

City of Anaheim  
**OFFICE OF THE CITY ATTORNEY**



October 27, 2022

**Via U.S. Mail and email at [aabshez@loeb.com](mailto:aabshez@loeb.com)**

Allan J. Abshez  
Loeb & Loeb, LLP  
Two Embarcadero Center  
Suite 2320  
San Francisco, CA 94111

Re: Response to Angels Baseball's Notice of Default Under Amended  
and Restated Stadium Lease Agreement

Dear Mr. Abshez:

This responds to your letter dated September 29, 2022 and in particular, to the notice of default you provided under Section 31 of the Amended and Restated Lease Agreement between Angels Baseball, LP and the City of Anaheim ("Lease").

In short, we disagree that the City's intent to build Fire Station No. 12 on the site that the parties had previously mutually agreed would be best suited for this important health and safety improvement violates the Lease. As you are aware, Fire Station No. 12 fulfills an important safety mandate of Subsequent Environmental Impact Report (SEIR) No. 339 for the Revised Platinum Triangle Expansion Project, which increased the residential, commercial, office, and industrial intensities permitted in the Platinum Triangle. Fire Station No. 12 is necessary to address delays in Anaheim Fire and Rescue's response times for first engine response and ensure adequate fire protection services in the Platinum Triangle, and improve life safety service to the stadium's current events and attendees. Construction of Fire Station No. 12 is consistent with the Angels Lease, which preserved the City's right to construct certain facilities and supporting infrastructure in the exact location identified for Fire Station No. 12 in the Master Plan.

Furthermore, in constructing the Fire Station, the City would be committed to continuing to satisfy all of its obligations under the Lease including, but not limited to, providing no fewer than 12,500 surface parking spaces on the Stadium Site.


Having said that, due solely to your threat of litigation and the uncertainty it creates, this letter will confirm that, at this time and until further notice, the City will not move forward with construction of Fire Station No. 12. However, the City will continue with the design of a Fire Station as it sees fit. The City reserves all rights it may have

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to recover from Angels Baseball any damages caused by the delay or cancelation of Fire Station No. 12 construction.

Sincerely,

ROBERT FABELA, CITY ATTORNEY

By:   
Robert Fabela  
City Attorney

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