

August 1, 2016

Palisair Homeowners Association  
Francine Kirkpatrick, President:  
Diana Ungerleider, Secretary  
P.O. Box 901  
Pacific Palisades, CA 90272

Re: *Kojan – document inspection request*

Dear Ms. Kirkpatrick and Ms. Ungerleider:

I represent Mr. and Mrs. **Kojan**, the owners of 16016 Anoka Drive.

The PHOA's CC&Rs provide in Art. IV, §1: "The files of the Committee, including its Book of Minutes, shall be open for inspection by any landowner of the tract at all reasonable times." My clients' document inspection and copying rights are also provided by *Civ. Code* §§5200, *et seq.* and *Corporations Code* §§8320, *et seq.*

This letter is to request that the Palisair Homeowners Association (**PHOA**) produce for inspection and copying the documents requested below:

1. The PHOA's "governing documents," as that term is defined *Civil Code* § 4150, which statute provides: "Governing documents' means the declaration and any other documents, such as bylaws, operating rules, articles of incorporation, or articles of association, which govern the operation of the common interest development or association."
2. **SCHULMAN'S** application or request to replace the **FENCE**.  
  
(**SCHULMAN** means Miriam Schulman, and includes her contractors, agents, attorneys, and any other person who purported to act on her behalf.)  
  
(**FENCE** means the wood fence between SCHULMAN's PROPERTY (16006 Anoka Drive) and KOJAN's property (16016 ANOKA), which SCHULMAN replaced in or about July 2016, with a glass fence.)
3. All PHOA minutes that discuss or concern Miriam Schulman's application or request to replace the FENCE.
4. All documents in the PHOA's "**FILE**" regarding the FENCE.

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(**FILE** means as provided CC&Rs Art. IV, §1: “The files of the Committee, including its Book of Minutes, shall be open for inspection by any landowner of the tract at all reasonable times.”)

5. All documents in the PHOA’s **“FILE”** regarding its investigation whether the existing wood FENCE violated CC&R Art. III, §9 or any other provision.
6. All documents in the PHOA’s **“FILE”** regarding whether the wood FENCE unreasonably obstructed or unreasonably diminished the quality and nature of the view from any other lot.
7. All documents in the PHOA’s **“FILE”** regarding it issued a notice as provided CC&R Art. III, §9 that the existing wood FENCE violated the CC&Rs.
8. All documents in the PHOA’s **“FILE”** regarding whether KOJAN or SCHULMAN owned the FENCE.
9. All emails to/from, SCHULMAN any PHOA Board member regarding the FENCE.
10. All emails to/from, SCHULMAN any PHOA Board member regarding KOJAN.

We request that you respond to this letter within seven days and that the PHOA produce the documents for inspection and copying within fourteen days.

Very truly yours,



Keith Turner