attended El Camino College in Torrance where I received an associate's degree in general education.

3. I enjoy hiking and walking my dogs, both German shepherds, and I like having the freedom to hike and walk my dogs wherever I can. I have driven by Lunada Bay, and it's a beautiful place where I would like to hike or walk my dogs.

1 4. However, for more than 30 years, while living in the South Bay
2 area, I have heard that Lunada Bay is off-limits to outsiders and that people
3 will be bullied and assaulted and their cars will be vandalized if they go
4 there. Although my German shepherd dogs might protect me, I would be
5 concerned that they would harm someone harassing me and I would be held
6 liable. I am informed and believe that the locals at Lunada Bay will harass
7 not just surfers but anyone who might be perceived as encroaching on their
8 territory. For these reasons, I have avoided visiting Lunada Bay.

9 5. On January 30, 2016, I wrote an e-mail to Palos Verdes Estates
10 Police Chief Jeff Kepley about my concerns regarding the bullying and illegal
11 activities of the Lunada Bay Boys. Chief Kepley responded on the same
12 day, and said that City staff is considering options “to deal with this situation
13 including gang-related legal remedies. ... Work continues on that front.
14 Further, staff is assessing options related to the stone patio, which too is not
15 as simple as one would think.” Attached as **Exhibit 1** is a true and correct
16 copy of this e-mail exchange.

17 6. If it were safe for me to visit Lunada Bay and I were not hassled,
18 I would like to visit Lunada Bay to hike or walk my dogs. However, because
19 of the actions by the Lunada Bay Boys and the City of Palos Verdes Estates,
20 I am denied access to Lunada Bay.

21 7. I want the aggressive Bay Boys that engage in unlawful activity
22 to be barred from using this beach for sufficient time to change attitudes and
23 for this beach to be returned to the public. I want the City of Palos Verdes
24 Estates to enforce its ordinances fairly, for it to provide signage so people
25 will know Lunada Bay is a public beach, for it to provide signage marking the
26 safest trails to the shoreline, and for the police to take complaints by visiting
27 beachgoers seriously and be available to help in case non-local beachgoers
28 are assaulted or otherwise unlawfully excluded from Lunada Bay. I want to

1 be able to visit Palos Verdes Estates beaches, specifically Lunada Bay,
2 without being intimidated and to be safe in my person and property. And if I
3 am harassed, I want the City of Palos Verdes Estates police to take my
4 complaints seriously, instead of simply telling me to get along with the locals.

5

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

8 Executed in SAN PEDRO, California on December 20,
9 2016.

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JOSEPH LANNING

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EXHIBIT 1

