

**DISTRICT OF COLUMBIA
OFFICE OF ADMINISTRATIVE HEARINGS**

<p>HARRY GURAL <i>Tenant/Petitioner,</i></p> <p style="text-align:center">v.</p> <p>EQUITY RESIDENTIAL MANAGEMENT and SMITH PROPERTY HOLDINGS VAN NESS LP <i>Housing Provider/Respondent</i></p>	<p>2016-DHCD-TP 30,855</p> <p><i>In re: 3003 Van Ness St. NW, S-707</i></p> <p>Chief Judge M. Colleen Currie</p>
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TENANT/PETITIONER’S LIST OF WITNESSES AND DOCUMENTS

Pursuant to Order Scheduling In-person Hearing on Remand of June 14, 2023, Tenant/Petitioner (“Tenant”) submits the following list of witnesses it may call and documents (copies of which are attached via Google Docs) it may introduce.

I. Witnesses:

- Avis Duval, Community Manager and General Manager, 3003 Van Ness, Equity Residential, 2015 – 2018¹
- Julia Jackson, Leasing Manager, 3003 Van Ness, Dec. 2016 to present
- Stacey Aguiar, Regional Manager, DC Metro Area, Equity Residential, March 2014 – Feb. 2018
- Frances Nolan, Vice President, DC Metro Area, Equity Residential, Jan. 2016 – March 2023
- Any other witness called by the Housing Provider

Tenant reserves the right to add additional witnesses based on evidence or testimony presented by Housing Provider, and to impeach or rebut witnesses called by Housing Provider.

¹ Housing provider states that Ms. Duvall no longer works for the Housing Provider, and so her participation cannot be guaranteed. Tenant will request the court to file a subpoena of Ms. Duvall, who appears to reside in suburban Washington, D.C.

II. Documents

- EXHIBIT 100. Tenant Petition/Complaint, TP 30,855, Harry Gural vs. Equity Residential (Aug. 30, 2016)
- EXHIBIT 101. Decision and Order, DC Rental Housing Commission, *Harry Gural vs. Equity Residential Management and Smith Property Holdings Van Ness LP*, RH-TP-16-30,855 (Feb. 18, 2020)
- EXHIBIT 102. Decision and Order, District of Columbia Rental Housing Commission, *Gabriel Fineman vs. Smith Property Holdings Van Ness LP*, RH-TP-16-30,842 (Jan. 18, 2018)
- EXHIBIT 103. Final Order, DC Superior Court, *District of Columbia vs. Equity Residential Management*, 2017-CA-008334-B (Oct. 8, 2021)
- EXHIBIT 104. Judgement and Order on Remedies, DC Superior Court, *District of Columbia vs. Equity Residential Management*, 2017-CA-008334-B (Oct. 8, 2021)
- EXHIBIT 105. Order Denying Housing Provider's Motion for Summary Judgment, Judge Colleen Currie, Office of Administrative Hearings, *Harry Gural vs. Equity Residential Management and Smith Property Holdings Van Ness LP*, 2016-DHCD-TP-30,855 (May 2, 2023)
- EXHIBIT 106. Order Denying in Part and Granting in Part Tenant/Petitioner's Motion for Discovery, Judge Colleen Currie, Office of Administrative Hearings, *Harry Gural vs. Equity Residential Management and Smith Property Holdings Van Ness LP*, 2016-DHCD-TP-30,855 (Oct. 17, 2023)
- EXHIBIT 107. Tenant Opposition to Housing Provider's Motion for Summary Judgment, *Harry Gural vs. Equity Residential Management and Smith Property Holdings Van Ness LP*, 2016-DHCD-TP-30,855 (Nov. 4, 2016)
- EXHIBIT 108. Tenant's Motion for Summary Judgment, *Harry Gural vs. Equity Residential Management and Smith Property Holdings Van Ness LP*, 2016-DHCD-TP-30,855 (March 3, 2017)
- EXHIBIT 109. Tenant's Post-Hearing Brief and Closing Arguments (on Retaliation), *Harry Gural vs. Equity Residential Management and Smith Property Holdings Van Ness LP*, 2016-DHCD-TP-30,855 (July 29, 2017)
- EXHIBIT 110. Tenant's Notice of Appeal to the DC Rental Housing Commission, *Harry Gural vs. Equity Residential Management and Smith Property Holdings Van Ness LP*, RH-TP-16-30,855 (Sept. 28, 2017)
- EXHIBIT 111. Brief of Appellant/Tenant to the DC Rental Housing Commission, *Harry Gural vs. Equity Residential Management and Smith Property Holdings Van Ness LP*, RH-TP-16-30,855 (March 4, 2019)

- EXHIBIT 112. Verified Complaint for Possession of Real Property, *Equity Residential v Harry Gural*, Landlord and Tenant Branch of DC Superior Court, case LTB-2016-10863 (Apr. 25, 2016)
- EXHIBIT 113. Protective Order Information Sheet, *Equity Residential v Harry Gural*, Landlord and Tenant Branch of DC Superior Court, case LTB-2016-10863, Judge John Campbell (May 19, 2016)
- EXHIBIT 114. Equity Residential motion to Vacate Drayton stay, *Equity Residential v Harry Gural*, Landlord and Tenant Branch of DC Superior Court, case LTB-2016-10863 (Aug. 23, 2016)
- EXHIBIT 115. Court docket and account – Equity Residential vs. Harry Gural, Landlord and Tenant Branch of DC Superior Court
- EXHIBIT 116. Account statement, \$49,319.92, www.MyEquityApartments.com for Harry Gural (Dec. 14, 2023)
- EXHIBIT 117. Lease for Apt. S-707, Apr. 1, 2014 to March 31, 2015 (March 2, 2014)
- EXHIBIT 118. Unsigned lease for Apt. S-707, Apr. 1, 2015 to March 31, 2016 (Feb. 17, 2015)
- EXHIBIT 119. Affidavit by Harry Gural of actions taken that are protected from retaliation under the Rental Housing Act (May 15, 2017)
- EXHIBIT 120. Affidavit by Avis Duvall (Oct. 21, 2016)
- EXHIBIT 121. Wells Fargo checking account statement, Harry Gural (Jan. 28, 2015)
- EXHIBIT 122. Wells Fargo checking account statement, Harry Gural (Feb. 26, 2015)
- EXHIBIT 123. Wells Fargo checking account statement, Harry Gural (Jan. 28, 2016)
- EXHIBIT 124. Wells Fargo checking account statement, Harry Gural (Feb. 25, 2016)
- EXHIBIT 125. Certificate of Notice to RAD of Adjustments in Rent Charged, Smith Property Holdings Van Ness LP, 3003 Van Ness (Jan. 15, 2015)
- EXHIBIT 126. Certificate of Notice to RAD of Adjustments in Rent Charged, Smith Property Holdings Van Ness LP, 3003 Van Ness (Jan. 15, 2016)
- EXHIBIT 127. Housing Provider’s Notice to Tenant of Adjustment in Rent Charged, Equity Residential to Harry Gural (Jan. 1, 2015)
- EXHIBIT 128. Housing Provider’s Notice to Tenant of Adjustment in Rent Charged, Equity Residential to Harry Gural (Jan. 1, 2016)
- EXHIBIT 129. Housing Provider’s Notice to Tenant of Adjustment in Rent Charged, falsified rents, 20 residents of 3003 (names redacted)

- EXHIBIT 130. Pricing for apartments at 3003 Van Ness, downloaded from Equity Residential website <https://www.equityapartments.com/washington-dc/van-ness/3003-van-ness-apartments> (May 19, 2016)
- EXHIBIT 131. Apartment directly across the hall from the Tenant's apartment, identical layout, refurbished
- EXHIBIT 132. Email from Harry Gural to Equity Residential Leasing Agent Merci Kearney (March 17, 2014)
- EXHIBIT 133. Email from Equity Residential Leasing Agent Merci Kearney to Harry Gural (March 17, 2014)
- EXHIBIT 134. Email from Harry Gural to Equity Residential Leasing Agent Merci Kearney (March 17, 2014)
- EXHIBIT 135. Email from Equity Residential Leasing Agent Merci Kearney to Harry Gural (March 18, 2014)
- EXHIBIT 136. Email from Harry Gural to Equity Residential General Manager Avis Duvall, Regional Manager Jesse Jennell and Leasing Agent Merci Kearney regarding the 2015 rent increase on his apartment. (Jan. 1, 2015)
- EXHIBIT 137. First email from Equity Residential Leasing Agent Merci Kearney to Harry Gural, copied to Avis Duvall and Jesse Jennell (Feb. 9, 2015)
- EXHIBIT 138. Second email from Equity Residential Leasing Agent Merci Kearney to Harry Gural, copied to Avis Duvall and Jesse Jennell (Feb. 9, 2015)
- EXHIBIT 139. Email from Harry Gural to Equity Residential General Manager Avis Duvall regarding the 2016 rent increase on his apartment (March 15, 2016)
- EXHIBIT 140. Email from Harry Gural to Equity Residential General Manager Avis Duvall regarding the 2016 rent increase on his apartment (March 30, 2016)
- EXHIBIT 141. Email from Equity Residential General Manager Avis Duvall to Harry Gural regarding the 2016 rent increase on his apartment (Apr. 1, 2016)
- EXHIBIT 142. Another email from Equity Residential General Manager Avis Duvall to Harry Gural regarding the 2016 rent increase on his apartment (Apr. 1, 2016)
- EXHIBIT 143. Email from Harry Gural to Equity Residential General Manager Avis Duvall stating that Equity cannot force him to sign a lease (Apr. 1, 2016)
- EXHIBIT 144. First email from Equity Residential General Manager Avis Duvall to Harry Gural regarding his last lease (May 3, 2016)
- EXHIBIT 145. Second email from Equity Residential General Manager Avis Duvall to Harry Gural regarding his last lease (May 3, 2016)

- EXHIBIT 146. Email from Equity Residential General Manager Avis Duvall to Harry Gural attaching his lease for the period covering April 2014 to March 2015 (May 6, 2016)
- EXHIBIT 147. Email from Equity Residential General Manager Avis Duvall to Harry Gural regarding 2016 rent increase on his apartment (May 13, 2016)
- EXHIBIT 148. Email from David Wilson, resident of 3003 Van Ness, expressing support for Harry Gural's work as tenant association president (May 22, 2017)
- EXHIBIT 149. Email from Calvin Lee, resident of 3003 Van Ness, expressing support for Harry Gural's work as tenant association president (May 17, 2017)
- EXHIBIT 150. Email from Arai Monteforte, resident of 3003 Van Ness, expressing support for Harry Gural's work as tenant association president (May 15, 2017)
- EXHIBIT 151. Email from Daisy Chung, resident of 3003 Van Ness, expressing support for Harry Gural's work as tenant association president (May 15, 2017)
- EXHIBIT 152. Email from Mary Jane Maxwell, resident of 3003 Van Ness, expressing support for Harry Gural's work as tenant association president (May 16, 2017)
- EXHIBIT 153. Email from Katie and Nick Pettet, resident of 3003 Van Ness, expressing support for Harry Gural's work as tenant association president (May 23, 2017)
- EXHIBIT 154. Email from Dee Fosherari, resident of 3003 Van Ness, expressing support for Harry Gural's work as tenant association president (May 23, 2017)
- EXHIBIT 155. Email from Sarah Pleznac, resident of 3003 Van Ness, expressing support for Harry Gural's work as tenant association president (May 17, 2017)
- EXHIBIT 156. Email from Shirley Adelstein, resident of 3003 Van Ness, expressing support for Harry Gural's work as tenant association president (May 16, 2017)
- EXHIBIT 157. Email from Ben Serinsky, resident of 3003 Van Ness, expressing support for Harry Gural's work as tenant association president (May 17, 2017)
- EXHIBIT 158. Email from Amelia Finch, resident of 3003 Van Ness, expressing support for Harry Gural's work as tenant association president (May 17, 2017)
- EXHIBIT 159. Email from Equity Residential Regional Manager Jesse Jennell to Harry Gural regarding rent increase for Charlie and Amelia Finch (May 12, 2015)
- EXHIBIT 160. Email from Equity Residential Regional Manager Jesse Jennell to Harry Gural regarding rent increase for Chary Annaberdiev (Oct. 1, 2015)
- EXHIBIT 161. Email from Equity Residential General Manager Avis Duvall to Harry Gural regarding rent increase for Pat Remick (Oct. 1, 2015)
- EXHIBIT 162. Email from Equity Residential General Manager Avis Duvall to Harry Gural regarding rent increase to Chary Annaberdiev (Oct. 2, 2015)

- EXHIBIT 163. Email from Equity Residential Regional Manager Jesse Jennell to Charlie Finch and copied to Harry Gural regarding rent for Charlie and Amelia Finch (May 13, 2016)
- EXHIBIT 164. Email from Equity Residential Regional Manager Jesse Jennell to Harry Gural regarding rent increase for Charlie and Amelia Finch (May 13, 2016)
- EXHIBIT 165. Email from Equity Residential Regional Manager Jesse Jennell to Harry Gural regarding rent increase for Justin and Emma Pennisi (May 13, 2016)
- EXHIBIT 166. Tenant Request to Housing Provider for Production of Documents, *Harry Gural vs. Equity Residential Management and Smith Property Holdings Van Ness LP*, 2016-DHCD-TP-30,855 (Dec. 4, 2023)
- EXHIBIT 167. The final exhibit will be added when it is delivered by the Housing Provider in response to the Tenant Request to Housing Provider for Production of Documents (Dec. 4, 2023). Attorney for the Housing Provider states that the documents will be delivered on or prior to Jan. 4, 2023.

Respectfully submitted,



HARRY GURAL
Tenant/Petitioner *pro se*

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Dated: December 15, 2023

CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing Tenant's Request to Housing Provider for Production of Documents was served on this 15th day of December, 2023, by email upon:

Richard W. Luchs (D.C. Bar No. 243931)
Spencer B. Ritchie (D.C. Bar No. 167352)
Greenstein, DeLorme and Luchs
801 17th Street, N.W., Suite 1000
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Dec. 15, 2023

Harry Gural
Tenant/Petitioner, *pro se*

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