

## NORTH SACRAMENTO LAND COMPANY



November 29, 2021

Dear Owners and Tenants of Johnston Industrial Park,

Allow me to introduce myself, I work for NSLC, the original developer of Commerce Circle and Lathrop Way. We currently still own 12 of the commercial buildings. I know you are all very aware of the illegal parking, camping, and littering in the park. We and others have tried in vain to have the street people and homeless removed.

We would now like to follow the lead of Railroad Drive, less than a mile away to file a complaint against the City of Sacramento.

NSLC has retained the law firm of Weintraub/tobin for their help. NSLC has committed to contribute 20% of these fees. We are looking to the rest of the park's owners, and tenants to contribute the remaining fees. For your information the fees spent on Railroad Ave lawsuit currently stand at \$25,000. As a result, the streets are clear!

I am sure everyone is sick and tired of the horrible and disgusting situation. We must take action now!

Please contact me for any additional information and your financial commitment.

Respectfully,

A handwritten signature in blue ink that reads "Jack A. Greer". The signature is fluid and cursive.

Jack A. Greer

Vice President

916.796.5519

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**weintraub | tobin**

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November 23, 2021

**Via Email**

Jack Greer  
North Sacramento Land Company  
400 Slobe Avenue  
Sacramento, CA 95815

Re: Litigation Against the City of Sacramento

Dear Jack:

As you requested, I've prepared this email outlining the issue central to the dispute with the City of Sacramento and my initial thoughts concerning a budget. To start, the issue is that the City of Sacramento has abandoned the areas near and around Lathrop Drive and Commerce Circle, rendering the area a containment zone where the homeless are allowed to live free of the laws. This has resulted in waste, property damage, private and public nuisances, and even murder. North Sacramento Land Company has made numerous requests to the City of Sacramento to rectify the issue, as the homeless are breaking a variety of laws, including illegally parking their vehicles, loitering, drug dealing, drug use, etc. Unfortunately, the City of Sacramento has not responded in a meaningful manner.

As a result, we're left with no choice but to send the City of Sacramento a demand letter. If they refuse to take action, we will then need to proceed with a complaint against the City of Sacramento similar to the one that was filed by Railroad Drive 1900, LLC. I will not go into depth concerning strategy in this email because I don't want to risk a waiver of the attorney-client privilege. If we file that complaint, however, I suspect the City will file a motion to dismiss just like it did in the Railroad Drive litigation, and we will need to oppose that motion.

As we've discussed, I think that \$50,000 in fees would constitute a reasonable benchmark for NSLC and the other property owners to assess the progress made toward a resolution with the City. At that point, the owners can determine what progress has been made and whether it makes sense to pursue the matter any further. As you know, litigation can easily cost six to seven figures in fees, especially when its adverse to a party like the City of Sacramento. Our hope, obviously, is that they come to the table relatively early on, but that is out of our control.

Jack Greer  
November 23, 2021  
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Please let me know if you need any additional information.

Respectfully,

**weintraub|tobin**



Josh H. Escovedo

JHE/sm