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9 Attorney for Defendants
JAIME DE JESUS GONZALEZ and
10 LINDA MANSDORF

11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13 FOR THE COUNTY OF LOS ANGELES

14 ALTA STANDARD ONE, LLC

15 Plaintiffs,

16 v.

17 JAIME DE JESUS GONZALEZ, *et al.*

18 Defendants

) CASE NO. 13U00769

)
)
) DECLARATION OF ABE SOLEIMANI
) IN SUPPORT OF DEFENDANTS' *EX*
) *PARTE* APPLICATION TO STAY
) EXECUTION OF WRIT OF
) POSSESSION PURSUANT TO CCP §§
) 918, 918.5, 1176

) Date: July 1, 2013
) Time: 1:30 pm
) Dept: S

19
20
21
22 I, ABE SOLEIMANI, declare as follows:

23 1. I am over the age of 18 and am not a party to this action. I have personal
24 knowledge of all matters set forth within this declaration except as to those matters set forth on
25 information and belief and, as to those matters, I believe them to be true. If called as a witness, I
26 could and would competently testify with respect to the matters set forth within this declaration.
27 2. I am a Commercial and Residential real estate broker licensed in the state of
28 California, License No. 00593861. I have been continuously engaged in performing real estate

FILED
LOS ANGELES SUPERIOR COURT

JUL 01 2013

JOHN A. CLARKE, CLERK
A. Fastel
BY L. FASTEL, DEPUTY

1 services since 1975. I presently work for Coldwell Banker in its residential division at its offices in
2 Beverly Hills. I have worked there since 1990. During the course of my career, on behalf of my
3 clients I have sold over 75 residential properties in Beverly Hills and have leased more than 30
4 residential properties in Beverly Hills. I have extensive knowledge of the rental and sale values of
5 residential property in the City of Beverly Hills.

6 3. I have recently inspected the 5,239 square foot house located at 811 N. Alta
7 Drive, Beverly Hills, California 90210 for purposes of evaluating the house for rental value. To
8 assist me in determining the rental value of the home, I also have consulted the extensive Multiple
9 Listing Services (MLS) real estate data base for comparable properties for lease in Beverly Hills and
10 similar surrounding areas. Attached hereto are copies of listings for five recent comparable
11 properties that were leased in the area.

12 4. The house is in a state of significant disrepair. The paint has deteriorated
13 throughout and appears not to have been redone in many years. The carpeting throughout the home
14 is stained and worn. The landscaping is overgrown and dying. The paved areas throughout the
15 property are cracked and appear to not have properly been maintained. The kitchen and bathrooms
16 and their fixtures are decades old and in poor condition. The plumbing and electrical systems are
17 also original and should be replaced with modern copper plumbing and electrical wiring and outlets.
18 The present condition of the house and the property would make leasing it very difficult, if not
19 impossible.

20 5. Based on my inspection and my knowledge of the real estate market for
21 similar homes in that particular area of Beverly Hills, it is my opinion that the best value for the
22 property would be obtained by demolishing the improvements to the property and building a new
23 home upon it. Without doing that, even if fully refurbished, the home would not be of comparable
24 value to the other homes in the immediate area. This is because the homes in the immediate area
25 are of significantly newer construction. In its present condition, it is my opinion that the only
26 market interest in the property would be as a "tear down" for the land value. Given the condition of
27 the house, the bulk of the property's value is in the land to build a new house like the one
28 immediately next door to it.

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6. In its present condition, it is my opinion that, if the house could be leased at all, its maximum rental value would be no more than \$7,500-\$10,000 per month. But to even obtain that amount, at a bare minimum, any tenant would require the house to be thoroughly cleaned, painted, and entirely recarpeted. The landscaping would also have to be redone. At a minimum, I would expect that it would cost more than \$100,000.00 to bring the house and property to a condition that would render it leasable.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on June 28, 2013 at Beverly Hills, California.

Abe Soleimani

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PROOF OF SERVICE

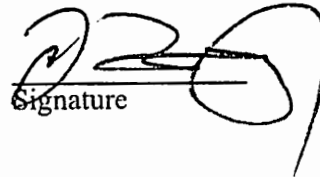
STATE OF CALIFORNIA)
) ss.
COUNTY OF LOS ANGELES)

I, the undersigned, certify and declare that I am over the age of 18 years, employed in the County of Los Angeles, California, and am not a party to the within action; my business address is 2049 Century Park East, Suite 2460, Los Angeles, California 90067. On June 21, 2013, I served the following document described as **DECLARATION OF ABE SOLEIMANI IN SUPPORT OF DEFENDANTS' EX PARTE APPLICATION TO STAY EXECUTION OF WRIT OF POSSESSION PURSUANT TO CCP §§ 918, 918.5, 1176** on the interested parties in this action by personally handing a copy of it to counsel for plaintiff Alta Standard One, LLC, Wayne Abb.

XXXXX (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on July 1, 2013, at Los Angeles, California.

Loren J. Beck
Type or Print Name


Signature

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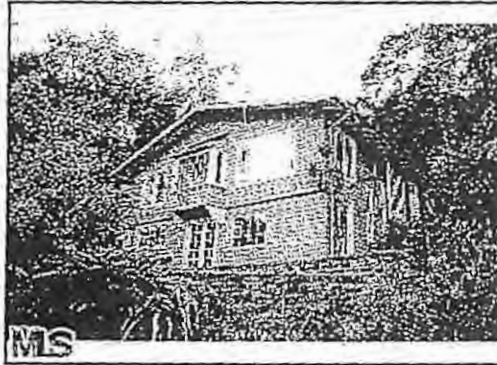


Abe Soleimani
Coldwell Banker, Beverly Hills North
310-777-6260
abesoleimani@aol.com 310-278-7192 Fax

STATUS: Sold

ADDRESS: 2323 STANLEY HILLS DR, LOS ANGELES, CA 90046

SP: \$7,950



CLICK HERE TO VIEW
THE MAP IMAGE!

[Larger Map](#) [Aerial Map](#) [Plat Map](#)

Add'l Photos

RESIDENTIAL LEASE AREA: (3) Sunset Strip - Hollywood Hills West		MAP: 592/13	MLS# 13-653665	BR: 3
STYLE: Craftsman	SUB:	PUD:	YB: 1991	BA: 3.00
APN: 5567-004-048	SFR/CA: SFR	HOD: \$0.00	STORIES: 0	APX SF: 2,488/AS
UNIT LOC: N/A	VIEW: Yes	POOL: No	#UNITS: 2	APX LSZ: 19,525/AS
EXP: N/A	GH: Det'd	#FP: 2	FLR#: 0	PKGT: 0
BALC: N/A	SALE: No	LOP: No	FUR: Yes	#CVD PKG: 2
HORSE PROP:	OPT \$:	OPTT:	PETS: Yes	SDEP: \$14,000
ELEM:	JRHS:	SRHS:	COMPLEX: Stanley Hills Estate	TERM: 1+Year

DIRECTIONS: Laurel Canyon Blvd to Lookout Mountain to Stanley Hills Drive.

REMARKS: A gorgeous fully furnished & remodeled 3bed/2bath with a large detached guest house on Hollywood Hills. This house features a gourmet kitchen with high end ss appliances, an open concept living-room with a centerpiece fireplace, hardwood floors throughout and four elaborate gardens with breath-taking views of the Canyon. This property is great for outdoor entertainment, just minutes from Sunset Plaza and all the major studios. It's zoned for Wonderland elementary school. [Community Data](#) [Walk Score](#)

ROOMS: Art Studio, Bonus, Breakfast Bar, Dining Area, Guest House, Library/Study, Living, Patio Open, Other**AMENIT:** Extra Storage, Security, Separate Guest Room, Other**EQUIP:** Alarm System, Barbeque, Built-Ins, Ceiling Fan, Dishwasher, Dryer, Freezer, Garbage Disposal, Hood Fan, Intercom, Microwave, Phone System, Range/Oven, Refrigerator, Trash Compactor, Washer**AIR:** Central**FLOOR:** Hardwood, Tile**FIREPL:** Dining, Living Room**POOL:** None**PARK:** Detached, Door Opener, Garage - 2 Car, Side By Side**VIEW TYPE:** Canyon**SEC:****SEWER:****DISC:** As Is**OCC/SHOW:** Call LA 1**HEAT:** Central**LAUNDRY:** Outside, Room**ROOF:****TENANT PAYS:** Cable TV, Electric, Gardener, Gas, Trash, Water**TYPE:** Single Family**WATERFRONT:****POSS:****SZONE:****SPA:**

LP: \$7,950

DOM: 12

LD: 02/23/2013

SP: \$7,950

SSP: BLOG Y/N: Yes

LP/SF: \$3.20

OLP: \$7,950

CDOM: 12

CD: 03/07/2013

SD: 03/07/2013

WD: AVM Y/N: Yes

SP/SF: \$3.00

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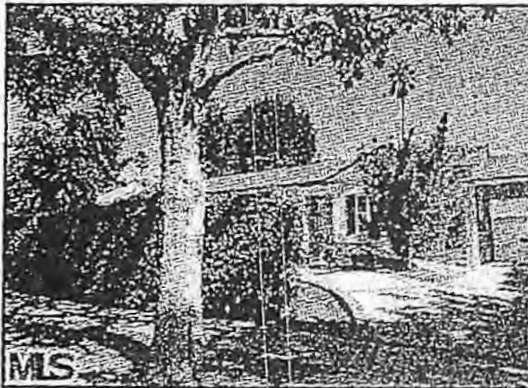


Abe Soleimani
Coldwell Banker, Beverly Hills North
310-777-6260
abesoleimani@aol.com 310-278-7192 Fax

STATUS: Sold

ADDRESS: 514 N CAMDEN DR, BEVERLY HILLS, CA 90210

SP: \$6,000



CLICK HERE TO VIEW
THE MAP IMAGE!

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[Virtual/Photo Tour](#) [Add'l Photos](#)

RESIDENTIAL LEASE

STYLE: Traditional

APN: 4345-025-023

UNIT LOC: N/A

EXP: N/A

BALC: N/A

HORSE PROP:

ELEM:

AREA: (1) Beverly Hills

SUB:

SFR/CA: SFR

VIEW: No

GH: Det'd

SALE: No

OPT \$:

JRHS:

MAP: 632/F1

PUD:

HOD: \$0.00

POOL: Yes

#FP:

LOP: No

OPTT:

SRHS:

MLS# 12-630585

YB: 1924

STORIES: 1

#UNITS: 0

FLR#: 0

FUR: No

PETS: Call

COMPLEX none

BR: 3

BA: 2.75

APX SF: 2,639/AS

APX LSZ: 12,859/AS

PKGT: 2

#CVD PKG: 2

SDEP: \$17,600

TERM: 1-Year

DIRECTIONS: N/Santa Monica Blvd W/Beverly Dr

REMARKS: CHARMING UPDATED TRADITIONAL HOME WITH A CIRCULAR DRIVEWAY. MAIN HOUSE - 3BR + 2.75 BA, POWDER ROOM, FORMAL ENTRY, GRAND LIVING ROOM, FORMAL DINING ROOM, KITCHEN WITH STAINLESS STEEL APPLIANCES, BREAKFAST NOOK. MASTER WITH SITTING AREA AND PRIVATE BATH. 2 BEDROOMS WITH PRIVATE BATH. FAMILY ROOM WITH FIREPLACE LEADS OUT TO THE BACKYARD AND POOL. NEW CARPET AND PAINT. GUEST HOUSE WITH MAID'S ROOM AND BATH.

[Community Data](#) [Walk Score](#)

ROOMS: Breakfast Area, Dining, Family, Living, Powder**AMENIT:** Pool**EQUIP:** Range/Oven, Refrigerator**AIR:** None**FLOOR:** Carpet, Parquet**FIREPL:** Family Room**POOL:** Private**PARK:** Carport, Detached, Garage**VIEW TYPE:** None**SEC:****SEWER:****DISC:** As Is**OCC/SHOW:** Listing Agent Accompanies**HEAT:** Central**LAUNDRY:** Garage**ROOF:****TENANT PAYS:** Electric, Gardener, Gas, Pool Service, Water**TYPE:** Single Family**WATERFRONT:****POSS:****SZONE:** Other**SPA:** None

LP: \$7,999

DOM: 111

LD: 10/17/2012

SP: \$6,000

SSP: BLOG Y/N: Yes

LP/SF: \$3.03

OLP: \$8,800

CDOM: 111

CD: 02/05/2013

SD: 02/05/2013

WD: AVM Y/N: Yes

SP/SF: \$2.00

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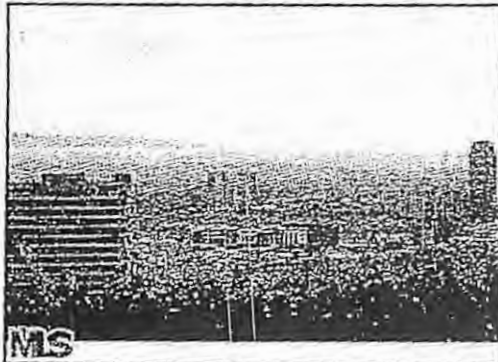


Abe Soleimani
Coldwell Banker, Beverly Hills North
310-777-6260
abesoleimani@aol.com 310-278-7192 Fax

STATUS: Sold

ADDRESS: 9305 WARBLER WAY, LOS ANGELES, CA 90069

SP: \$6,500



CLICK HERE TO VIEW
THE MAP IMAGE!

[Larger Map](#) [Aerial Map](#) [Plat Map](#)

Virtual/Photo Tour Add'l Photos

RESIDENTIAL LEASE

STYLE: Contemporary Mediterranean

APN: 5561-014-015

UNIT LOC: N/A

EXP: N/A

BALC: N/A

HORSE PROP:

ELEM:

AREA: (3) Sunset Strip - Hollywood Hills West

SUB:

SFR/CA: SFR

VIEW: Yes

GH: None

SALE: No

OPT \$:

JRHS:

MAP: 592/H5MLS# 12-632683BR: 4

PUD:

HOD: \$0.00

POOL: No

#FP: 2

LOP: No

OPT:

SRHS:

YB: 1964

STORIES: 1

#UNITS: 1

FLR#: 0

FUR: Yes

PETS: Call

COMPLEX N/A

BA: 4.00

APX SF: 2,748/AS

APX LSZ: 4,750/AS

PKGT: 2

#CVD PKG: 2

SDEP: \$14,000

TERM: 1+Year

DIRECTIONS: Doheny Dr., North to Warbler Way

REMARKS: Sophisticated contemporary Mediterranean celebrity hideaway in fabulous "Bird Streets" offers privacy and explosive city to ocean views. Great living and dining rooms w/ floor to ceiling windows and head on city view open to wrap around tiled patios. Sumptuous Master Suite w/ showstopping views, luxurious marble bath w/spa tub+steam. 3 more bedrooms w/ great closet spaces and updated baths.

Spacious 2 car garage, security, central A/C, outdoor Spa. Available 1/1/2013.

[Community Data](#)
[Walk Score](#)
ROOMS: Dining Area, Living, Patio Open, Powder**AMENIT:** None**EQUIP:** Dishwasher, Dryer, Garbage Disposal, Hood Fan, Microwave, Range/Oven, Refrigerator, Washer**AIR:** Central**FLOOR:** Hardwood, Stone**FIREPL:** Living Room, Master Bedroom**POOL:** None**PARK:** Attached, Garage**VIEW TYPE:** City Lights, Ocean**SEC:****SEWER:****DISC:** As Is**OCC/SHOW:** Appointment w/List. Office, Listing Agent Accompanies, Tenant**HEAT:** Central**LAUNDRY:** Garage**ROOF:****TENANT PAYS:** Other**TYPE:** Single Family**WATERFRONT:****POSS:****SZONE:** Property Report**SPA:** Hot Tub, Private

LP: \$7,000

DOM: 79

LD: 10/30/2012

SP: \$6,500

SSP: BLOG Y/N: Yes

LP/SF: \$2.55

OLP: \$7,000

CDOM: 79

CD: 01/17/2013

SD: 01/17/2013

WD: AVM Y/N: Yes

SP/SF: \$2.00

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000825



Abe Soleimani
Coldwell Banker, Beverly Hills North
310-777-6260
abesoleimani@aol.com 310-278-7192 Fax

STATUS: Sold

ADDRESS: 2008 WHITLEY AVE, LOS ANGELES, CA 90068

SP: \$7,500



CLICK HERE TO VIEW
THE MAP IMAGE!

[Larger Map](#) [Aerial Map](#) [Plat Map](#)

RESIDENTIAL LEASE AREA: (3) Sunset Strip - Hollywood Hills West
STYLE: Spanish **SUB:**
APN: 5575-004-014 **SFR/CA:** SFR
UNIT LOC: N/A **VIEW:** Yes
EXP: N/A **GH:** None
BALC: N/A **SALE:** Yes
HORSE PROP: **OPT \$:**
ELEM: **JRHS:**

MAP: 593/E3 **MLS#** 13-678953
PUD: **YB:** 1926
HOD: \$0.00 **STORIES:** 0
POOL: No **#UNITS:** 1
#FP: **FLR#:** 1
LOP: No **FUR:** No
OPTT: **PETS:** Call
SRHS: **COMPLEX** 2008 Whitley Ave

BR: 4
BA: 3.00
APX SF: 3,981/VN
APX LSZ: 5,840/VN
PKGT: 1
#CVD PKG: 1
SDEP: \$16,000
TERM: 1+Year

DIRECTIONS: East of Highland, West of Cahuenga, North of Franklin

REMARKS: Authentic Spanish Revival in the historic area of Whitley Heights where several Hollywood stars have called home. Stunning views of the city, Griffith Observatory and the Capitol Records building. Original details, wood floors and tile throughout. From the gated lushly landscaped front yard you enter the double story entry with sweeping staircase and stained glass window. Inside there is a step down living room with coved ceiling and fireplace, formal dining room, chef's kitchen with Viking appliances, granite counters, breakfast area and powder room on the main floor. On the second floor is the master bedroom with remodeled spa like en suite bath plus his and hers closets, 2 additional large bedrooms and another updated bathroom. On the lower level is a family room with fireplace, the 4th bedroom with en suite bath and laundry area. This area could also be used as a separate apartment or office space. A lovely landscaped back yard completes this grand home. [Community Data](#) [Walk Score](#)

ROOMS: Bonus, Breakfast, Dining, Entry, Living, Master Bedroom, Patio Covered

AMENIT: Other

EQUIP: Dishwasher, Dryer, Garbage Disposal, Hood Fan, Range/Oven, Refrigerator, Washer

AIR: Air Conditioning

FLOOR: Carpet, Hardwood, Tile

FIREPL: Family Room, Living Room

POOL: None

PARK: Garage

VIEW TYPE: City Lights

SEC:

SEWER:

DISC: None

OCC/SHOW: 24-hr Notice

HEAT: Central

LAUNDRY: Laundry Area

ROOF:

TENANT PAYS: Other

TYPE: Single Family

WATERFRONT:

POSS:

SZONE:

SPA:

LP: \$8,000

DOM: 18

LD: 06/03/2013

SP: \$7,500

SSP: **BLOG Y/N:** Yes

LP/SF: \$2.01

OLP: \$8,000

CDOM: 18

CD: 06/21/2013

SD: 06/21/2013

WD: **AVM Y/N:** Yes

SP/SF: \$1.88

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Abe Soleimani
Coldwell Banker, Beverly Hills North
310-777-6260
abesoleimani@aol.com 310-278-7192 Fax

STATUS: Sold

ADDRESS: 8573 APPIAN WAY, LOS ANGELES, CA 90046

SP: \$5,995



CLICK HERE TO VIEW
THE MAP IMAGE!

[Larger Map](#) [Aerial Map](#) [Plat Map](#)

[Virtual/Photo Tour](#) [Add'l Photos](#)

RESIDENTIAL LEASE

STYLE: Contemporary

APN: 5562-012-012

UNIT LOC: N/A

EXP: N/A

BALC: Covered

HORSE PROP: No

ELEM: Wonderland

Elementary

AREA: (3) Sunset Strip - Hollywood Hills

West

SUB:

SFR/CA: SFR

VIEW: Yes

GH: None

SALE: No

OPT \$:

JRHS: Check w/City

MAP: 592/J3

PUD:

HOD: \$0.00

POOL: Yes

#FP: 1

LOP: No

OPTT:

SRHS: Check
w/City

MLS# 12-

641833

YB: 1952

STORIES: 2

#UNITS: 1

FLR#: 1

FUR: No

PETS: No

COMPLEX N/A

BR: 2

BA: 3.00

APX SF: 1,853/AS

APX LSZ: 5,201/AS

PKGT: 4

#CVD PKG: 2

SDEP: \$12,000

TERM: 1+Year, 1-
Year

DIRECTIONS: Laurel Canyon, Left on Lookout Mountain, Left on Stanley Hills to Appian Way OR Take Sunset Plaza Drive to Appian Way

REMARKS: Beautiful remodeled laurel canyon home with pristine canyon and mountain views. Fully equipped cook's kitchen with granite tops, stainless steel appliances and all modern amenities. Exquisite master suite with canyon and mountain views, oversized retreat style spa bath, huge closet. 1st floor guest bedroom with en-suite bath. Media Room/Den in addition to large family room. Loft style office. Large covered patio and entertaining deck overlook pool, patio and private garden. Two car garage, gated drive with additional off street parking. Abundant storage and more. [See Community Data](#) [See Walk Score](#)

ROOMS: Breakfast Bar, Den, Den/Office, Dining Area, Entry, Library/Study, Living, Master Bedroom, Patio Covered, Patio Open, Study/Office, Walk-In Closet

AMENIT: Controlled Access, None

EQUIP: Alarm System, Built-Ins, Cable, Dishwasher, Dryer, Garbage Disposal, Hood Fan, Microwave, Range/Oven, Refrigerator, Washer

AIR: Air Conditioning, Central

FLOOR: Hardwood, Mixed

FIREPL: Family Room

HEAT: Central

LAUNDRY: Inside, Room

ROOF: Composition Shingle

TENANT

PAYS: Electric, Gas, Insurance, Pool Service, Water

POOL: In Ground

PARK: Auto Driveway Gate, Controlled Entrance, Covered Parking, Door Opener, Driveway, Driveway Gate, Garage, Garage - 2 Car, Garage Is Detached, Gated, Private Garage, Side By Side

VIEW TYPE: Canyon, Mountains, Pool

SEC: Gated, Owned, Prewired for alarm system, Smoke Detector

SEWER: In Street

TYPE: Single Family, Split Level

WATERFRONT:

POSS:

SZONE: Property Report

SPA: Bath Tub, Hot Tub, In Ground, Private

DISC: As Is

OCC/SHOW: 24-hr Notice, Appointment Only, Call First, Call LA 1, Do Not Contact Occupant, Drive By, Listing Agent Accompanies

LP: \$5,995

DOM: 24

LD: 12/26/2012

SP: \$5,995

SSP:

BLOG Y/N: Yes

LP/SF: \$3.24

OLP: \$5,995

CDOM: 24

CD: 01/20/2013

SD: 01/23/2013

WD:

AVM Y/N: Yes

SP/SF: \$3.00

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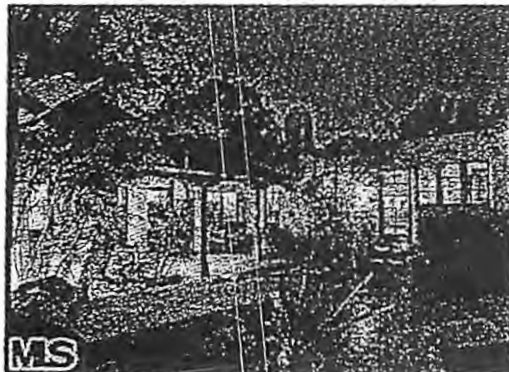


Abe Soleimani
Coldwell Banker, Beverly Hills North
310-777-6260
abesoleimani@aol.com 310-278-7192 Fax

STATUS: Sold

ADDRESS: 1725 MOUNT OLYMPUS DR, LOS ANGELES, CA 90046

SP: \$8,000



CLICK HERE TO VIEW
THE MAP IMAGE!

[Larger Map](#) [Aerial Map](#) [Plat Map](#)

Virtual/Photo Tour Add'l Photos

RESIDENTIAL
LEASE
STYLE: Spanish
APN: 5569-034-003
UNIT LOC: N/A
EXP: N/A
BALC: N/A
HORSE PROP:
ELEM:

AREA: (3) Sunset Strip - Hollywood Hills West
SUB:
SFR/CA: SFR
VIEW: Yes
GH: None
SALE: No
OPT \$:
JRHS:

MAP: 593/B4
PUD:
HOD: \$0.00
POOL: No
#FP:
LOP: No
OPTT:
SRHS:

MLS# 13-653441
YB: 1928
STORIES: 2
#UNITS: 0
FLR#: 0
FUR: Yes
PETS: Call
COMPLEX n/a

BR: 3
BA: 3.00
APX SF: 3,000/OW
APX LSZ: 5,030/VN
PKGT: 2
#CVD PKG: 2
SDEP: \$15,900
TERM: 1+Year, 1-Year, Month-to-Month, Negotiable

DIRECTIONS: Crescent Heights to Mount Olympus Drive, North of Hollywood Blvd

REMARKS: Stunning walled and gated Hollywood Hills residence. Ideally located, close to many of the best restaurants and entertainment of the Sunset Strip, yet in a private setting. Beautifully appointed space with top-of-the-line furnishings and appliances, fit for the Hollywood elite who have enjoyed this home. Amenities include, chef's kitchen with Traulson refrigerator and Viking range, secluded Spa, Olhausen pool table, 5 flat-screen tvs, full bar and three fire places. A unique combination of beauty, luxury, comfort and convenience. Length of term negotiable. [View Community Data](#) [View Walk Score](#)

ROOMS: Dining, Living, Patio Enclosed, Powder, Walk-In Closet, Other**AMENIT:** None**EQUIP:** Alarm System, Ceiling Fan, Dishwasher, Dryer, Garbage Disposal, Microwave, Range/Oven, Refrigerator, Washer**AIR:** Air Conditioning, Central**FLOOR:** Hardwood, Tile, Other**FIREPL:** Exterior, Living Room, Patio, Wood Burning**POOL:** None**PARK:** Private Garage**VIEW TYPE:** Courtyard, Other**SEC:****SEWER:****DISC:** Other**OCC/SHOW:** Call LA 1**HEAT:** Central**LAUNDRY:** Inside**ROOF:****TENANT PAYS:** Electric, Gas, Other**TYPE:** Single Family**WATERFRONT:****POSS:****SZONE:****SPA:**

LP: \$7,950

DOM: 26

LD: 02/20/2013

SP: \$8,000

SSP:

BLOG Y/N: No

LP/SF: \$2.65

OLP: \$7,950

CDOM: 26

CD: 03/18/2013

SD: 03/18/2013

WD:

AVM Y/N: No

SP/SF: \$2.00

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