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September 10, 2012

VIA EMAIL (KJacobs@davis-stirling.com) and FACSIMILE (310) 945-0281

Karen N. Jacobs, Esq.
Adams Kessler PLC
2566 Overland Avenue, Suite 730
Los Angeles, CA 90064

Re: Sullivan v. Wood Ranch Sycamore Canyon Village Association
Ventura County Superior Court Case No. 56-2011-00395532-CU-CO-SIM
Your Client: Wood Ranch Sycamore Canyon Village
Association ("Association")
Our Clients: Ted and Paula Sullivan
Clients' Property: [REDACTED] Wood Ranch Parkway, Simi Valley, CA 93065
Lot 384, Tract 4053 ("Property")

Dear Ms. Jacobs:

After further reviewing your email dated August 31, 2012, it appears to state that you could not substantively respond to some of the issues addressed in our letter dated August 16, 2012 until the Board had more time to review them. Given the fact that the Association, its Board and your office are familiar with the subject of the non-viable Association Trees, we disagree with that contention. With regard to the above-referenced lawsuit, it was your letter dated July 26, 2012 that attempted to litigate this action, to which it was necessary for us to respond. Moreover, the fact that the Association chooses to use two law firms should give the Association more awareness of the issues - not less.

We note that the next Board meeting is scheduled for Tuesday, September 11, 2012. On behalf of the Association, the Board members should be able to decide at this September 11 meeting whether they agree that (1) Mr. and Mrs. Sullivan may remove the 17 non-viable Association Trees from the Sullivan Property; and (2) the Association will immediately reimburse the Sullivans for the removal of these non-viable Association Trees. Please confirm in writing to this office prior to the meeting (approximately one month since your office received our August 16, 2012 letter) whether the Board intends to place the foregoing issues on its agenda for the September 11 meeting. Time is of the essence as the rainy/windy season is fast

approaching, and the non-viable Association Trees are most vulnerable and dangerous during this season. **If the Association refuses, or we do not receive a written response by September 14, 2012, Mr. and Mrs. Sullivan will cause all of the Association Trees, including the 17 non-viable Association Trees, to be trimmed/pruned at the expense of the Association.** Mr. and Mrs. Sullivan will seek recovery of the monies spent to trim/prune all of the Association Trees, and related trees, including those in the Sandstone Garden, as discussed in our August 16 letter. Unless you otherwise advise us in writing by September 14, 2012, we will conclude that the Association, through its Board of Directors, refuses to reimburse Mr. and Mrs. Sullivan for the costs of (i) repair of the drainage system on the Property and (ii) prior and current removal of weeds and tree trimming/pruning everywhere on the Property.

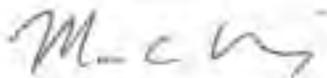
Please make available to us the record of how each Board member previously voted on the subject of the issues raised in our August 16, 2012 letter including, but not limited to the removal of the non-viable Association Trees, and how each Board member votes on these matters on September 11, 2012. **If the Board takes the position that it does not have to disclose this information to us, please retain this information so that it is available at or before trial.**

Finally, regarding your suggestion that the parties participate in mediation, our clients have always been willing to mediate and, in fact, proposed it prior to filing their lawsuit, only to have it rejected by the Association. Mr. and Mrs. Sullivan remain open to mediation if the Association is serious about resolving this action. We proposed mediation to Mr. Gorney, with suggested mediators, most recently in our letter to him dated July 27, 2012. We have not received even the courtesy of a response to any of our requests.

All of our clients' rights remain reserved.

Very truly yours,

SILVER & ARSHT



SAMUEL J. ARSHT
MARSHA C. BRILLIANT

cc: Mr. and Mrs. Ted Sullivan
David Gorney, Esq.

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Our Clients: Ted and Paula Sullivan - Sullivan v. Wood Ranch Sycamore Canyon Village Association - Letter to Karen N. Jacobs

Marsha Brilliant <mbrilliant@silverandarsh.com>

Mon, Sep 10, 2012 at 3:33 PM

To: "Karen Jacobs (Kjacobs@davis-stirling.com)" <Kjacobs@davis-stirling.com>

Cc: David Gomey <dgc@manningllp.com> Samuel Arsht <sam@silverandarsh.com>

Ms. Jacobs,

Attached is a letter which we have also faxed to your office this afternoon (we received confirmation that the letter was received by your office).

Please immediately review this letter. Among other things, it requests a response by tomorrow, September 11, prior to the Association's Board meeting, regarding whether the Board intends to place the issues addressed in this letter on its agenda for the September 11 meeting.

Very truly yours,

Marsha C. Brilliant, Esq.

SILVER & ARSHT

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