

1 R. SAMUEL PAZ, ESQ. (Bar No. 62373)  
2 LAW OFFICES OF R. SAMUEL PAZ  
3 505 Mission Street  
4 South Pasadena CA. 91030 (213) 254-7300

5 Sonia M. Mercado, Esq. (Bar No. 117069)  
6 SONIA MERCADO & ASSOCIATES  
7 Citicorp Plaza - 37th Floor, 777 South Figueroa Street  
8 Los Angeles, California 90017-5810 (213) 955-4271

9 Attorneys for Plaintiff FELICITAS CASTANEDA

**FILED**  
LOS ANGELES SUPERIOR COURT

JAN 17 1997

JOHN A. CLARKE, CLERK

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF LOS ANGELES BY Y. SMITH, DEPUTY

11 FELICITAS CASTANEDA, )  
12 Plaintiff, )  
13 vs. )  
14 COUNTY OF LOS ANGELES, et al., )  
15 Defendants. )

CASE NO. BC 128253  
NOTICE OF MOTION AND MOTION  
FOR AN ORDER COMPELLING  
ANSWERS TO PLAINTIFF'S DEMAND  
TO PRODUCE DOCUMENTS FOR  
INSPECTION AND COPY  
PROPOUNDED TO DEFENDANT  
EUGENE KUNZMAN (SET NO. 1); AND  
FOR AN ASSESSMENT OF  
REASONABLE ATTORNEY'S FEES AND  
COSTS AGAINST DEFENDANT  
EUGENE KUNZMAN AND/OR ITS  
COUNSEL, MANNING MARDER &  
WOLFE; DECLARATION OF R.  
SAMUEL PAZ

Date: 02/03/97  
Time: 8:30 a.m.  
Dept: "56"

Disc. Cut-off: 02/17/97  
Motion Cut-off: 03/03/97  
Trial Date: 03/17/97

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

Plaintiff, Felicitas Castaneda, (hereinafter "Plaintiff") hereby gives notice that on February 3, 1997, at 8:30 a.m. in Department 56, located at 111 N. Hill Street Los Angeles, California 90012, plaintiff will move the court for an order compelling answers to PLAINTIFF'S DEMAND TO PRODUCE DOCUMENTS FOR INSPECTION AND COPY PROPOUNDED TO DEFENDANT EUGENE KUNZMAN (SET NO. 1), and for an order

FILED  
JAN 17 1997  
CENTRAL FILING ROOM  
14.00

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9 Attorneys for Plaintiff FELICITAS CASTANEDA

**FILED**  
LOS ANGELES SUPERIOR COURT

JAN 17 1997

JOHN A. CLARKE, CLERK

BY Y. SMITH, DEPUTY

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**

**IN AND FOR THE COUNTY OF LOS ANGELES**

11 FELICITAS CASTANEDA,

12 Plaintiff,

13 vs.

14 COUNTY OF LOS ANGELES, et al.,

15 Defendants.

CASE NO. BC 128253

NOTICE OF MOTION AND MOTION  
FOR AN ORDER COMPELLING  
ANSWERS TO PLAINTIFF'S DEMAND  
TO PRODUCE DOCUMENTS FOR  
INSPECTION AND COPY  
PROPOUNDED TO DEFENDANT  
COUNTY OF LOS ANGELES  
(SET NO. 3); AND FOR AN  
ASSESSMENT OF REASONABLE  
ATTORNEY'S FEES AND COSTS  
AGAINST DEFENDANT COUNTY OF  
LOS ANGELES AND/OR ITS COUNSEL,  
MANNING MARDER & WOLFE;  
DECLARATION OF R. SAMUEL PAZ

Date:02/03/97  
Time:8:30 a.m.  
Dept:"56"

Disc. Cut-off:02/17/97  
Motion Cut-off:03/03/97  
Trial Date:03/17/97

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23 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

24 Plaintiff, Felicitas Castaneda, (hereinafter "Plaintiff") hereby gives notice that on  
25 February 3, 1997, at 8:30 a.m. in Department 56, located at 111 N. Hill Street, Los Angeles,  
26 California 90012, plaintiff will move the court for an order compelling answers to  
27 PLAINTIFF'S DEMAND TO PRODUCE DOCUMENTS FOR INSPECTION AND COPY  
28 PROPOUNDED TO DEFENDANT COUNTY OF LOS ANGELES (SET NO. 3), and for an

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6 SONIA MERCADO & ASSOCIATES  
7 Citicorp Plaza - 37th Floor, 777 South Figueroa Street  
8 Los Angeles, California 90017-5810 (213) 955-4271

9 Attorneys for Plaintiff FELICITAS CASTANEDA

**FILED**  
LOS ANGELES SUPERIOR COURT

JAN 17 1997

JOHN A. CLARKE, CLERK

*[Signature]*  
BY X SMITH, DEPUTY

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
IN AND FOR THE COUNTY OF LOS ANGELES

11 FELICITAS CASTANEDA, )  
12 Plaintiff, )  
13 vs. )  
14 COUNTY OF LOS ANGELES, et al., )  
15 Defendants. )  
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17 )  
18 )

CASE NO. BC 128253  
NOTICE OF MOTION AND MOTION  
FOR AN ORDER COMPELLING  
ANSWERS TO PLAINTIFF'S SPECIAL  
INTERROGATORIES TO DEFENDANT  
EUGENE KUNZMAN (SET NO. 1); AND  
FOR AN ASSESSMENT OF  
REASONABLE ATTORNEY'S FEES AND  
COSTS AGAINST DEFENDANT JOHN  
CLARK AND/OR HIS COUNSEL,  
MANNING MARDER & WOLFE;  
DECLARATION OF R. SAMUEL PAZ

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22 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

23 Plaintiff, Felicitas Castaneda, (hereinafter "Plaintiff") hereby gives notice that on  
24 February 3, 1997, at 8:30 a.m. in Department 56, located at 111 N. Hill Street, Los Angeles,  
25 California 90012, plaintiff will move the court for an order compelling answers to  
26 PLAINTIFF'S SPECIAL INTERROGATORIES TO DEFENDANT EUGENE KUNZMAN  
27 (SET NO. 1), and for an order assessing defendant EUGENE KUNZMAN and/or its counsel  
28 Manning Marder & Wolfe the reasonable attorney's fees and costs in the amount of \$750

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8 Los Angeles, California 90017-5810 (213) 955-4271

9 Attorneys for Plaintiff FELICITAS CASTANEDA

**FILED**  
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12 FELICITAS CASTANEDA, )  
13 Plaintiff, )  
14 vs. )  
15 COUNTY OF LOS ANGELES, et al., )  
16 Defendants. )

CASE NO. BC 128253  
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FOR AN ORDER COMPELLING  
ANSWERS TO PLAINTIFF'S SPECIAL  
INTERROGATORIES TO DEFENDANT  
JOHN CLARK (SET NO. 1); AND FOR  
AN ASSESSMENT OF REASONABLE  
ATTORNEY'S FEES AND COSTS  
AGAINST DEFENDANT JOHN CLARK  
AND/OR HIS COUNSEL, MANNING  
MARDER & WOLFE; DECLARATION  
OF R. SAMUEL PAZ

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23 Plaintiff, Felicitas Castaneda, (hereinafter "Plaintiff") hereby gives notice that on  
24 February 3, 1997, at 8:30 a.m. in Department 56, located at 111 N. Hill Street, Los Angeles,  
25 California 90012, plaintiff will move the court for an order compelling answers to  
26 PLAINTIFF'S SPECIAL INTERROGATORIES TO DEFENDANT JOHN CLARK (SET  
27 NO. 1), and for an order assessing defendant County of Los Angeles and/or its counsel  
28 Manning Marder & Wolfe the reasonable attorney's fees and costs in the amount of \$750

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8 Los Angeles, California 90017-5810 (213) 955-4271

9 Attorneys for Plaintiff FELICITAS CASTANEDA

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JAN 17 1997

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BY Y. SMITH, DEPUTY

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

11 **IN AND FOR THE COUNTY OF LOS ANGELES**

12 FELICITAS CASTANEDA, )

13 Plaintiff, )

14 vs. )

15 COUNTY OF LOS ANGELES, et al., )

16 Defendants. )

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INTERROGATORIES TO DEFENDANT  
COUNTY OF LOS ANGELES  
(SET NO. 1); AND FOR AN  
ASSESSMENT OF REASONABLE  
ATTORNEY'S FEES AND COSTS  
AGAINST DEFENDANT COUNTY OF  
LOS ANGELES AND/OR ITS COUNSEL,  
MANNING MARDER & WOLFE;  
DECLARATION OF R. SAMUEL PAZ

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25 California 90012, plaintiff will move the court for an order compelling answers to  
26 PLAINTIFF'S SPECIAL INTERROGATORIES TO DEFENDANT COUNTY OF LOS  
27 ANGELES (SET NO. 1), and for an order assessing defendant County of Los Angeles and/or  
28 its counsel Manning Marder & Wolfe the reasonable attorney's fees and costs in the amount

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**LOS ANGELES SUPERIOR COURT**

5 Sonia M. Mercado, Esq. (Bar No. 117069)  
6 **SONIA MERCADO & ASSOCIATES**  
7 Citicorp Plaza - 37th Floor, 777 South Figueroa Street  
8 Los Angeles, California 90017-5810 (213) 955-4279

JAN 17 1997

JOHN A. CLARKE, CLERK

9 Attorneys for Plaintiff FELICITAS CASTANEDA

*[Signature]*  
BY Y. SMITH, DEPUTY

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11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
12 **IN AND FOR THE COUNTY OF LOS ANGELES**

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) **TO PRODUCE DOCUMENTS FOR**  
) **INSPECTION AND COPY**  
) **PROPOUNDED TO DEFENDANT JOHN**  
) **CLARK (SET NO. 1); AND FOR AN**  
) **ASSESSMENT OF REASONABLE**  
) **ATTORNEY'S FEES AND COSTS**  
) **AGAINST DEFENDANT JOHN CLARK**  
) **AND/OR ITS COUNSEL, MANNING**  
) **MARDER & WOLFE; DECLARATION**  
) **OF R. SAMUEL PAZ**

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27 February 3, 1997, at 8:30 a.m. in Department 56, located at 111 N. Hill Street, Los Angeles,  
28 California 90012, plaintiff will move the court for an order compelling answers to  
PLAINTIFF'S DEMAND TO PRODUCE DOCUMENTS FOR INSPECTION AND COPY  
PROPOUNDED TO DEFENDANT JOHN CLARK (SET NO. 1), and for an order assessing  
defendant John Clark and/or his counsel Manning Marder & Wolfe the reasonable attorney's