

TEL: 714.835.9011  
FAX: 714.667.7806  
www.PLSDLAW.com

LAW OFFICES OF  
**PYKA · LENHARDT**  
**SCHNAIDER · DAWKINS**  
A LIMITED LIABILITY PARTNERSHIP

IN REPLY REFER TO:  
1600  
[kdawkins@plsdlaw.com](mailto:kdawkins@plsdlaw.com)  
[dlenhardt@plsdlaw.com](mailto:dlenhardt@plsdlaw.com)

P.O. BOX 1558 • SANTA ANA, CALIFORNIA 92702-1558

May 1, 2019

*Via Email Only - [catherine.laster@vmsinc.org](mailto:catherine.laster@vmsinc.org)*

Catherine Laster, Executive Assistant  
Village Management Services  
P.O. Box 2220  
24351 El Toro Road  
Laguna Woods, CA 92654-2220

Re: **Jane Doe and Dickinson v. Golden Rain Foundation of Laguna Woods, et al.**  
Case No.: 30-2019-01043724  
Orange County Superior Court

To Whom It May Concern:

We are attorneys for Golden Rain Foundation of Laguna Woods in the matter of Jane Doe and Dickinson vs. Golden Rain Foundation of Laguna Woods; Laguna Woods Village, and as such, continually advise our client of developments in this matter. We have received a request for our legal opinion as to this lawsuit and its effect on real property within the Laguna Woods Village community. This case involves an allegation that the plaintiff was sexually harassed during a recreational activity.

This case has been accepted by the insurance company for Golden Rain Foundation of Laguna Woods, and we have been advised as to the insurance coverage applicable to this incident and it appears that the coverage is sufficient for any claimed losses in this litigation. This lawsuit should not affect a homeowner's ability to transfer title. Further, a typical uninvolved homeowner will not be affected by this lawsuit.

Since we report directly to our clients and all of those conversations and our opinions are attorney-client privileged information, we cannot give you a more detailed analysis of this file without revealing attorney-client privileged information. However, it is very unlikely that any individual home's property value would be affected by this lawsuit because there is adequate insurance to address this lawsuit.

Golden Rain Foundation of Laguna Woods maintains insurance for such legal matters, and while the result of these legal matters cannot be predicted with certainty, it is extraordinarily unlikely that the final outcome of such matters will have a material

Catherine Laster, Executive Assistant  
May 1, 2019  
Page - 2 -

adverse effect on any of these entity's financial statements. If the matter is resolved in favor of the plaintiff, the associations have sufficient assets to cover the loss.

*Please do not contact this office regarding this matter as we are unable to discuss this lawsuit with anyone except our client.*

Very truly yours,

**PYKA · LENHARDT · SCHNAIDER · DAWKINS**



**Krista Dawkins**

KD:mf