



**R E M Y | M O O S E | M A N L E Y**  
LLP

Tiffany K. Wright  
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April 7, 2025

**Via Electronic Mail**

Anne Haley  
Managing Assistant City Attorney  
Los Angeles City Attorney's Office  
200 North Main Street  
900 City Hall East  
Los Angeles, CA 90012  
[anne.haley@lacity.org](mailto:anne.haley@lacity.org)

Re: Request for Consent of Continued Representation and Waiver of Potential  
Conflict of Interest

Dear Anne:

As you know, my firm Remy Moose Manley, LLP (RMM) currently represents and advises, and has for many years, the City of Los Angeles (City) as the City's outside counsel with regard to the City's compliance with the California Environmental Quality Act (CEQA) and other land use laws for public and private proposed development projects within the City.

RMM has been contacted by Phillips 66 Los Angeles Refinery (Phillips 66) and its development partners Catellus Development Corporation and DECA Co. to potentially assist them in the environmental peer review process for the redevelopment of the 450-acre Phillips 66 refinery site in Wilmington. The project propose to end refinery activities and redevelop the site with mixed uses. The Wilmington project would require approval from the City.

The purpose of this letter is to inform you and memorialize our discussion regarding the potential conflicts we are asking the City to waive if RMM were retained by Phillips 66 for the project described above. RMM's work on the project would consist of reviewing CEQA documents and advising the Phillips 66 team regarding CEQA compliance only. RMM would not be interacting with City planning or other City staff (unless the City requested us to), as those interactions would be handled by the development team. RMM would set up an ethical wall so that none of our attorneys that work with the City will work on behalf of this potential client.

Additionally, RMM also represents the Port of LA as outside counsel for CEQA. We're not aware of any actual or potential conflict between this project and the Port, but we are

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aware that Phillips 66 is a Port tenant. One project the Port has asked RMM to work on is a MOTEMs improvement/lease extension project for Phillips 66.

RMM will undertake this work on behalf of the Phillips 66 team only if the City consents to such work. If RMM undertakes this work on behalf of Phillips 66 and its development partners Catellus and DECA, the City acknowledges and consents to RMM's ongoing representation of the City and waives any potential conflict of interest associated with that work. RMM will have a continuing duty of loyalty to the City and Phillips 66 and will maintain confidentiality of all attorney/client communications with both clients.

Based on the conditions and limitations outlined herein, RMM respectfully requests that the City consent to RMM's continued representation of the City and waive any potential conflict of interest associated with Phillips 66 retaining RMM for the Wilmington project.

Thank you for your cooperation in this matter, and please don't hesitate to contact me should you need any further information.

Very truly yours,

Tiffany K. Wright