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FILED
Superior Court Of California
County Of Los Angeles

APR 25 2014

Sherr K. Carter, Executive Officer/Clerk
By Amber Hayes, Deputy
Amber Hayes

5 Attorneys for Plaintiff,
6 Frank Bonvino

8 SUPERIOR COURT OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES – CENTRAL DISTRICT

10
11 FRANK BONVINO,
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13 Plaintiff,
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15 v.
16 LAS VIRGENES MUNICIPAL WATER
17 DISTRICT, PACIFIC HYDROTECH,
18 AECOM, and DOES 1 through 100,
19 Inclusive,
20
21 Defendant(s).

Case No.: BC54³637
[Complaint Filed April 24, 2014]
[Dept.28]
[Assigned to Hon. Yvette Palazuelos for all purposes]
**PLAINTIFF FRANK BONVINO'S
NOTICE OF ERRATA RE EXHIBIT B TO
COMPLAINT**

22 **TO THE COURT, DEFENDANTS AND THEIR RESPECTIVE ATTORNEYS OF
23 RECORD:**

24 Due to inadvertence and an oversight, Exhibit B to Plaintiff Frank Bonvino's
25 Complaint contains the incorrect exhibit, which occurred unintentionally.

26 As such, attached hereto is the correct Exhibit "B" which should be substituted and
27 used and which replaces the Exhibit "B" attached to the Complaint.
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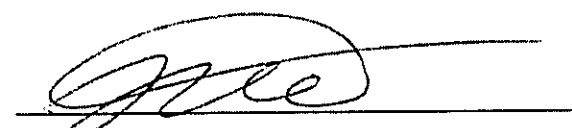
04/25/2014

BY FAX

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Respectfully Submitted,

DATED: April 25, 2014



John V. Tamborelli, Esq.
Tamborelli Law Group
Attorney for Plaintiff Frank Bonvino

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EXHIBIT B

TAMBORELLI LAW GROUP

A PROFESSIONAL LAW CORPORATION

John V. Tamborelli, Esq. | Director

JTamborelli@lawtlg.com

April 24, 2014

David Lippman
Director, Facilities & Operations
Las Virgenes Municipal Water District
4232 Las Virgenes Road
Calabasas, CA 91302

NOTICE OF COMMENCEMENT OF LEGAL ACTION

Re: Frank Bonvino v Las Virgenes Municipal Water District et. al.

Dear David Lippman:

My office has been retained to represent Mr. Frank Bonvino in the above-referenced matter. Please be advised that my client has filed a Verified Complaint for Declaratory Relief; Injunctive Relief; and Nuisance civil lawsuit for CEQA violations and a motion to enjoin. The Water District will be served with the Complaint. In addition to civil complaint, Plaintiff will seek a preliminary injunction to suspend LVMWD's approval of tank construction and all development and construction operations authorized while a complete and proper EIR process is completed, or mediated negotiations regarding steps necessary with Plaintiff and group representatives of all parties impacted, including a selection of residents, City of Westlake Village, Los Angeles County Health Department, geotech engineers and emergency response representatives—this injunction shall be in effect during the pendency of the instant litigation and shall enjoin, all Defendants, and each of them, their agents, servants, and employees, and all persons acting under, or in concert with, or for them.

/s/

John V. Tamborelli, Esq.

04/25/2014

TLG

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EX B