LEWIS BRISBOIS

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July 2, 2026

Board of Directors
Le St. Tropez Homeowners Association
Laguna Niguel, CA
c/o Managing Agent, Jolene Horn

Re: ***Frances Rosenkranz v. Le St. Tropez Homeowners Association***
Orange County Superior Court Case No. 30-2025-01521968-CU-BC-CJC
Our client: Le St. Tropez Homeowners Association (the "Association")

Dear Ms. Horn:

The purpose of this correspondence is to provide updated information regarding the above-referenced matter.

On October 27, 2025, Plaintiff, Frances Rosenkranz, filed the above-referenced Complaint against the Le St. Tropez Homeowners Association (the "Association") in the Orange County Superior Court, case no. 30-2025-01521968-CU-BC-CJC ("the Action"). The information regarding the Action provided herein is the information known as of the date of this correspondence.

The Action was brought against our client, the Association by one of its members, Plaintiff, Frances Rosenkranz, who resides in a single family home located at 23905 Catamaran Way in Laguna Niguel, California 92677. Plaintiff has had longstanding disputes with several of the other residents in the community, as well as the Association, and the Association's former and present property managers and Board members. In the Action, she alleges that the Association did not repair certain areas in and around her property which she claims the Association had an obligation to repair, causing damages to her attic, roof and garage. Plaintiff further alleges that the Association was obligated to perform work in other common areas including retaining walls, fencing, and water meters.

The Complaint alleges the following causes of action for: 1) Breach of the CC&Rs; 2) Enforcement of Equitable Servitudes; 3) Breach of the Implied Covenant of Good Faith and Fair Dealing; 4) Breach of Fiduciary Duty; 5) Negligence; 6) Nuisance; 7) Trespass,

and; 8) Declaratory Relief. Plaintiff seeks general and special damages, punitive damages and attorneys' fees in connection with her claims and also requests that the Association perform work in and around her unit. The trial date is currently January 4, 2027.

On February 5, 2026, the Association filed an Answer to the Complaint, denying the allegations and asserting appropriate affirmative defenses to the claims.

Lewis Brisbois Bisgaard & Smith was retained by Farmers Insurance Company to defend the Association in the Action. It is understood that Farmers Insurance Company has agreed to defend the Association in the Action and the firm is solely defense counsel for the Association in the Action. By this correspondence, no opinions are offered regarding insurance coverage for the claims in the Action.

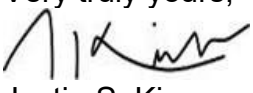
Truck Insurance Exchange (affiliated with Farmers Insurance Company) issued policy no. 60506-75-64 to the Association. It is understood that the policy provides for liability insurance coverage due to bodily injury, property damage and personal injury caused by an occurrence as defined in the policy, with limits of $1,000,000 per occurrence. We do not have any information pertaining to Truck Insurance Exchange's coverage positions in connection with the Action.

In the Action, Plaintiff was represented by attorney Jess Rodriguez of the law firm MBK Chapman. We were working with Plaintiff's attorneys in order to resolve the Action, however, in or around January of this year, Mr. Rodriguez ceased communicating with our office. On April 1, 2026, a substitution of attorney was filed by the attorney Tate Casey of the law firm LS Carlson, who assumed representation of Plaintiff in the Action.

Mr. Casey has communicated his desire to attempt to settle and dismiss the Action. Over the past month, the Association, its property manager, our firm, Mr. Casey and Plaintiff have been collectively conferring with regard to Plaintiff's grievances set forth in her Complaint and other issues involving Plaintiff. The parties are also scheduling a mediation with mediator John Edwards of the West Coast Resolution Group, anticipated to go forward in early September, 2026.

Please do not hesitate to contact the undersigned if you have any questions.

Very truly yours,



Justin S. Kim
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