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April 20, 2026

***By Email- ccobern@munckwilson.com***

Chase A. Cobern  
Munck Wilson Mandala LLP  
1900 Texas Capital Center  
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Dallas, Texas 75201

Re: Placerita Canyon Property Owners Association's March 30 letter to the City of Santa Clarita re Master Case No. 25-030 and The Master's University Proliferation of RHOPs in Placerita Canyon

Dear Mr. Cobern:

I am in receipt of your April 10, 2026 letter to my client Placerita Canyon Property Owners Association (PCPOA), and as a courtesy, am responding by the deadline requested in your April 10 letter which is attached as Exhibit 1 for ease of reference. On behalf of the PCPOA, I express profound disappointment with the tenor and tone of your letter about what heretofore has been a respectful, iterative process between PCPOA and The Masters University (TMU) concerning PCPOA's legitimate, legally based concerns regarding TMU's Amended Master Plan and the changes TMU proposes to the original planning document. As set forth in more detail below, the content of PCPOA's March 30 letter to the City of Santa Clarita (City) City Council and Planning Department and public statements regarding TMU's Amended Master Plan are protected speech that are not subject to legal challenge. PCPOA, therefore, remains hopeful that TMU will reengage with it and participate with PCPOA and the City in a robust review process that will result in a legally compliant Amended Master Plan that addresses both the City's and PCPOA's legitimate concerns and TMU's needs.

Before TMU canceled its mutually agreed-upon meeting with PCPOA scheduled for April 2, 2026, PCPOA was looking forward to discussing a suggested approach to the Amended Master Plan which would have resulted in streamlined review under the California Environmental Quality Act (CEQA) and a faster approval process while addressing concerns that PCPOA shares with the City about the Amendment. As set forth in more detail in the March 30 letter, these include TMU's extensive use of RHOPs for student housing that had not been previously proposed in the original Master Plan or analyzed under CEQA. Indeed, most of the concerns PCPOA raised in its March 30 letter to the City about RHOPs are virtually identical to those listed in the City's Development Review Committee November 26, 2025



comments on TMU’s proposed amendment to the Master Plan in PL-12 and PL-13 at pages 4-5. TMU’s extensive use of RHOPs for student housing in the Placerita Canyon Special Standards District (PCSSD) was never contemplated nor were the impacts analyzed when the TMU Master Plan and 2019 10-year extension to the Master Plan were adopted. A project that is developed differently than planned without preparation of subsequent environmental analysis violates CEQA and is subject to challenge by writ of mandate. *See Concerned Citizens of Costa Mesa, Inc. v. 32nd District Agricultural Association* (1986) 42 Cal.3d 929. Rather than litigating, PCPOA has chosen to work with TMU to address concerns, and hopes that we can return to a productive, non-litigious approach.

**I. PCPOA’s Comments on the Master Plan Amendment are Protected Speech and Expressly Encouraged by CEQA**

As a Texas lawyer, perhaps you are unfamiliar with the landmark CEQA statute which requires compliance for all development – including development plans for religious organizations. *See* Pub. Res. Code §21080(a); CEQA Guidelines §15002, 15378(a); *County of Los Angeles v. Sahag-Mesrob Armenian Chrisitan School* (2010) 188 Cal.App.4th 851 (proper review under CEQA and conditional use permit for “large” intensification of use of church property does not constitute a substantial burden on the exercise of religious beliefs or violate RLUIPA). Your letter does not even mention TMU’s required compliance with CEQA or the CEQA process which is a key focus of PCPOA’s letter. Instead, your letter consists of improper attacks on PCPOA’s exercise of its right to comment on pending land use applications before the City. CEQA requires that comments to the lead agency from the public on the potential environmental effects of a project be submitted as soon as possible in the review process to allow the agency to identify potential significant environmental effects and mitigation measures which would substantially reduce those effects. *Save our Peninsula Com. v. Monterey County Bd. of Sup.* (2001) 87 Cal.App.4th 99, 133 (public comment should be allowed early in the application process so that potential significant adverse effects of the project can be identified “at the earliest possible time”) citing *Laurel Heights Improvement Assn., Inc. v. Regents of University of California* (1993) 6 Cal.4th 1112, 1129; Pub. Resources Code §21003.1. *See also* CEQA Guidelines (Title 14 Cal. Code Reg., Div. 6 Chapt. 3) §§15022(a)(5), 15044.

The PCPOA comments on the Amended Master Plan you identify as problematic were made either in writing, at public fora, and in general. These constitute protected speech. California’s Anti-SLAPP statute prohibits litigation that attacks the free exercise of speech arising from any act in furtherance of that person’s right of free speech under the United States or California constitutions in connection with a public issue. CCP §425.16 and subsection (b)(1). Included in subsection(e)’s definition of “act” specified in subsection (b) are the following:

- (1) any written or oral statement or writing made before a legislative, executive, or judicial proceeding, or any other official proceeding authorized by law, (2) any written or oral statement or writing made in connection with an issue under consideration or review by a legislative, executive, or judicial body, or any other official proceeding authorized by law, (3) any written or oral statement or writing made in a place open to the public or a public forum in connection with an issue of public interest, or (4) any other conduct in furtherance of the exercise of the



constitutional right of petition or the constitutional right of free speech in connection with a public issue or an issue of public interest.

The Ninth Circuit applies California's Anti-SLAPP statute to actions filed in federal court. *See CoreCivic, Inc. v. Candide Group, LLC* (9<sup>th</sup> Cir. 2022) 46 F.4th 1136, 1143. PCPOA's letter to the City and public comments regarding the Master Plan and Amended Master Plan -- including that TMU's original Master Plan did not analyze impacts from use of RHOPs, identifying project impacts that the Amended Master Plan needs to analyze, and other code provisions that the City needs to enforce (or amend for clarity) -- are grounded in fact and law, are entirely appropriate for this phase of the City's review of TMU's Amended Master Plan, and constitute protected speech.

As for your other substantive contentions, they are addressed in turn below.

1. Your characterization of the SSD as "a mere developmental overlay" is inaccurate. Santa Clarita Municipal Code (SCMC) section 17.39.020(A) defines the intent and purpose of the PCSSD is "to protect, maintain, preserve and enhance the secluded, rural equestrian character of the community...and protect the light, air, and privacy of existing single-family residences from negative impacts." This means that all the provisions of the code section must be interpreted and applied to effectuate this purpose, and proposed development in the PCSSD must be mitigated so as not to interfere with or impede the stated intent and purpose. PCPOA's request to the City to restrict RHOPs is not grounded only in the PCSSD but in TMU's violation of CEQA to use existing houses in the PCSSD for student housing that was not provided for or analyzed in the original Master Plan. The fact that it occurred in violation of applicable law prompted PCPOA to ask for a clarifying amendment.
2. Your characterization of PCPOA's comments about the change in the Chapel/Conference Center location and RHOPs is not accurate.
  - As stated above, TMU's use of RHOPs was not included in the original Master Plan and potential impacts, therefore, were not analyzed. Indeed, the original Master Plan provided that student housing would be located on campus. Use of RHOPs instead of dormitories without specifying that use as part of the Master Plan and analyzing impacts under CEQA violates applicable law. The letter merely seeks to ameliorate this legal infirmity by requiring that the illegal uses not be expanded, and that impacts of existing uses be assessed in order to continue pending completion of the Amended Master Plan. The remaining PCPOA comments -- to define RHOP uses, limit them in the future to faculty and staff, and have a transition plan included in the Amended Master Plan all repeat the Planning Department staff's comments identified above.
  - Contrary to your inaccurate characterization, PCPOA does not seek to treat TMU on less than equal terms than any other proposed development in the area. Rather, PCPOA seeks the same robust CEQA analysis and opportunity to comment on TMU's proposed development as it did with, for example, the proposed Shadowbox Studios. The robust public comments as part of the CEQA analysis and land use approval process resulted in a settlement.

- None of the other authorized uses in the PCSSD that you cite at page 2, paragraph 2 under section 17.39.020(C) apply to TMU or PCPOA's concerns. Section 17.39.020(C) is limited to Melody Ranch whose existence predates the City's adoption of the PCSSD in 2013, and was by law, grandfathered in.
- The Public Resources Code section and Government Code sections regarding housing are inapplicable. The RHOPs merely convert existing houses to dormitory residences and do not constitute a housing project – i.e. construction of new housing (Gov't Code §65589.5(a)(2)(K)), as required under Gov't Code section 65912.156(g) nor otherwise qualify as transit oriented housing development. Pub. Resources Code section 21085 also does not apply since TMU is not taking the position that its use of RHOPs is a stand-alone residential project nor is the Amended Master Plan a residential project.
- You claim without specification that PCPOA made false statements at City Council meetings and in other fora. If you claim PCPOA is making actionable false statements, you need to identify such before threatening to sue.
- Your attempts to assert claims under the Fair Housing Act 42 USC 3604(b), Civil Rights Act 42 USC 1983 1985(3), and Common and Statutory law claims (*Morris v. W. Hayden Addition Homeowners Assn., Inc.* (9<sup>th</sup> Cir. 2024) 104 F.4<sup>th</sup> 1128, 1142-3) are unavailing as none of the above pertain to a citizen's independent right to participate in a public review process of a pending development application to ensure that applicable land use statutes and ordinances, including CEQA, are complied with.
- Your reliance on RLUIPA, 42 USC §2000 et seq. is similarly unavailing for two reasons. First, you do not accurately characterize PCPOA's letter that raises legitimate concerns about TMU's unauthorized use of RHOPs for student housing and impacts from the change in the Chapel/Conference Center location. Your statement claiming that PCPOA's objections are based only on "an erroneous interpretation of the SSD as a restriction on TMU's use for RHOPs or chapel construction" is simply inaccurate. PCPOA's proposals are based on PCPOA's insistence that the City comply with CEQA and applicable law. Second, RLUIPA does not preclude neutral application of CEQA and land use requirements for legitimate regulatory purposes on proposed development by a religious organization, especially those related to parking, traffic, safety concerns, or environmental impacts. See *Centro Familiar Cristiano Buenas Nuevas V. City Of Yuma* (9<sup>th</sup> Cir. 2011) 651 F.3d 1163, 1172-1173; *County of Los Angeles v. Sahag-Mesrob Armenian Christian School* (2010) 188 Cal.App.4th 851 (Requiring proper review under CEQA and a conditional use permit for "large" intensification of use of church property did not violate RLUIPA).

## II. TMU's Preservation Demand is Overbroad

You include a preservation demand for documents in case TMU decides to initiate litigation. As you know, a demand can only be made if you reasonably contemplate filing a lawsuit. In any event, this preservation demand is overbroad. In addition, your demand that PCPOA stakeholders receive a "balanced assessment" regarding your litigation threat is inappropriate as it invades attorney-client communications which, as you know are privileged. Cal. Evid. Code §954; Fed. R. Evid. §502. The content and nature of any communications to my client in connection with your letter will not be

disclosed. That said, PCPOA, of course, will comply with applicable law and preserve potentially relevant information. *In re Napster, Inc. Copyright Litig.* (N.D. Cal. 2006) 462 F. Supp. 2d 1060, 1066; *Cedars-Sinai Med. Ctr. v. Superior Court* (1998) 18 Cal. 4<sup>th</sup> 1, 12-13.

### III. Conclusion

It is unfortunate that this exchange of letters has occurred. On behalf of PCPOA, I want to be clear that PCPOA remains committed to returning to the process it previously enjoyed with TMU to work through remaining differences about TMU's proposed Amendment to the Master Plan, and to reaching agreement about a CEQA and legally compliant development that meets TMU's needs. With open minded dedication to addressing PCPOA's concerns and TMU's needs, we believe that this result can readily be achieved.

Very truly yours,



Lisabeth Rothman

cc: Mayor Laurene Weste ([lweste@santaclarita.gov](mailto:lweste@santaclarita.gov))  
Mayor Pro Tem Patsy Ayala ([payala@santaclarita.gov](mailto:payala@santaclarita.gov))  
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**EXHIBIT 1**

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April 10, 2026

**Via E-mail** *lrothman@HepnerMyers.com*

Placerita Canyon Property Owners Association  
c/o Lisabeth Rothman  
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San Luis Obispo, CA 93401

**Re: Notice of Anticipated Litigation, Preservation Demand, and Request for Disclosure to All PCPOA Stakeholders**

Dear Ms. Rothman:

As you know, our firm represents The Master's University and its affiliated entities ("TMU") in connection with TMU's proposed revised campus Master Plan, including the site plan for the Centennial property (Master Case No. 25-030). We are in receipt of the March 26, 2026 letter that you submitted on behalf of the Placerita Canyon Property Owners Association ("PCPOA") to the Santa Clarita City Council ("PCPOA Letter"). TMU will provide the City with its substantive response to the PCPOA Letter in due course.

The purpose of this letter is to: **(1)** place PCPOA and its counsel on notice of anticipated litigation arising from PCPOA's course of conduct toward TMU—including, without limitation, PCPOA's ongoing interference with TMU's legitimate land-use rights in connection with the City's review and approval of TMU's Residential High Occupancy Permits ("RHOPs") and proposed Amendment to its Master Plan; **(2)** demand that PCPOA immediately preserve all relevant documents and electronically stored information ("ESI") that may be relevant to the anticipated litigation; and **(3)** request that an objective risk assessment—together with this letter—be disclosed to all PCPOA's stakeholders, including its officers, board members, and other representatives.

## **I. Anticipation of Litigation Involving PCPOA**

PCPOA's campaign of interference with TMU's land use is legally baseless and exposes PCPOA and its representatives to anticipated litigation both as defendants and third-party discovery targets. Without undertaking here to catalogue the full extent of legal deficiencies in your PCPOA Letter or PCPOA's broader course of conduct—both of which TMU's

**MUNCK WILSON MANDALA LLP**

Ms. Lisabeth Rothman  
April 8, 2026  
Page 2

forthcoming substantive response will address in detail—the following examples illustrate the nature and basis of TMU’s anticipated claims.

1. Your PCPOA Letter, like PCPOA’s repeated public assertions to the City Council, systematically mischaracterizes the Placerita Canyon Special Standards District (“SSD”) as a restriction on TMU’s lawful use and enjoyment of its real property, including for religious purposes. As you know, the SSD is, by its plain text, a mere development-standards overlay governing physical infrastructure requirements for new construction—not a restriction on the *use, occupancy, or ownership* of existing residential properties, much less a legal basis for “impos[ing] a moratorium on” or “prohibit[ing] RHOP[s] within the [ ]SSD,” as PCPOA requests. That is why your PCPOA Letter asks the City to “*amend*[ ]” the SSD to “prohibit RHOP[s]”—an open admission that the SSD does not contain the very land-use restrictions PCPOA is asking the City to impose on TMU. Nor does any other law or authority; to the contrary, as your letter concedes: “[t]he RHOP ordinance does not limit the number of occupants per house except based on parking spaces per vehicle.” PCPOA’s continued mischaracterization of the SSD as a restriction on TMU’s lawful land use is frivolous and should cease immediately.

2. PCPOA’s attempt to weaponize the SSD against TMU, if adopted by the City, would unlawfully treat TMU’s land use for residential housing and chapel construction on less than equal terms with secular uses that have similar or greater impacts on the SSD’s “rural equestrian character.” As just one example, the SSD expressly authorizes “land use” in Placerita Canyon for “full service motion picture and television studios” including “facilities for production of feature films, television series, commercials, telethons, videos and all related facilities and audience participation” as well as “[i]ncidental community activities and social events” and “[r]elated office space and limited commercial retail sales.” SCMC §17.39.020(C)(2). To our knowledge, PCPOA has not asked the City Council to interpret or amend the SSD to pause or prohibit those uses. PCPOA’s reliance on the SSD to impede TMU’s land use while tolerating comparable uses underscores the legal deficiency of PCPOA’s position—and raises serious questions about whether PCPOA’s opposition to TMU’s land use has been motivated in any part by considerations other than legitimate, generally applicable land-use concerns.

3. As TMU’s representatives have already demonstrated in public statements to the City Council, PCPOA has made numerous false statements of fact concerning TMU and its land use at City Council meetings and in other forums—the pattern and substance of which TMU is documenting.

As a result of PCPOA’s sustained pattern of conduct targeting TMU’s lawful land use, TMU is forced to evaluate affirmative claims against PCPOA and its representatives, including but not limited to federal claims under the Fair Housing Act, 42 U.S.C. §§3604(b),

**MUNCK WILSON MANDALA LLP**

Ms. Lisabeth Rothman  
April 8, 2026  
Page 3

3617, and Civil Rights Act, 42 U.S.C. §§1983, 1985(3), as well as applicable California common-law and statutory claims. *See, e.g., Morris v. W. Hayden First Addition Homeowners Association, Inc.*, 104 F.4th 1128, 1142-43 (9th Cir. 2024) (“Unlawful interference occurs when [an HOA] meddles in or hampers an activity or process protected by the FHA,” including a “right to purchase and enjoy [real property] free from religious discrimination”). TMU expressly reserves all rights, claims, and remedies; and nothing in this correspondence is intended to, nor shall it, waive any of TMU’s rights, claims, or remedies.

In addition to the above-listed claims, should the City take any of PCPOA’s requested adverse actions against TMU, the university will vigorously defend its rights enumerated under the Religious Land Use and Institutionalized Persons Act (“RLUIPA”), 42 U.S.C. §2000cc *et seq.*, and the United States and California Constitutions. By way of example, if the City Council were to adopt PCPOA’s erroneous interpretation of the SSD as a restriction on TMU’s use for RHOPs or chapel construction, TMU would seek declaratory and injunctive relief that properly limits or invalidates the SSD to the extent it abridges TMU’s federal and state constitutional and statutory rights.

To be clear, we have no reason to believe the City will not continue its long track record of working amicably with the university. Indeed, the City’s track record is consistent with the clear statewide regulatory trend favoring both university and housing development. The California Legislature has acted repeatedly to curtail the use of local land-use processes to impede legitimate development—including, for example, AB 1307 (CAL. PUB. RES. CODE §21085), which prevents the use of CEQA to oppose housing development based on noise generated by residential occupants, and SB 79 (CAL. GOV. CODE §§65912.155–65912.162, effective July 1, 2026), which permits housing development by right near transit stations like the Newhall Metrolink station near TMU’s campus. These enactments are fundamentally incompatible with PCPOA’s present aims and underscore the legal and policy environment in which TMU’s claims would be evaluated.

While TMU has generally declined to respond to PCPOA’s prior protests and complaints out of a desire to remain gracious and maintain peaceful relations, TMU’s good faith has not been returned by PCPOA. Instead, PCPOA has escalated its course of conduct against TMU to the point of threatening the university’s important and recognized rights, needs, and development, leaving it no choice but to evaluate and prepare to pursue legal relief.

**II. Preservation Demand**

Should TMU be compelled to initiate litigation to defend its rights, all relevant documents and ESI in the possession of PCPOA and its representatives will be subject to direct or third-party discovery under the Federal Rules of Civil Procedure. PCPOA’s internal and external communications concerning TMU, its properties, and its land-use activities will be directly

**MUNCK WILSON MANDALA LLP**

Ms. Lisabeth Rothman  
April 8, 2026  
Page 4

relevant to central issues in dispute—including, without limitation, whether opposition to TMU’s land use has been motivated, in any part, by considerations other than legitimate, generally applicable land-use concerns. *See Morris*, 104 F.4th at 1144 (“[P]laintiffs in an FHA action need not prove that the discriminatory purpose was the *sole* purpose of the challenged action, they need only demonstrate that such a purpose was *a* motivating factor.”) (original emphasis).

We are confident that PCPOA shares TMU’s preference that this matter be resolved through the existing administrative process rather than through federal litigation, and this letter is sent in that cooperative spirit. But TMU must ensure that all relevant evidence is preserved in the event litigation becomes necessary.

Accordingly, TMU hereby demands that PCPOA immediately implement a litigation hold and take all steps necessary to identify, preserve, and prevent the destruction, alteration, or deletion of all documents and ESI in the possession, custody, or control of PCPOA, its officers, directors, board members, committee chairs, agents, representatives, and members acting in any official or representative capacity, that relate in any way to TMU, The Master’s Seminary, Grace Community Church, any affiliated person, church, or entity, or any real property owned, leased, or occupied by TMU or any affiliated entity in or around Placerita Canyon or the City of Santa Clarita. This obligation is continuing and applies to documents and ESI in the possession, custody, or control of PCPOA or its representatives that were created or received from January 1, 2009 to the present.

Without limiting the foregoing, the categories of relevant documents and ESI subject to this preservation demand include:

- (a) All email communications (whether sent via personal, organizational, or shared accounts), including attachments, drafts, and archived or deleted messages.
- (b) All text messages and SMS/MMS communications, regardless of the device or platform used.
- (c) All communications transmitted through ephemeral or disappearing-message applications, including but not limited to Signal, WhatsApp, Telegram, Snapchat, and any similar platform, as well as any settings enabling automatic deletion of such messages.
- (d) All inputs to and outputs from artificial-intelligence tools and large-language-model applications (including but not limited to ChatGPT, Claude, Gemini, Copilot, and similar platforms) used to draft, analyze, summarize, or otherwise process any communications, legal arguments, strategy memoranda, or other content relating to TMU or any of its affiliated properties or land-use activities.

**MUNCK WILSON MANDALA LLP**

Ms. Lisabeth Rothman

April 8, 2026

Page 5

- (e) All other writings, correspondence, memoranda, meeting minutes, agendas, notes, reports, presentations, and recorded or transcribed oral communications.
- (f) All social media posts, comments, direct messages, and group-chat communications on any platform (including Facebook, Instagram, Nextdoor, X/Twitter, and any private or members-only online forums or groups).
- (g) All communications with the City of Santa Clarita, its elected officials, City Manager, appointed commissioners, staff, consultants, employees, or agents, as well as any third parties, concerning TMU or any of the foregoing subject matter.
- (h) All photographs, videos, audio recordings, maps, surveys, studies, analyses, and other tangible or electronic materials relating to TMU, its properties, or its activities.
- (i) All documents and communications relating to PCPOA's interpretation, application, or invocation of the Placerita Canyon Special Standards District (SCMC §17.39.020), including any communications asserting that the SSD restricts any use or enjoyment of land, limits occupancy, or prohibits Residential High Occupancy Permits.
- (j) All documents and communications relating to Melody Ranch, the annual Cowboy Festival, the Shadowbox Film Studio, all proposed development of the approximate 98 vacant acres east of Railroad Ave. and north of 13th Street, or any other use or event within or adjacent to the SSD, including any PCPOA deliberation regarding whether to object or not object to such uses.

In addition to refraining from destroying or altering any relevant documents or ESI in or related to the categories listed above, PCPOA must take the following affirmative steps immediately: (1) issue a written litigation-hold notice (together with a copy of this letter) to all PCPOA officers, directors, board members, committee chairs, representatives, and any members who have participated in PCPOA's activities concerning TMU, directing them to preserve all potentially responsive materials; (2) suspend all routine document-destruction or data-retention policies to the extent they would result in the destruction of potentially relevant information; (3) disable any auto-delete or ephemeral-messaging settings on platforms used for communications; and (4) take reasonable steps to preserve backup copies of all relevant electronic communications and data stores. PCPOA's failure to take these and any other reasonable steps to preserve relevant information may give rise to sanctions for spoliation of evidence, including adverse-inference presumptions and instructions and monetary penalties. This letter, and proof of its delivery to you as counsel for PCPOA, will be offered as evidence of PCPOA's notice of its preservation obligations in the event any such remedies are sought.

Please confirm in writing, within ten (10) business days of the date of this letter, that PCPOA has implemented a litigation hold consistent with this demand and has taken all

**MUNCK WILSON MANDALA LLP**

Ms. Lisabeth Rothman  
April 8, 2026  
Page 6

affirmative steps described above, including written confirmation of the steps taken and persons notified. Should PCPOA have questions regarding the scope of this demand, we are available to confer on reasonable parameters; however, no such discussion shall relieve PCPOA of its immediate obligation to preserve all potentially relevant materials pending resolution.

**III. Disclosure to All PCPOA Stakeholders**

Given that only certain PCPOA representatives have publicly engaged in the course of conduct that exposes PCPOA to litigation and/or third-party discovery, there is a risk that all PCPOA stakeholders may not receive a balanced assessment of such exposure. TMU requests that this letter and an objective risk assessment be disclosed to all PCPOA officers, board members, representatives, voting members, and other relevant stakeholders.

\* \* \*

TMU has been a committed and constructive member of the Placerita Canyon community for over a half century and intends to remain so. TMU's preference is and has always been to resolve land-use matters through good-faith engagement in an objective and recognized administrative process. This preservation demand is a precautionary measure to ensure that relevant evidence is maintained should that process not yield a lawful outcome. We trust that PCPOA will approach this matter—and the administrative process ahead—with the same good faith and mutual respect, beginning with full compliance with this demand.

Respectfully,



Chase A. Cobern

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