

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

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

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 COUNTY OF LOS ANGELES (SET NO. 3), and for an

LAW OFFICES
SONIA MERCADO &
ASSOCIATES

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9 Attorneys for Plaintiff FELICITAS CASTANEDA

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11 FELICITAS CASTANEDA,

12 Plaintiff,

13 vs.

14 COUNTY OF LOS ANGELES, et al.,

15 Defendants.

CASE NO. BC 128253

16 NOTICE OF MOTION AND MOTION
17 FOR AN ORDER COMPELLING
18 ANSWERS TO PLAINTIFF'S SPECIAL
19 INTERROGATORIES TO DEFENDANT
20 JOHN CLARK (SET NO. 1); AND FOR
21 AN ASSESSMENT OF REASONABLE
22 ATTORNEY'S FEES AND COSTS
23 AGAINST DEFENDANT JOHN CLARK
24 AND/OR HIS COUNSEL, MANNING
25 MARDER & WOLFE; DECLARATION
26 OF R. SAMUEL PAZ

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

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

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 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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9 Attorneys for Plaintiff FELICITAS CASTANEDA

FILED
LOS ANGELES SUPERIOR COURT

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.

CASE NO. BC 128253

NOTICE OF MOTION AND MOTION
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ANSWERS TO PLAINTIFF'S SPECIAL
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

Date:02/03/97

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

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

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FILED
LOS ANGELES SUPERIOR COURT

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JAN 17 1997

JOHN A. CLARKE, CLERK

9 Attorneys for Plaintiff FELICITAS CASTANEDA

BY Y. SMITH, DEPUTY

10
11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **IN AND FOR THE COUNTY OF LOS ANGELES**

13 FELICITAS CASTANEDA,
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) CLARK (SET NO. 1); AND FOR AN
) ASSESSMENT OF REASONABLE
) ATTORNEY'S FEES AND COSTS
) AGAINST DEFENDANT JOHN CLARK
) AND/OR ITS COUNSEL, MANNING
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25 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD HEREIN:

26 Plaintiff, Felicitas Castaneda, (hereinafter "Plaintiff") hereby gives notice that on
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