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18 Attorneys for Defendants

19 ROBERT LUGLIANI and DOLORES A.LUGLIANI,

20 as co-trustees of THE LUGLIANI TRUST,

21 THOMAS J. LUGLIANI, TRUSTEE,

22 THE VIA PANORAMA TRUST

14 SUPERIOR COURT OF CALIFORNIA
15 COUNTY OF LOS ANGELES, CENTRAL DISTRICT

16 CITIZENS FOR ENFORCEMENT OF
17 PARKLAND COVENANTS,

18 Plaintiff,

19 vs.

20 CITY OF PALOS VERDES ESTATES, a
21 municipal corporation; PALOS VERDES
22 HOMES ASSOCIATION, a California
23 corporation; DOLORES A. LUGLIANI and
24 DELORES A. LUGLIANI, as co-trustees of
25 THE LUGLIANI TRUST; THOMAS J.
26 LUGLIANI, TRUSTEE, THE VIA
27 PANORAMA TRUST U/DO MAY 2, 2012
and DOES 1 through 20

28 Defendants.

Case No.: BS142768

Hon. Barbara A. Meiers; Dept. 12

**DECLARATION OF DAN BOLTON IN
SUPPORT OF DEFENDANTS PALOS
VERDES HOMES ASSOCIATION; ROBERT
LUGLIANI AND DOLORES A. LUGLIANI, AS
CO-TRUSTEES OF THE LUGLIANI TRUST;
AND THOMAS J. LIEB, TRUSTEE, THE VIA
PANORAMA TRUST U/DO MAY 2, 2012'S
OPPOSITION TO PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT OR SUMMARY
ADJUDICATION OR BOTH**

Hearing Date: May 29, 2015

Hearing Time: 10:30 a.m.

Department: 12

Action Filed: May 13, 2013

Trial Date: None Set

4831-7765-9939.1

DECLARATION OF DAN BOLTON IN SUPPORT OF FACTS IN SUPPORT OF DEFENDANTS PALOS VERDES
HOMES ASSOCIATION, ROBERT LUGLIANI AND DOLORES A. LUGLIANI, AND THOMAS J. LIEB'S
OPPOSITION TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT AND/OR ADJUDICATION

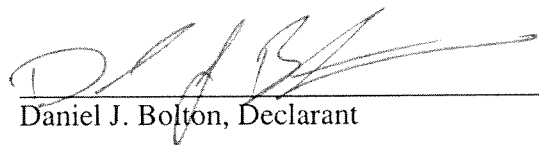
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I, Daniel J. Bolton, declare and state as follows:

1. I am the President of Bolton Engineering Corp. and a licensed civil engineer. A true and correct copy of my resume is attached hereto as Exhibit A.
2. Bolton Engineering Corp was engaged by the Via Panorama Trust to survey the property located at 900 Via Panorama Drive, Palos Verdes Estates, California 90274 and the adjacent property referred to as "Area A" which was being purchased by the Via Panorama Trust from the Palos Verdes Homes Association.
3. As part of Bolton Engineering Corp's survey work, I visited the site, our staff conducted a survey of the property and prepared an "Overall Plan" of the properties in question overlaid on a topographical map ("Via Panorama Topographical Map"). A true and correct copy of the Via Panorama Topographical Map Bolton Engineering Corp. prepared is attached hereto as Exhibit B.
4. As is seen on the Via Panorama Topographical Map, the area shown as Area 1 contains some relatively steep slopes, Area 2 contains moderate, varying slopes and Area 3 is predominately a flat pad.
5. Based on my expertise as a civil engineer and review of the topography Area A, of the three denoted Areas, Area 1 would be the most difficult to develop given the relatively steep slopes.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on March 6, 2015, at Lomita, California.



Daniel J. Bolton, Declarant

EXHIBIT A

Bolton Engineering Corporation

25834 Narbonne Avenue #210
Lomita, Calif, 90717
Phone (310) 325-5580

Curriculum Vitae for Daniel J Bolton

Daniel J. Bolton is President and Principal of Bolton Engineering Corporation. Mr. Bolton joined the firm in this capacity in August 2003 and oversees structural engineering, land development, and grading, drainage, and utility projects for the firm. The firm currently employs a staff of ten, including engineers, drafters, and Land Surveyors, providing Land Surveying and Civil and Structural Engineering services primarily in Southern California.

Prior to joining the firm, Mr. Bolton was employed for two years with Wood Rodgers, Inc., a Civil Engineering firm in Sacramento, California, and three years with KASL Consulting Engineers, Inc., a Civil Engineering firm in Citrus Heights, California. During this time, Mr. Bolton provided master planning for a 240 acre planned development, civil engineering services for over 600 units of federally owned military family housing throughout the United States, design and management of arterial roadway improvements, major drainage improvements for the County of Placer, structural and traffic engineering design of land-side improvements at Fresno-Yosemite International Airport, as well as smaller civil and structural projects local to the Northern California area.

Recent projects include overseeing grading, drainage, utility, and structural engineering for Highridge Condominiums, a 28 unit condominium project in Rancho Palos Verdes; providing structural engineering for the Pasadena Eco-House, the first LEED Platinum-certified single family residence in the continental United States; providing civil and structural engineering for the Brickwalk Townhomes, a new development of 140 units in Palos Verdes which also involves the repair of a landslide, and structural engineering for a new library at the Montemalaga Elementary School campus.

Mr. Bolton also oversees the firm's ongoing work in the Los Angeles area providing structural engineering services in the areas of foundation review, soundness, and upgrading; structural retrofit and improvement, new construction of residential and commercial structures, and earth retaining structures.

Mr. Bolton holds a Bachelor of Science degree in Civil Engineering from California Polytechnic State University, San Luis Obispo and is registered as a Civil Engineer in the State of California (RCE 63290).

EXHIBIT B

CONSTRUCTION NOTES

EROSION CONTROL
 AREA OF DRIPS FROM ROOFS DRAIN TO LEFT OF CAUSEWAY. PLANTING AND GRADE ADJUSTMENT TO EXISTING PROTECT DRAINAGE VENT IN PLACE. SEE NOTES BELOW.

RETAINING WALL
 AREA TO BE STRIPPED OF VEGETATION. REMOVE GRADE AND FINISH WITH:

RETAINING WALL
 AREA 1 REMAINS TO PROTECT IN PLACE PER PLANNING APPLICATIONS. FINISH ACCESS AND BULK SPACE OF CURB PER PLANNING. SEE NOTES BELOW.

EROSION CONTROL
 EXISTING RETAINING WALL PER PLANNING APPLICATION.

1 EXISTING PRECAST CONCRETE UNDER RETAINING WALL. HEIGHT AS SHOWN. PER PLANNING APPLICATION.

2 EXISTING CONCRETE ALTERNATE BLOCK RETAINING WALL. HEIGHT AS SHOWN. PER PLANNING APPLICATION.

3 EXISTING PRECAST CONCRETE ACCESS PER PLANNING APPLICATION.

4 EXISTING CONCRETE DRAINAGE DRAINAGE AND OUTFALL. PER PLANNING APPLICATION.


5 REMOVE EXISTING CONCRETE PLUS OTHER HARDWARE AND REINFORCEMENT.

6 REMOVE EXISTING AND/OR GRADE STRUCTURES.

7 REMOVE EXISTING GRASS AREA. REGRADE TO GRADE.

8 EXISTING STRAIGHT ACCESS TO DETECT BARRIERS BEHIND WALLS. PER PLANNING APPLICATION.



<p>David Lugianni, Civil Engineer 900 Via Panorama Palmdale, CA 93550 License No. 54312</p> 	<p>DAVID LUGLIANI 900 Via Panorama Palmdale, CA 93550</p>	<p>OVERALL PLAN Lot 10, 11, and Par. A, Tract 8652</p>	<p>1</p>
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