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4 **FISHER & PHILLIPS LLP**  
4747 Executive Drive, Suite 1000  
5 San Diego, California 92121  
Telephone: (858) 597-9600  
6 Facsimile: (858) 597-9601

7 Attorneys for Defendant,  
Nathan Fletcher  
8

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego  
**08/10/2023** at 09:03:00 PM  
Clerk of the Superior Court  
By Bernabe Montijo, Deputy Clerk

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF SAN DIEGO - HALL OF JUSTICE COURTHOUSE**

11 GRECIA FIGUEROA,  
12 Plaintiff(s),

13 v.

14 NATHAN FLETCHER, an individual; SAN  
DIEGO METROPOLITAN TRANSIT  
15 SYSTEM, a California public agency; and,  
DOES 1-20, Inclusive,

16 Defendant(s).  
17

CASE NO.: 37-2023-00012828-CU-OE-CTL  
[Unlimited Jurisdiction]

*Assigned for all purposes to the Honorable  
Matthew C. Braner, Dept. C-60*

**DECLARATION OF DANIELLE  
HULTENIUS MOORE IN SUPPORT OF  
DEFENDANT NATHAN FLETCHER'S  
MOTION TO COMPEL PLAINTIFF'S  
RESPONSE TO REQUEST FOR  
PRODUCTION OF DOCUMENTS,  
SET ONE**

DATE: October 27, 2023  
TIME: 9:00 a.m.

Complaint Filed: March 28, 2023  
Trial Date: Not Set



1 11. A true and correct copy of my firm's July 25, 2023 meet and confer letter to  
2 Plaintiff's counsel is attached hereto as **Exhibit F**.

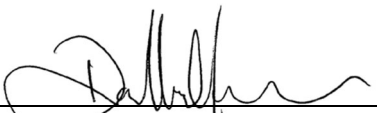
3 12. Plaintiff's counsel did not respond to my firm's July 25, 2023 letter and has still  
4 not produced any responsive documents.

5 13. A true and correct copy of Plaintiff's objections to Defendant Fletcher's subpoena  
6 to Meta Platforms, Inc. is attached hereto as **Exhibit G**.

7 14. As a result of having to file this Motion, Defendant Fletcher incurred and will  
8 incur reasonable attorneys' fees and costs. These fees are for work performed by myself and my  
9 colleagues Stephanie Reynolds and Sean McKaveney. My billing rate for this case is  
10 **\$725.00/hour**. I spent one hour preparing the moving papers and anticipate spending one hour  
11 preparing the reply papers. I also anticipate spending two hours preparing for and attending the  
12 hearing. Ms. Reynolds spent approximately one hour preparing the moving papers and  
13 anticipates spending one hour preparing the reply papers. Her billing rate is **\$590.00/hour**. Mr.  
14 McKaveney's hourly rate is **\$415.00** and he spent ten hours preparing the moving papers and  
15 supporting documents. He also anticipates spending six hours preparing the reply papers. Overall,  
16 my firm anticipates spending over 22 hours preparing both the motion, supporting papers, reply  
17 papers, and attending the hearing.

18 15. In light of the above, Defendant Fletcher requests sanctions in the amount of  
19 **\$10,720.00** against Plaintiff and her counsel.

20 I declare under penalty of perjury, under the laws of the State of California, that the  
21 foregoing is true and correct. Executed on August 10, 2023, at San Diego, California.

22  
23   
24 \_\_\_\_\_  
Danielle Hultenius Moore

**EXHIBIT “A”**

1 Danielle Hultenius Moore (SBN 232480)  
E-Mail: [dmoore@fisherphillips.com](mailto:dmoore@fisherphillips.com)  
2 Stephanie Reynolds (SBN 220090)  
E-Mail: [sreynolds@fisherphillips.com](mailto:sreynolds@fisherphillips.com)  
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5 **FISHER & PHILLIPS LLP**  
4747 Executive Drive, Suite 1000  
6 San Diego, California 92121  
Telephone: (858)597-9600  
7 Facsimile: (858)597-9601

8 Attorneys for Defendant Nathan Fletcher

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF SAN DIEGO - HALL OF JUSTICE COURTHOUSE**

11 GRECIA FIGUEROA,  
12 Plaintiff,

13 v.

14 NATHAN FLETCHER, an individual;  
SAN DIEGO METROPOLITAN  
15 TRANSIT SYSTEM, a California public  
agency; and , DOES 1-20, Inclusive, ,  
16 Defendants.

CASE NO.: 37-2023-00012828-CU-OE-CTL  
*[Unlimited Jurisdiction]*

*Assigned for all purposes to the Honorable  
Katherine Bacal, Department C-69*

**DEFENDANT NATHAN FLETCHER'S  
REQUEST FOR PRODUCTION OF  
DOCUMENTS TO PLAINTIFF [SET ONE]**

Complaint Filed: March 28, 2023  
Trial Date: Not Set

18 PROPOUNDING PARTY: Defendant Nathan Fletcher

19 RESPONDING PARTY: Plaintiff Grecia Figueroa

20 SET NUMBER: One (1)

21 Pursuant to California Code of Civil Procedure section 2031.010 et. seq., Defendant  
22 Nathan Fletcher (“Defendant”) demands that Plaintiff Grecia Figueroa (“Plaintiff”), produce all  
23 documents and tangible things described below for copying in accordance with the definitions  
24 and instructions set forth below to the law offices of Fisher & Phillips LLP, located at  
25 4747 Executive Drive, Suite 1000, San Diego, California, 92121.

26 **I. DEFINITIONS**

27 For the purpose of this request, the following definitions shall apply:

28 ///

1           1.       The terms “PLAINTIFF,” “YOU,” and “YOURS,” as used herein, refer to  
2 PLAINTIFF Grecia Figueroa, and her attorney, or any person acting as her agent or otherwise  
3 on her behalf.

4           2.       The term “DEFENDANT” as used herein refers to named DEFENDANT Nathan  
5 Fletcher or to any PERSON acting as an agent or otherwise on behalf of DEFENDANT.

6           3.       The term “PERSON,” as used herein, includes a natural person, firm, association,  
7 organization, partnership, business, trust, corporation, company, or public entity.

8           4.       The term “COMPLAINT” as used herein refers to the Complaint filed by  
9 PLAINTIFF in this action on March 28, 2023, and styled *Figueroa v. Fletcher, et al.* (San Diego  
10 County Superior Court; Case No. 37-2023-00012828-CU-OE-CTL).

11           5.       The terms “DOCUMENT” and/or “DOCUMENTS,” as used herein, include  
12 writings, tape recordings, transcriptions, notes, computer disks, electronic data files, information  
13 stored on computer or on any type of computer readable storage media and capable of being  
14 reproduced by printed representation, or any other form of physical evidence. Specifically, the  
15 terms “DOCUMENT” and/or “DOCUMENTS,” as used herein, include any matter or tangible  
16 thing containing or recording any electronic data, handwriting, typewriting, printing,  
17 photographing, or any other means of recording on any tangible thing, any form of  
18 communication, INCLUDING letters, words, pictures, sounds, or symbols, or combinations  
19 thereof, and it further includes any oral communication later reduced to writing or confirmed by  
20 writing. By way of example only, the terms “DOCUMENT” and/or “DOCUMENTS,” as used  
21 herein, include, but are not limited to, any letter, correspondence, note, book, pamphlet, article,  
22 bulletin, directive, review, report, publication, memorandum, diary, log, test, analysis, study,  
23 projection, check, invoice, receipt, bill, audit report, contract, agreement, work paper, calendar,  
24 envelope, paper, telephone message, post-it notes, tapes, drawings, charts, accounts, graphs,  
25 ledgers, statements, reports, financial data, oral communications reduced to writing or confirmed  
26 by writing, meeting agendas, meeting notes, and all other writings or communications,  
27 INCLUDING all non-identical copies, drafts, preliminary sketches, no matter how produced or  
28 maintained in YOUR actual or constructive possession, custody, or control or of which YOU

1 have knowledge or the existence of, and whether prepared, published, or release by YOU or by  
2 any other PERSON. **The terms “DOCUMENT” and/or “DOCUMENTS,” as used herein,**  
3 **shall also include all ESI. All ESI should be produced in its useful form or translated into**  
4 **a usable form for production.** Without limitation on the foregoing, the terms “DOCUMENT”  
5 and/or “DOCUMENTS” shall also include any copy that differs in any respect from the original  
6 or any other versions of the DOCUMENT, such as, but not limited to, copies containing  
7 notations, insertions, corrections, redlining, marginal notes, recommendations, drafts, or any  
8 other variations.

9         6. The term “COMMUNICATIONS,” as used herein means, and includes, any  
10 contact or act by which any information or knowledge is transmitted or conveyed between  
11 two (2) or more PERSONS INCLUDING written contact (by such means as letters, memoranda,  
12 telegrams, electronic mail, telexes, facsimiles, tape recordings, voice recordings, computer  
13 transmissions, computer readable recordings, e-mail, text message, instant messenger, online  
14 chat, or any other DOCUMENTS or ESI), oral contact (by such means as face-to-face  
15 communications or telephone conversations), or any other transfer of information, written or  
16 otherwise.

17         7. The term “ESI” as used herein refers to each and every form of matter, of any  
18 kind, type, nature, or description, that is or has been in YOUR possession, custody, or control,  
19 INCLUDING DOCUMENTS, electronic mail, voicemail, word processing documents,  
20 spreadsheets, databases, images, and sound recordings, which is generated, recorded, preserved  
21 or maintained by electronic means or in electronic form, INCLUDING information generated,  
22 recorded, preserved or maintained on computer hard drives, floppy disks, e-mail, computer files,  
23 deleted computer files, mirror image files, file menus, file directories, file distribution lists,  
24 acknowledgment of receipt files, backup computer files, magnetic tapes, computer archives,  
25 computer memory, computer disk, computer card, film, microfilm, microfiche, microforms,  
26 photographs, or any other form of computer readable storage media, and also INCLUDING drafts  
27 or copies of any of the foregoing that contain any notes, comments, metadata, or markings of any  
28 kind not found on the original ESI or that are otherwise not identical to the original ESI.

1           8.       The terms “RELATE TO” or “RELATING TO” should be understood to apply to  
2 the content of the DOCUMENT if that DOCUMENT consists of, embodies, comprises, concerns,  
3 constitutes, evidences, memorializes, reflects, refers to, pertains to, alludes to, responds to,  
4 describes, analyzes, constructs, discusses, mentions, comments on, demonstrates, substantiates,  
5 shows, supports, proves or disproves, or in any other way deals with, or is logically or factually  
6 connected with or is about or regarding, the subject matter of the request in which the term  
7 “RELATES TO” or “RELATING TO” appears.

8           9.       “And” and “or” shall be construed either conjunctively or disjunctively as  
9 necessary to bring within the scope of the discovery request all responses that might otherwise  
10 be construed to be outside of its scope.

11          10.       “Any,” “all,” “every,” and “each” shall be construed as inclusive or exclusive, as  
12 necessary to afford the broadest and most comprehensive possible scope to the Request  
13 containing such terms.

14          11.       The term “INCLUDING” as used herein means “including without limitation” or  
15 “including, but not limited to.”

## 16 **II.     GENERAL INSTRUCTIONS**

### 17 **A.     Documents Requested**

18          1.       The Requests set out herein call for all DOCUMENTS (INCLUDING ESI) in  
19 PLAINTIFF’s actual or constructive possession, custody, control, or care, INCLUDING those  
20 DOCUMENTS in the actual or constructive possession, custody, control, or care of any lawyer,  
21 agent or other representative of PLAINTIFF.

22          2.       YOU are further requested to identify any DOCUMENT called for by these  
23 requests if YOU know it to be in the possession of DEFENDANT or its attorneys.

24          3.       If YOU subsequently become aware of any DOCUMENT called for by the  
25 requests set out herein, YOU are requested to provide a copy of that DOCUMENT to  
26 DEFENDANT or to identify it, if YOU know it to be in the possession of DEFENDANT or its  
27 attorneys. These Requests are continuing in nature. Any DOCUMENT or item of ESI, created  
28 or identified after service of any response to these Requests for Production, which would have



1 been included in the response had the DOCUMENT then existed or been identified shall  
2 promptly be supplied by supplemental responses whenever YOU find, locate, acquire, create, or  
3 become aware of such DOCUMENTS, up until the time of trial. Supplemental responses are to  
4 be served as soon as reasonably possible, but in no event later than five (5) calendar days after  
5 receipt or discovery of such DOCUMENTS.

6 **B. Documents Destroyed**

7 If any DOCUMENT or item of ESI responsive to these Requests for Production has been  
8 destroyed, discarded, or lost, or was but no longer is in YOUR possession, or is otherwise not  
9 capable of being produced, identify each such DOCUMENT and set forth the following  
10 information: (a) the date of the DOCUMENT; (b) a description of the subject matter of the  
11 DOCUMENT; (c) the name and address of each PERSON who prepared, received, viewed, or  
12 had possession, custody, or control of the DOCUMENT; (d) the date when the DOCUMENT  
13 was destroyed, discarded, or lost; (e) the identity of the PERSON who directed that the  
14 DOCUMENT be destroyed, who directed that the DOCUMENT be discarded, or who lost or  
15 otherwise removed the DOCUMENT from YOUR possession; (f) a statement of the reasons for  
16 and circumstances under which the DOCUMENT was destroyed, discarded, lost, or removed;  
17 and (g) any PERSON from which a copy of that DOCUMENT may be obtained.

18 **C. Documents Withheld**

19 If any DOCUMENT or item of ESI is withheld under a claim of privilege or other  
20 protection, so as to aid the Court and the parties hereto to determine the validity of the claim of  
21 privilege or other protection, provide the following information with respect to any such  
22 DOCUMENT:

23 (a) The identity of the PERSON(S) who prepared the DOCUMENT, who signed it,  
24 and over whose name it was sent out or issued;

25 (b) The identity of the PERSON(S) to whom the DOCUMENT was directed;

26 (c) The nature and substance of the DOCUMENT with sufficient particularity to  
27 enable the Court and Parties hereto to identify the DOCUMENT;

28 (d) The date of the DOCUMENT;

1 (e) The identity of the PERSON who has custody of, or control over, the  
2 DOCUMENT and each copy thereof;

3 (f) The identity of each PERSON to whom copies of the DOCUMENT were  
4 furnished;

5 (g) The number of pages of the DOCUMENT;

6 (h) The basis on which any privilege or other protection is claimed; and

7 (i) Whether any non-privileged matter is included in the DOCUMENT.

8 **D. Partial Production**

9 Each DOCUMENT and item of ESI shall be produced in its entirety and without deletion  
10 or excision, regardless of whether YOU consider the entire DOCUMENT or item of ESI to be  
11 relevant or responsive to any Request for Production. If YOU redact any portion of a  
12 DOCUMENT or item of ESI for any reason, stamp the word "REDACTED" on each page of the  
13 document or portion of the item that has been redacted. If YOU object to a particular request, or  
14 portion thereof, YOU must produce all DOCUMENTS called for which are not subject to that  
15 objection. Similarly, whenever a DOCUMENT is not produced in full for some other reason,  
16 state with particularity the reason(s) it is not being produced in full, and describe, to the best of  
17 YOUR knowledge, information and belief, and with as much particularity as possible those  
18 portions of the DOCUMENT which are not produced.

19 **E. Orderly Response**

20 Please produce the DOCUMENTS called for herein either as they are kept in the usual  
21 course of YOUR affairs, or organize them in such a manner as will facilitate their identification  
22 with a particular request(s) to which they are responsive.

23 **F. Form of Production**

24 1. To the extent material called for by these Requests for Production consists of ESI,  
25 and such Request for Production does not call for production in native format, such material shall  
26 be produced in an electronically searchable format (such as text searchable PDF) that includes  
27 such metadata as would be evident to a user of that ESI accessing it in the ordinary course of  
28 YOUR affairs, and all metadata extracted by YOU for YOUR use, including metadata created to

1 identify the origin, nature or contents of such item of ESI, excepting only metadata embodying  
2 attorney work product. Metadata existing in distinct fields as stored in the ordinary course of  
3 YOUR affairs, or created by YOU in distinct fields, shall be produced in such a manner as to  
4 identify each field and maintain its segregation from other fields. In addition, all such material  
5 required to be produced as instructed herein in an electronically searchable format must be  
6 produced along with corresponding metadata in a load file so that DOCUMENTS produced may  
7 be processed for review with their corresponding metadata, INCLUDING: the date and time  
8 DOCUMENTS and COMMUNICATIONS were created, last accessed, last modified, sent, or  
9 received; the author(s), sender(s), and recipient(s); the file type; the file name; and the folder path  
10 where the file was stored.

11       2. To the extent these Requests for Production call for the production of ESI in native  
12 format, such material shall be so produced. To the extent any item of ESI is called for by multiple  
13 Requests for Production, at least one of which seeks native format and at least one of which does  
14 not, such item need only be produced once and should be produced in native format. No item of  
15 ESI shall be produced in native format unless it is responsive to a Request for Production that  
16 specifically calls for production in native format.

17       3. To the extent material called for by these Requests for Production does not consist  
18 of ESI, such material shall be produced as a digital image of the DOCUMENT in PDF format.  
19 Should YOU render such digital images electronically searchable, by association of such digital  
20 images with electronically searchable text documents, metadata, or otherwise, such digital  
21 images shall be produced in electronically searchable form including all electronically searchable  
22 fields, including metadata excepting only metadata embodying attorney work product, created  
23 by YOU.

24       **G. Objections**

25       If, in responding to these Requests for Production, YOU claim any ambiguity in  
26 interpreting the Request for Production, or in a definition or instruction applicable thereto, such  
27 claim shall not be utilized as a basis for refusing to respond, but YOU shall set forth as part of

28 ///

1 YOUR response the language deemed to be ambiguous and the interpretation used in responding  
2 to the Request for Production.

3 **III. DOCUMENTS REQUIRED TO BE PRODUCED**

4 **REQUEST FOR PRODUCTION NO. 1:**

5 All COMMUNICATIONS with DEFENDANT Nathan Fletcher, including, but not  
6 limited to, all text messages, Instagram direct messages (“DM’s”), Facebook messages, Twitter  
7 direct messages, e-mails, WhatsApp messages, or any other written form of  
8 COMMUNICATION (whether electronic, digital, or physical).

9 **REQUEST FOR PRODUCTION NO. 2:**

10 All photos depicting both YOU and DEFENDANT Nathan Fletcher.

11 **REQUEST FOR PRODUCTION NO. 3:**

12 All videos depicting both YOU and DEFENDANT Nathan Fletcher.


13 **REQUEST FOR PRODUCTION NO. 4:**

14 All voice recordings between YOU and DEFENDANT Nathan Fletcher.

15 DATE: June 20, 2023

**FISHER & PHILLIPS LLP**

16  
17 By:

  
\_\_\_\_\_  
Danielle Hultenius Moore  
Stephanie Reynolds  
Sean L. McKaveney  
Carola Murguia  
Attorneys for Nathan Fletcher



# EXHIBIT “B”

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Danielle Hultenius Moore (SBN 232480); Stephanie Reynolds (SBN 220090);  
Sean L. McKaveney (SBN 331374); Carola Murguia (SBN 334338)**FISHER & PHILLIPS LLP**4747 Executive Drive, Suite 1000  
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[smckaveney@fisherphillips.com](mailto:smckaveney@fisherphillips.com); [cmurguia@fisherphillips.com](mailto:cmurguia@fisherphillips.com)

ATTORNEY FOR (Name): Defendant Nathan Fletcher

FOR COURT USE ONLY

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego**

STREET ADDRESS: 330 West Broadway

MAILING ADDRESS: 330 West Broadway

CITY AND ZIP CODE: San Diego, California 92101

BRANCH NAME: Hall of Justice

PLAINTIFF/PETITIONER: Grecia Figueroa

DEFENDANT/RESPONDENT: Nathan Fletcher, et al.

**DEPOSITION SUBPOENA  
FOR PRODUCTION OF BUSINESS RECORDS**

CASE NUMBER:

37-2023-00012828-CU-OE-CTL

**THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):**

Custodian of Records of Meta Platforms, Inc. c/o CSC Lawyers Incorporating Service, 2710 Gateway Oaks Drive, Suite 150N, Sacramento, California, 95833

**1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:**

To (name of deposition officer): Titan Legal Services, Inc.

On (date): August 7, 2023

At (time): 10:00 a.m.

Location (address): 2050 West 190<sup>th</sup> Street, Suite 200, Torrance, California, 90504, (800)441-4107**Do not release the requested records to the deposition officer prior to the date and time stated above.**

- a.  by delivering a true, legible, and durable **copy** of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b.  by delivering a true, legible, and durable **copy** of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c.  by making the **original** business records described in item 3 available for inspection at your business address by the attorney's representative and permitting **copying** at your business address under reasonable conditions during normal business hours.
2. *The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.*
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):  
See Attachment 3, incorporated by this reference.

 Continued on Attachment 3.

- 4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.**

**DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.**

Date issued: July 7, 2023

Danielle Hultenius Moore

(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorneys for Defendant Nathan Fletcher

(TITLE)

(Proof of service on reverse)

Page 1 of 2

PLAINTIFF/PETITIONER: Grecia Figueroa  DEFENDANT/RESPONDENT: Nathan Fletcher, et al.	CASE NUMBER: 37-2023-00012828-CU-OE-CTL
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**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1)  Witness fees were paid.  
 Amount:..... \$ \_\_\_\_\_

(2)  Copying fees were paid.  
 Amount:..... \$ \_\_\_\_\_

f. Fee for service: ..... \$ \_\_\_\_\_

2. I received this subpoena for service on (*date*):

3. Person serving:

- a.  Not a registered California process server.
- b.  California sheriff or marshal.
- c.  Registered California process server.
- d.  Employee or independent contractor of a registered California process server.
- e.  Exempt from registration under Business and Professions Code section 22350(b).
- f.  Registered professional photocopier.
- g.  Exempt from registration under Business and Professions Code section 22451.
- h. Name, address, telephone number, and, if applicable, county of registration and number:

**I declare** under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

**(For California sheriff or marshal use only)**  
**I certify** that the foregoing is true and correct.

Date:

Date:

▶ \_\_\_\_\_

▶ \_\_\_\_\_

(SIGNATURE)

(SIGNATURE)



**Attachment 3**  
**Meta Platforms, Inc.**

1. All content reflecting direct messages between subscriber name: **nathan\_fletcher**, url: [https://www.instagram.com/nathan\\_fletcher/](https://www.instagram.com/nathan_fletcher/) (“Subscriber”) and Grecia Figueroa whose Instagram handle is **@grecia\_f**, and any and all other Instagram handles by Grecia Figueroa (collectively “Figueroa Handles”) from June 1, 2019 to the present.
2. All content reflecting all times the Subscriber’s posts and/or stories were viewed by Figueroa Handles from June 1, 2019 to the present.
3. All content reflecting all times any of the Subscriber’s posts and/or stories were “reacted to,” by Figueroa Handles from June 1, 2019 to the present.
4. All content reflecting all times the Subscriber “reacted to,” any posts and/or stories by Figueroa Handles from June 1, 2019 to the present.
5. All content reflecting all times any of the Subscriber’s posts and/or stories were “liked,” by Figueroa Handles from June 1, 2019 to the present.
6. All content reflecting all times the Subscriber “liked,” any posts and/or stories by Figueroa Handles from June 1, 2019 to the present.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Danielle Hultenius Moore (SBN 232480); Stephanie Reynolds (SBN 220090); Sean L. McKaveney (SBN 331374); Carola Murguia (SBN 334338) <b>FISHER &amp; PHILLIPS LLP</b> 4747 Executive Drive, Suite 1000 San Diego, California 92121 TELEPHONE NO.: (858)597-9600 FAX NO. (Optional): (858)597-9601 E-MAIL ADDRESS (Optional): dmoore@fisherphillips.com; sreynolds@fisherphillips.com; smckaveney@fisherphillips.com; cmurguia@fisherphillips.com ATTORNEY FOR (Name): Defendant Nathan Fletcher	FOR COURT USE ONLY
<b>SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego</b> STREET ADDRESS: 330 West Broadway MAILING ADDRESS: 330 West Broadway CITY AND ZIP CODE: San Diego, California 92101 BRANCH NAME: Hall of Justice	
PLAINTIFF/ PETITIONER: Grecia Figueroa DEFENDANT/ RESPONDENT: Nathan Fletcher, et al.	CASE NUMBER: 37-2023-00012828-CU-OE-CTL
<p style="text-align: center;"><b>NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION</b> (Code Civ. Proc., §§ 1985.3, 1985.6)</p>	

**NOTICE TO CONSUMER OR EMPLOYEE**

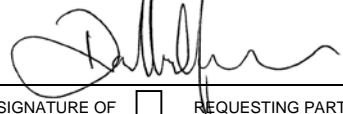
**TO (name):** Grecia Figueroa

- PLEASE TAKE NOTICE THAT **REQUESTING PARTY (name):** Defendant Nathan Fletcher SEEKS YOUR RECORDS FOR EXAMINATION by the parties to this action on (specify date): August 7, 2023  
 The records are described in the subpoena directed to **witness (specify name and address of person or entity from whom records are sought):** Meta Platforms, Inc. c/o CSC Lawyers Incorporating Service, 2710 Gateway Oaks Drive, Suite 150N, Sacramento, California, 95833  
 A copy of the subpoena is attached.
- IF YOU OBJECT to the production of these records, YOU MUST DO ONE OF THE FOLLOWING BEFORE THE DATE SPECIFIED. IN ITEM a. OR b. BELOW:
  - If you are a party to the above-entitled action, you must file a motion pursuant to Code of Civil Procedure section 1987.1 to quash or modify the subpoena and give notice of that motion to the **witness** and the **deposition officer** named in the subpoena at least five days before the date set for production of the records.
  - If you are not a party to this action, you must serve on the **requesting party** and on the **witness**, before the date set for production of the records, a written objection that states the specific grounds on which production of such records should be prohibited. You may use the form below to object and state the grounds for your objection. You must complete the Proof of Service on the reverse side indicating whether you personally served or mailed the objection. The objection should **not** be filed with the court. **WARNING: IF YOUR OBJECTION IS NOT RECEIVED BEFORE THE DATE SPECIFIED IN ITEM 1, YOUR RECORDS MAY BE PRODUCED AND MAY BE AVAILABLE TO ALL PARTIES.**
- YOU OR YOUR ATTORNEY MAY CONTACT THE UNDERSIGNED to determine whether an agreement can be reached in writing to cancel or limit the scope of the subpoena. If no such agreement is reached, and if you are not otherwise represented by an attorney in this action, YOU SHOULD CONSULT AN ATTORNEY TO ADVISE YOU OF YOUR RIGHTS OF PRIVACY.

Date: July 7, 2023

Danielle Hultenius Moore

(TYPE OR PRINT NAME)

  
 (SIGNATURE OF  REQUESTING PARTY  ATTORNEY)

**OBJECTION BY NON-PARTY TO PRODUCTION OF RECORDS**

- I object to the production of all of my records specified in the subpoena.
- I object only to the production of the following specified records:
- The specific grounds for my objection are as follows:

Date:

(TYPE OR PRINT NAME)

(SIGNATURE)

(Proof of service on reverse)

PLAINTIFF/PETITIONER: Grecia Figueroa DEFENDANT/RESPONDENT: Nathan Fletcher, et al	CASE NUMBER: 37-2023-00012828-CU-OE-CTL
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**PROOF OF SERVICE OF NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION**  
(Code Civ. Proc., §§ 1985.3,1985.6)

Personal Service     Mail

1. At the time of service I was at least 18 years of age and **not a party to this legal action.**
2. I served a copy of the *Notice to Consumer or Employee and Objection* as follows (check either a or b):
  - a.  **Personal service.** I personally delivered the *Notice to Consumer or Employee and Objection* as follows:
 

(1) Name of person served:	(3) Date served:
(2) Address where served:	(4) Time served:
  - b.  **Mail.** I deposited the *Notice to Consumer or Employee and Objection* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 

(1) Name of person served:	(3) Date of mailing:
(2) Address:	(4) Place of mailing (city and state):
- (5) I am a resident of or employed in the county where the *Notice to Consumer or Employee and Objection* was mailed.
- c. My residence or business address is (specify):
- d. My phone number is (specify):

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  
Date: \_\_\_\_\_

_____	▶	_____
(TYPE OR PRINT NAME OF PERSON WHO SERVED)		(SIGNATURE OF PERSON WHO SERVED)

**PROOF OF SERVICE OF OBJECTION TO PRODUCTION OF RECORDS**  
(Code Civ. Proc., §§ 1985.3,1985.6)

Personal Service     Mail

1. At the time of service I was at least 18 years of age and **not a party to this legal action.**
2. I served a copy of the *Objection to Production of Records* as follows (complete either a or b):
  - a. ON THE REQUESTING PARTY
    - (1)  **Personal service.** I personally delivered the *Objection to Production of Records* as follows:
 

(i) Name of person served:	(iii) Date served:
(ii) Address where served:	(iv) Time served:
    - (2)  **Mail.** I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 

(i) Name of person served:	(iii) Date of mailing:
(ii) Address:	(iv) Place of mailing (city and state):
  - (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
  - b. ON THE WITNESS
    - (1)  **Personal service.** I personally delivered the *Objection to Production of Records* as follows:
 

(i) Name of person served:	(iii) Date served:
(ii) Address where served:	(iv) Time served:
    - (2)  **Mail.** I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 

(i) Name of person served:	(iii) Date of mailing:
(ii) Address:	(iv) Place of mailing (city and state):
  - (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
3. My residence or *business* address is (specify):
4. My phone number is (specify):

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.  
Date: \_\_\_\_\_

_____	▶	_____
(TYPE OR PRINT NAME OF PERSON WHO SERVED)		(SIGNATURE OF PERSON WHO SERVED)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Danielle Hultenius Moore (SBN 232480); Stephanie Reynolds (SBN 220090);  
Sean L. McKaveney (SBN 331374); Carola Murguia (SBN 334338)**FISHER & PHILLIPS LLP**4747 Executive Drive, Suite 1000  
San Diego, California 92121

TELEPHONE NO.: (858)597-9600

FAX NO.: (858)597-9601

E-MAIL ADDRESS: [dmoore@fisherphillips.com](mailto:dmoore@fisherphillips.com); [sreynolds@fisherphillips.com](mailto:sreynolds@fisherphillips.com);  
[smckaveney@fisherphillips.com](mailto:smckaveney@fisherphillips.com); [cmurguia@fisherphillips.com](mailto:cmurguia@fisherphillips.com)

ATTORNEY FOR (Name): Defendant Nathan Fletcher

FOR COURT USE ONLY

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego**

STREET ADDRESS: 330 West Broadway

MAILING ADDRESS: 330 West Broadway

CITY AND ZIP CODE: San Diego, California 92101

BRANCH NAME: Hall of Justice

PLAINTIFF/PETITIONER: Grecia Figueroa

DEFENDANT/RESPONDENT: Nathan Fletcher, et al.

**DEPOSITION SUBPOENA  
FOR PRODUCTION OF BUSINESS RECORDS**

CASE NUMBER:

37-2023-00012828-CU-OE-CTL

**THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):**

Custodian of Records of Meta Platforms, Inc. c/o CSC Lawyers Incorporating Service, 2710 Gateway Oaks Drive, Suite 150N, Sacramento, California, 95833

**1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:**

To (name of deposition officer): Titan Legal Services, Inc.

On (date): August 7, 2023

At (time): 10:00 a.m.

Location (address): 2050 West 190<sup>th</sup> Street, Suite 200, Torrance, California, 90504, (800)441-4107**Do not release the requested records to the deposition officer prior to the date and time stated above.**

- a.  by delivering a true, legible, and durable **copy** of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b.  by delivering a true, legible, and durable **copy** of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c.  by making the **original** business records described in item 3 available for inspection at your business address by the attorney's representative and permitting **copying** at your business address under reasonable conditions during normal business hours.
2. *The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.*
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):  
See Attachment 3, incorporated by this reference.

 Continued on Attachment 3.

- 4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.**

**DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.**

Date issued: July 7, 2023

Danielle Hultenius Moore

(TYPE OR PRINT NAME)



(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorneys for Defendant Nathan Fletcher

(TITLE)

(Proof of service on reverse)

Page 1 of 2

PLAINTIFF/PETITIONER: Grecia Figueroa  DEFENDANT/RESPONDENT: Nathan Fletcher, et al.	CASE NUMBER: 37-2023-00012828-CU-OE-CTL
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**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1)  Witness fees were paid.  
 Amount:..... \$ \_\_\_\_\_

(2)  Copying fees were paid.  
 Amount:..... \$ \_\_\_\_\_

f. Fee for service: ..... \$ \_\_\_\_\_

2. I received this subpoena for service on (*date*):

3. Person serving:

- a.  Not a registered California process server.
- b.  California sheriff or marshal.
- c.  Registered California process server.
- d.  Employee or independent contractor of a registered California process server.
- e.  Exempt from registration under Business and Professions Code section 22350(b).
- f.  Registered professional photocopier.
- g.  Exempt from registration under Business and Professions Code section 22451.
- h. Name, address, telephone number, and, if applicable, county of registration and number:

**I declare** under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

**(For California sheriff or marshal use only)**  
**I certify** that the foregoing is true and correct.

Date:

Date:

▶ \_\_\_\_\_

▶ \_\_\_\_\_

(SIGNATURE)

(SIGNATURE)

**Attachment 3**  
**Meta Platforms, Inc.**

1. All content reflecting direct messages between subscriber name: **nathan\_fletcher**, url: [https://www.instagram.com/nathan\\_fletcher/](https://www.instagram.com/nathan_fletcher/) (“Subscriber”) and Grecia Figueroa whose Instagram handle is **@grecia\_f**, and any and all other Instagram handles by Grecia Figueroa (collectively “Figueroa Handles”) from June 1, 2019 to the present.
2. All content reflecting all times the Subscriber’s posts and/or stories were viewed by Figueroa Handles from June 1, 2019 to the present.
3. All content reflecting all times any of the Subscriber’s posts and/or stories were “reacted to,” by Figueroa Handles from June 1, 2019 to the present.
4. All content reflecting all times the Subscriber “reacted to,” any posts and/or stories by Figueroa Handles from June 1, 2019 to the present.
5. All content reflecting all times any of the Subscriber’s posts and/or stories were “liked,” by Figueroa Handles from June 1, 2019 to the present.
6. All content reflecting all times the Subscriber “liked,” any posts and/or stories by Figueroa Handles from June 1, 2019 to the present.

**PROOF OF SERVICE  
(CCP §§1013(a) and 2015.5)**

I, the undersigned, am at least 18 years old and not a party to this action. I am employed in the County of San Diego with the law offices of Fisher & Phillips LLP and its business address is 4747 Executive Drive, Suite 1000, San Diego, California, 92121.

On July 7, 2023, I served the following document(s) **NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION with Deposition Subpoena for Production of Business Records and Attachment 3** on the person(s) listed below by placing  *the original*  *a true copy* thereof enclosed in sealed envelope(s) addressed as follows:

<i>E-Service Per C.C.P. §1010.6 (Eff. 01/01/23)</i> Zachary S. Schumacher (SBN 286898) SCHUMACHER PC 1901 1 <sup>st</sup> Avenue, First Floor San Diego, California 92101	Telephone: (619)344-0800 E-Mail: <a href="mailto:zach@schumacher-law.com">zach@schumacher-law.com</a> Attorneys for Grecia Figueroa
---	---

- [by MAIL]** - I enclosed the document(s) in a sealed envelope or package addressed to the person(s) whose address(es) are listed above and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in San Diego, California, in a sealed envelope with postage fully prepaid.
- [by FAX]** - Based on an agreement of the parties to accept service by fax transmission, I faxed the document(s) to the person(s) at fax number(s) listed above from fax number (858)597-9601. The fax reported no errors. A copy of the transmission report is attached.
- [by OVERNIGHT DELIVERY]** - I enclosed the document(s) in an envelope or package provided by an overnight delivery carrier and addressed to the person(s) at the address(es) listed above. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight carrier.
- [by ELECTRONIC SERVICE]** - Pursuant to Code of Civil Procedure section 1010.6 (effective January 1, 2023), I electronically served the document(s) to the person(s) at the electronic service address(es) listed above.
- [by PERSONAL SERVICE]** - I delivered the document(s) to the person(s) at the address(es) listed above by (1) (a) personal delivery, or (b) by leaving the documents in an envelope/package with an individual in charge of the office, or (c) by leaving them in a conspicuous place in the office between the hours of 9:00 a.m. and 6:00 p.m., or (2) by messenger – a copy of the Messenger Declaration is attached.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

Executed July 7, 2023, at San Diego, California.

Susan E. Valle  
\_\_\_\_\_  
Print Name

By: Susan E. Valle  
\_\_\_\_\_  
Signature

# EXHIBIT “C”



1 ZACHARY S. SCHUMACHER (SBN 286898)  
zach@schumacher-law.com  
2 **SCHUMACHER PC**  
1901 1st Avenue, First Floor  
3 San Diego, CA 92101  
Tel: (619) 344-0800  
4

5 JESSICA K. PRIDE (SBN 249212)  
jpride@pridelawfirm.com  
6 DANTE T. PRIDE (SBN 262362)  
dpride@pridelawfirm.com  
7 ZACHARY FREIRE-AVIÑA (SBN 325460)  
zfa@pridelawfirm.com  
8 **THE PRIDE LAW FIRM**  
2831 Camino Del Rio S, Suite 104  
9 San Diego, California 92108  
Telephone: 619-516-8166  
10 Facsimile: 619-785-3414

11 Attorneys for Plaintiff GRECIA FIGUEROA  
12  
13

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
15 **COUNTY OF SAN DIEGO – HALL OF JUSTICE**  
16

17 GRECIA FIGUEROA, an individual,

18 Plaintiff(s),

19 v.

20 NATHAN FLETCHER, an individual;  
21 SAN DIEGO METROPOLITAN  
TRANSIT SYSTEM, a California public  
22 agency; and DOES 1-120, Inclusive,

23 Defendant(s).

CASE NO. 37-2023-00012828-CU-OE-CTL

**PLAINTIFF’S RESPONSES TO DEFENDANT  
NATHAN FLETCHER’S REQUEST FOR  
PRODUCTION OF DOCUMENTS, SET ONE  
(1)**

Judge: Hon. Matthew C. Braner  
Dept. C-60

Complaint Filed: March 28, 2023

24  
25 **PROPOUNDING PARTY: DEFENDANT NATHAN FLETCHER**

26 **RESPONDING PARTY: PLAINTIFF GRECIA FIGUEROA**

27 **SET NUMBER: ONE**  
28

1 **PRELIMINARY STATEMENT**

2 These responses are made solely for the purpose of, and in relation to, this action. Each  
3 answer is given subject to all appropriate objections (including but not limited to objections  
4 concerning competency, relevancy, materiality, propriety and admissibility) which would require  
5 the exclusion of any statement contained herein if the Interrogatory were asked of, or any  
6 statement contained herein were made by, a witness present and testifying in Court. All such  
7 objections and grounds therefore are reserved and may be interposed at the time of trial.

8 The party on whose behalf the answers are given has not yet completed investigation of  
9 the facts relating to this action, has not yet completed discovery in this action, and has not yet  
10 completed preparation for trial. Consequently, the following answers are given without prejudice  
11 to the answering party's right to produce, at the time of trial, subsequently discovered evidence  
12 relating to the proof of facts subsequently discovered to be material.

13 Except for facts explicitly admitted herein, no admission of any nature whatsoever is to be  
14 implied or inferred. The fact that any Interrogatory herein has been answered should not be taken  
15 as an admission, or a concession of the existence, of any facts set forth or assumed by such  
16 Interrogatory, or that such answer constitutes evidence of any fact thus set forth or assumed. All  
17 answers must be construed as given on the basis of present recollection. Any Interrogatory  
18 deemed as continuing is objected to as oppressive, over burdensome, improper and not in  
19 compliance with Code of Civil Procedure Section 2030.010, *et seq.*, and will not be regarded as  
20 continuing in nature.

21 **REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS**

22 **REQUEST FOR PRODUCTION NO. 1:**

23 All COMMUNICATIONS with DEFENDANT Nathan Fletcher, including, but not  
24 limited to, all text messages, Instagram direct messages ("DM's"), Facebook messages, Twitter  
25 direct messages, e-mails, WhatsApp messages, or any other written form of  
26 COMMUNICATION (whether electronic, digital, or physical).

27 ///

28 ///

1 **RESPONSE:**

2           Objection(s): This request is premature. Responding Party objects to the extent this  
3 interrogatory calls for information that is, or should be, equally available to Propounding Party.  
4 Furthermore, this interrogatory is overbroad, particularly with regard to time and scope, and  
5 contains improper subparts. Finally, Responding Party objects to the extent this interrogatory seeks  
6 information protected by the attorney-client privilege, attorney work product doctrine, or the right  
7 to privacy.

8           Subject to and without waiving the foregoing objection(s), Responding Party responds as  
9 follows: Responding Party will produce responsive, non-privileged documents/things presently in  
10 its possession, custody, or control to the extent such documents/things are relevant to this action.  
11 Discovery and investigation are ongoing, Responding Party reserves the right to amend and/or  
12 supplement this response when and if additional information is ascertained.

13 **REQUEST FOR PRODUCTION NO. 2:**

14           All photos depicting both YOU and DEFENDANT Nathan Fletcher.

15 **RESPONSE:**

16           Objection(s): This request is premature. Responding Party objects to the extent this  
17 interrogatory calls for information that is, or should be, equally available to Propounding Party.  
18 Furthermore, this interrogatory is overbroad, particularly with regard to time and scope. Finally,  
19 Responding Party objects to the extent this interrogatory seeks information protected by the  
20 attorney-client privilege, attorney work product doctrine, or the right to privacy.

21           Subject to and without waiving the foregoing objection(s), Responding Party responds as  
22 follows: Responding Party will produce responsive, non-privileged documents/things presently in  
23 its possession, custody, or control to the extent such documents/things are relevant to this action.  
24 Discovery and investigation are ongoing, Responding Party reserves the right to amend and/or  
25 supplement this response when and if additional information is ascertained.

26 **REQUEST FOR PRODUCTION NO. 3:**

27           All DOCUMENT(S) RELATING TO YOUR COMMUNICATIONS with PLAINTIFF in  
28 the last five (5) years.

1 **RESPONSE:**

2           Objection(s): This request is premature. Responding Party objects to the extent this  
3 interrogatory calls for information that is, or should be, equally available to Propounding Party.  
4 Furthermore, this interrogatory is overbroad, particularly with regard to time and scope. Finally,  
5 Responding Party objects to the extent this interrogatory seeks information protected by the  
6 attorney-client privilege, attorney work product doctrine, or the right to privacy.

7           Subject to and without waiving the foregoing objection(s), Responding Party responds as  
8 follows: Responding Party will produce responsive, non-privileged documents/things presently in  
9 its possession, custody, or control to the extent such documents/things are relevant to this action.  
10 Discovery and investigation are ongoing, Responding Party reserves the right to amend and/or  
11 supplement this response when and if additional information is ascertained.

12 **REQUEST FOR PRODUCTION NO. 4:**

13           All voice recordings between YOU and DEFENDANT Nathan Fletcher.

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1 **RESPONSE:**

2           Objection(s): This request is premature. Responding Party objects to the extent this  
3 interrogatory calls for information that is, or should be, equally available to Propounding Party.  
4 Furthermore, this interrogatory is overbroad, particularly with regard to time and scope. Finally,  
5 Responding Party objects to the extent this interrogatory seeks information protected by the  
6 attorney-client privilege, attorney work product doctrine, or the right to privacy.

7           Subject to and without waiving the foregoing objection(s), Responding Party responds as  
8 follows: Responding Party will produce responsive, non-privileged documents/things presently in  
9 its possession, custody, or control to the extent such documents/things are relevant to this action.  
10 Discovery and investigation are ongoing, Responding Party reserves the right to amend and/or  
11 supplement this response when and if additional information is ascertained.

12  
13 Dated: July 24, 2023

**THE PRIDE LAW FIRM**

14  
15 By:   
16 \_\_\_\_\_  
17 JESSICA K. PRIDE  
18 DANTE T. PRIDE  
19 ZACHARY FREIRE-AVIÑA  
20 Attorneys for Plaintiff  
21 GRECIA FIGUEROA  
22  
23  
24  
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VERIFICATION

1

Verification C.C.P. 2015.5

I, Grecia Figueroa, have read the foregoing

• **REQUESTS FOR PRODUCTION (SET ONE)**

I am a party to this action and have aided in responses thereto. The matters stated in the

foregoing documents are true of my own knowledge, except as to those matters which are stated

on information and belief, and as to those matters, I believe them to be true.

Executed on 07/24, 2023, at San Diego, California.

I declare under penalty of perjury under the laws of the State of California that the foregoing

is true and correct.



GRECIA FIGUEROA

# EXHIBIT “D”

1 ZACHARY S. SCHUMACHER (SBN 286898)  
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1901 1st Avenue, First Floor  
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9 San Diego, California 92108  
Telephone: 619-516-8166  
10 Facsimile: 619-785-3414

11 Attorneys for Plaintiff GRECIA FIGUEROA  
12  
13

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
15 **COUNTY OF SAN DIEGO – HALL OF JUSTICE**  
16

17 GRECIA FIGUEROA, an individual,

18 Plaintiff(s),

19 v.

20 NATHAN FLETCHER, an individual;  
21 SAN DIEGO METROPOLITAN  
TRANSIT SYSTEM, a California public  
22 agency; and DOES 1-120, Inclusive,

23 Defendant(s).

CASE NO. 37-2023-00012828-CU-OE-CTL

**PLAINTIFF’S REQUEST FOR PRODUCTION  
OF DOCUMENTS TO DEFENDANT NATHAN  
FLETCHER, SET ONE (1)**

Judge: Hon. Matthew C. Braner  
Dept. C-60

Complaint Filed: March 28, 2023

24 **PROPOUNDING PARTY: PLAINTIFF GRECIA FIGUEROA**

25 **RESPONDING PARTY: DEFENDANT NATHAN FLETCHER**

26 **SET NUMBER: ONE**  
27  
28



1 the pleadings filed by PLAINTIFF in the instant action, including the allegations,  
2 facts and events described therein or any similar action, issue(s) or undertakings.

3 11. The terms "RELATING TO" mean consisting of, referring to, describing,  
4 discussing, reflecting, mentioning, evidencing, containing, pertaining to, citing,  
5 summarizing, analyzing, or bearing any logical or factual relevance or connection to  
6 the matter which is being discussed.

7 12. The term "MTS" shall mean SAN DIEGO METROPOLITAN TRANSIT SYSTEM,  
8 who is a co-defendant herein and was YOUR employer for relevant time periods in  
9 the COMPLAINT.

10 **REQUESTS FOR PRODUCTION OF DOCUMENTS AND THINGS**

11 **REQUEST FOR PRODUCTION NO. 1:**

12 All DOCUMENT(S) RELATING TO or found in YOUR personnel file with MTS.

13 **REQUEST FOR PRODUCTION NO. 2:**

14 All DOCUMENT(S) RELATING TO any performance reviews or evaluations of YOU  
15 while employed at MTS.

16 **REQUEST FOR PRODUCTION NO. 3:**

17 All DOCUMENT(S) RELATING TO YOUR COMMUNICATIONS with PLAINTIFF in  
18 the last five (5) years.

19 **REQUEST FOR PRODUCTION NO. 4:**

20 All DOCUMENT(S), including without limitation, COMMUNICATIONS with MTS,  
21 RELATING TO PLAINTIFF.

22 **REQUEST FOR PRODUCTION NO. 5:**

23 All DOCUMENT(S) RELATING TO any and all warnings, whether oral or written, YOU  
24 received from MTS during YOUR employment as Chair of the MTS Board of Directors.

25 **REQUEST FOR PRODUCTION NO. 6:**

26 All DOCUMENT(S) RELATING TO PLAINTIFF, including but not limited to, any e-  
27 mails YOU sent to or received from PLAINTIFF and any emails YOU sent to or received that  
28 pertain to PLAINTIFF.

1 **REQUEST FOR PRODUCTION NO. 36:**

2 All VIDEOS depicting both YOU and PLAINTIFF.

3 **REQUEST FOR PRODUCTION NO. 37:**

4 All voice recordings between YOU and PLAINTIFF.

5 **REQUEST FOR PRODUCTION NO. 38:**

6 All DOCUMENT(S) RELATING TO PLAINTIFF.

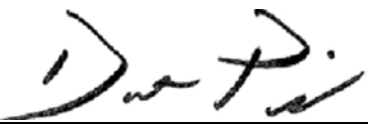
7

8 Dated: July 19, 2023

**THE PRIDE LAW FIRM**

9

10

By: 

11

JESSICA K. PRIDE  
DANTE T. PRIDE  
ZACHARY FREIRE-AVIÑA  
Attorneys for Plaintiff  
GRECIA FIGUEROA

12

13

14

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21

22

23

24

25

26

27

28

1 PROOF OF SERVICE

2 I am employed by The Pride Law Firm in the County of San Diego, State of California. I  
3 am over the age of 18 years and not a party to this action. My business address is 2831 Camino  
4 Del Rio South, Suite 104 San Diego, CA 92108. On May 18, 2023, I caused to be served the  
5 following document(s):

- 6 • **PLAINTIFF’S FORM INTERROGATORIES-GENERAL TO DEFENDANT NATHAN FLETCHER, SET ONE**
- 7 • **PLAINTIFF’S REQUEST FOR PRODUCTION TO DEFENDANT NATHAN FLETCHER, SET ONE**
- 8 • **PLAINTIFF’S SPECIAL INTERROGATORIES TO DEFENDANT NATHAN FLETCHER, SET ONE**
- 9 • **PLAINTIFF’S REQUEST FOR ADMISSIONS TO DEFENDANT NATHAN FLETCHER, SET ONE**

10 on all parties’ registered attorneys of record at:

11  
12 Danielle Hultenius Moore, Esq.  
13 [dmoore@fisherphillips.com](mailto:dmoore@fisherphillips.com)  
14 Stephanie Reynolds, Esq.  
15 [sreynolds@fisherphillips.com](mailto:sreynolds@fisherphillips.com)  
16 Sean L. McKaveney, Esq.  
17 [smckaveney@fisherphillips.com](mailto:smckaveney@fisherphillips.com)  
18 Carola Murguia, Esq.  
19 [cmurguia@fisherphillips.com](mailto:cmurguia@fisherphillips.com)  
20 FISHER & PHILLIPS, LLP  
21 4747 Executive Drive, Suite 1000  
22 San Diego, CA 92121  
23 Attorneys for Defendant Nathan Fletcher

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Corrin M. Phillip, Esq.  
[cphillip@meyersnave.com](mailto:cphillip@meyersnave.com)  
MEYERS NAVE  
600 B Street, Suite 1650  
San Diego, California 92101  
Telephone: (619) 330-1700  
Facsimile: (619) 330-1701  
Attorneys for Defendant San Diego  
Metropolitan Transit System

24 [x] **(BY EMAIL)** I caused such document(s) to be delivered by electronic mail to the email  
25 addresses of the addressee(s): [dmoore@fisherphillips.com](mailto:dmoore@fisherphillips.com); [sreynolds@fisherphillips.com](mailto:sreynolds@fisherphillips.com);  
26 [smckaveney@fisherphillips.com](mailto:smckaveney@fisherphillips.com); [cmurguia@fisherphillips.com](mailto:cmurguia@fisherphillips.com); [jbrown@meyersnave.com](mailto:jbrown@meyersnave.com);  
27 [cphillip@meyersnave.com](mailto:cphillip@meyersnave.com); [ewilliams@meyersnave.com](mailto:ewilliams@meyersnave.com) (C.C.P. § 1013(g)).

28 I declare under penalty of perjury under the laws of the State of California that the above  
is true and correct. Executed on July 19, 2023 at San Diego, California.

  
\_\_\_\_\_  
Estefania White

# EXHIBIT “E”

**From:** [McKaveney, Sean](#)  
**To:** [Stef White](#); [Dante Pride](#); [Jessica Pride](#); [Zachary Freire-Aviña](#); [Bianca Orozco](#)  
**Cc:** [jbrown@meyersnave.com](#); [cphillip@meyersnave.com](#); [ewilliams@meyersnave.com](#); [Arla Clark](#); [Zachary Schumacher](#); [Reynolds, Stephanie](#); [Moore, Danielle](#)  
**Subject:** RE: Figueroa v. Fletcher, et al. | Plaintiff's Responses to Defendant Fletcher's RFPs, Set One  
**Date:** Tuesday, July 25, 2023 10:47:52 AM  
**Attachments:** [image001.png](#)  
[image002.png](#)  
[image003.png](#)  
[image004.png](#)  
[image005.png](#)  
[image006.png](#)  
[McKaveney to Pride - M+C re Plaintiff's Discovery Responses\(47770704.1\).pdf](#)

---

Good morning,

Happy Tuesday. I am following-up regarding the status of the document production that was omitted from yesterday's email. Please also see the attached meet and confer letter regarding deficiencies in Plaintiff's Discovery Responses.

I am available to discuss on the phone if you have any questions.

Thanks,

Sean McKaveney



**Sean McKaveney**  
Associate

Fisher & Phillips LLP  
4747 Executive Drive | Suite 1000 | San Diego, CA 92121  
[smckaveney@fisherphillips.com](mailto:smckaveney@fisherphillips.com) | O: (858) 666-3302

[vCard](#) | [Bio](#) | [Website](#) *On the Front Lines of Workplace Law<sup>SM</sup>*

---

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---

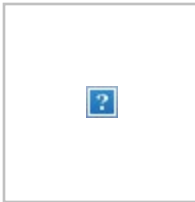
**From:** McKaveney, Sean  
**Sent:** Monday, July 24, 2023 3:59 PM  
**To:** Stef White <[swhite@pridelawfirm.com](mailto:swhite@pridelawfirm.com)>; Reynolds, Stephanie <[sreynolds@fisherphillips.com](mailto:sreynolds@fisherphillips.com)>; Moore, Danielle <[dmoore@fisherphillips.com](mailto:dmoore@fisherphillips.com)>; Murguia, Carola <[cmurguia@fisherphillips.com](mailto:cmurguia@fisherphillips.com)>  
**Cc:** [jbrown@meyersnave.com](#); [cphillip@meyersnave.com](#); [ewilliams@meyersnave.com](#); [Dante Pride](#) <[dpride@pridelawfirm.com](mailto:dpride@pridelawfirm.com)>; [Arla Clark](#) <[aclark@pridelawfirm.com](mailto:aclark@pridelawfirm.com)>; [Jessica Pride](#) <[jpride@pridelawfirm.com](mailto:jpride@pridelawfirm.com)>; [Zachary Freire-Aviña](#) <[zfa@pridelawfirm.com](mailto:zfa@pridelawfirm.com)>; [Zachary Schumacher](#) <[zach@schumacher-law.com](mailto:zach@schumacher-law.com)>; [Bianca Orozco](#) <[borozco@pridelawfirm.com](mailto:borozco@pridelawfirm.com)>  
**Subject:** RE: Figueroa v. Fletcher, et al. | Plaintiff's Responses to Defendant Fletcher's RFPs, Set One

Thank you Ms. White,

It appears that the document production was not attached to your email. Can you please send that over as well?

Best,

Sean McKaveney



**Sean McKaveney**  
Associate

Fisher & Phillips LLP  
4747 Executive Drive | Suite 1000 | San Diego, CA 92121  
[smckaveney@fisherphillips.com](mailto:smckaveney@fisherphillips.com) | O: (858) 666-3302

[vCard](#) | [Bio](#) | [Website](#) **On the Front Lines of Workplace Law<sup>SM</sup>**

---

*This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error, then immediately delete this message.*

---

**From:** Stef White <[swhite@pridelawfirm.com](mailto:swhite@pridelawfirm.com)>

**Sent:** Monday, July 24, 2023 3:50 PM

**To:** Reynolds, Stephanie <[sreynolds@fisherphillips.com](mailto:sreynolds@fisherphillips.com)>; Moore, Danielle <[dmoore@fisherphillips.com](mailto:dmoore@fisherphillips.com)>; McKaveney, Sean <[smckaveney@fisherphillips.com](mailto:smckaveney@fisherphillips.com)>; Murguia, Carola <[cmurguia@fisherphillips.com](mailto:cmurguia@fisherphillips.com)>

**Cc:** [jbrown@meyersnave.com](mailto:jbrown@meyersnave.com); [cphillip@meyersnave.com](mailto:cphillip@meyersnave.com); [ewilliams@meyersnave.com](mailto:ewilliams@meyersnave.com); Dante Pride <[dpride@pridelawfirm.com](mailto:dpride@pridelawfirm.com)>; Arla Clark <[aclark@pridelawfirm.com](mailto:aclark@pridelawfirm.com)>; Jessica Pride <[jpride@pridelawfirm.com](mailto:jpride@pridelawfirm.com)>; Zachary Freire-Aviña <[zfa@pridelawfirm.com](mailto:zfa@pridelawfirm.com)>; Zachary Schumacher <[zach@schumacher-law.com](mailto:zach@schumacher-law.com)>; Bianca Orozco <[borozco@pridelawfirm.com](mailto:borozco@pridelawfirm.com)>

**Subject:** Re: Figueroa v. Fletcher, et al. | Plaintiff's Responses to Defendant Fletcher's RFPs, Set One

Dear Counsel,

Attached, please find Plaintiff's responses to Defendant Fletcher's Request for Production of Documents. Thank you.



THE  
**PRIDE**  
LAW FIRM

**Stef White**

Paralegal/Office Manager

---

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---



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reply to this message and follow with its deletion, so that we can ensure such a mistake does not occur in the future.

# EXHIBIT “F”





fisherphillips.com

July 25, 2023

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**Writer's E-mail:**  
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**Via E-Mail** [jpride@pridelawfirm.com](mailto:jpride@pridelawfirm.com); [dpride@pridelawfirm.com](mailto:dpride@pridelawfirm.com); [zfa@pridelawfirm.com](mailto:zfa@pridelawfirm.com); [zach@schumacher-law.com](mailto:zach@schumacher-law.com)

Jessica Pride  
Dante Pride  
The Pride Law Firm  
2831 Camino Del Rio South, Ste 104  
San Diego, CA 92108

Zachary Schumacher  
Schumacher PC  
1901 1<sup>st</sup> Avenue, First Floor  
San Diego, CA 92101

Re: *Figueroa v. Fletcher, et al.*  
*San Diego Superior Court Case: 37-2023-00012828-CU-OE-CTL*

Dear Ms. Pride:

Please accept this correspondence as our attempt to meet and confer regarding Plaintiff Grecia Figueroa's responses to Mr. Nathan Fletcher's Request for Production (Set One). For the reasons set forth below, we request that Plaintiff immediately amend her responses and produce all responsive documents by the close of business on Friday, **July 28, 2023**. Otherwise, we will promptly file a Motion to Compel and Request for Sanctions.

As an initial matter, Plaintiff has failed to produce any responsive documents, despite her verified responses indicating that she would comply with each of Mr. Fletcher's requests. We have also not received any acknowledgement or response to our follow-up July 24, 2023 email regarding the whereabouts of the responsive materials. This is inappropriate, unprofessional, and contrary to the Code of Civil Procedure. Critically, it is *indisputable* that all responsive documents are *currently* in the possession of Plaintiff and her counsel, given that those documents were published and quoted at length in the initial Complaint filed on March 28, 2023, as well as the First Amended Complaint that was filed on July 14, 2023. In light of these facts, it is unclear why the documents are being deliberately withheld from production and we will immediately file a motion

**Fisher & Phillips LLP**

Atlanta • Baltimore • Boston • Charlotte • Chicago • Cleveland • Columbia • Columbus • Dallas • Denver • Detroit • Fort Lauderdale • Gulfport • Houston  
Irvine • Kansas City • Las Vegas • Los Angeles • Louisville • Memphis • Nashville • New Jersey • New Orleans • New York • Orlando • Philadelphia  
Phoenix • Pittsburgh • Portland • Sacramento • San Diego • San Francisco • Seattle • Tampa • Washington, DC • Woodland Hills

to compel production – and seek sanctions – if Plaintiff does not produce all responsive material by the close of business on **July 28, 2023**. There is simply no reasonable explanation for this delay, other than obvious, inappropriate gamesmanship on Plaintiff's part.

In addition to Plaintiff's refusal to timely produce documents, her responses are not code-compliant. To this end, in response to each of Mr. Fletcher's requests, Plaintiff states:

"Responding Party will produce responsive, non-privileged documents/things presently in its possession, custody, or control *to the extent such documents/things are relevant to this action...*" (Emphasis added).

Plaintiff's qualification is improper, and she may not limit production to those documents that she personally deems relevant. This limitation is also wholly unnecessary, given that the requests do not call for any irrelevant material and instead only ask for documents that were transmitted between Plaintiff and Mr. Fletcher. According to Plaintiff's Complaint, those communications demonstrate wrongdoing by Mr. Fletcher towards Plaintiff including, but not limited to, her allegation that Mr. Fletcher revealed in those communications his alleged desire to have sex with Plaintiff. These communications are directly relevant to Plaintiff's claims. Additionally, Plaintiff's response to Request for Production No. 3 must specifically be amended, given that her response seemingly agrees to produce documents responsive *to her own discovery*. (Compare: *Plaintiff's RFP #3* verse *Fletcher's RFP #3*). In sum, Plaintiff must amend each of her responses to affirm that she will produce all material in her possession, custody and control that is responsive to Mr. Fletcher's actual demands, *without* the artificial relevance limitation that she unilaterally imposes.

Lastly, each of Plaintiff's objections are defective and not well-taken. For starters, none of the objections are applicable to Mr. Fletcher's requests, given that they appear to be copy and pasted from responses to *interrogatories*. Similarly, the "Preliminary Statement" also references interrogatories, as well as the Code of Civil Procedure Section 2030.010 (which governs interrogatories). To make matters worse, Plaintiff's objection that Mr. Fletcher's requests are "premature" directly contradicts Code of Civil Procedure 2031.020(a), which expressly states that "a defendant may make a demand for inspection, copying, testing, or sampling without leave of court at any time." This objection is without any merit, especially as Plaintiff herself quoted certain communications in her Complaint. Given that the time has now passed to assert proper objections, Plaintiff must produce all responsive material without limitation.

Given the nature of Plaintiff's allegations, as well as her express reliance on written communications with Mr. Fletcher in her Complaint, it is indisputable that she is deliberately refusing to produce responsive material without justification. Should Plaintiff continue to deny Mr.

Jessica Pride  
July 25, 2023  
Page 3

Fletcher access to these documents after **July 28, 2023**, we will have no choice but to file a Motion to Compel and request sanctions.

Thank you for your attention and please feel free to contact me if you have any questions.

Sincerely,

Sean McKaveney

# EXHIBIT “G”

1 ZACHARY S. SCHUMACHER (SBN 286898)  
2 *zach@schumacher-law.com*  
3 **SCHUMACHER PC**  
4 1901 1st Avenue, First Floor  
5 San Diego, CA 92101  
6 Tel: (619) 344-0800

7 JESSICA K. PRIDE (SBN 249212)  
8 *jpride@pridelawfirm.com*  
9 DANTE T. PRIDE (SBN 262362)  
10 *dpride@pridelawfirm.com*  
11 ZACHARY FREIRE-AVIÑA (SBN 325460)  
12 *zfa@pridelawfirm.com*  
13 **THE PRIDE LAW FIRM**  
14 2831 Camino Del Rio S, Suite 104  
15 San Diego, California 92108  
16 Telephone: 619-516-8166  
17 Facsimile: 619-785-3414

18 Attorneys for Plaintiff,  
19 GRECIA FIGUEROA

20 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
21 **COUNTY OF SAN DIEGO – HALL OF JUSTICE**

22 GRECIA FIGUEROA, an individual,  
23  
24 Plaintiff(s),  
25  
26 v.

27 NATHAN FLETCHER, an individual; SAN  
28 DIEGO METROPOLITAN TRANSIT  
SYSTEM, a California public agency; and  
DOES 1-120, Inclusive,  
Defendant(s).

CASE NO. 37-2023-00012828-CU-OE-CTL

**PLAINTIFF’S OBJECTION TO  
DEFENDANT NATHAN FLETCHER’S  
SUBPOENA OF RECORDS FROM META  
PLATFORMS, INC.**

Judge: Hon. Matthew C. Braner  
Dept. C-60

Complaint Filed: March 28, 2023

**TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

COMES NOW Plaintiff GRECIA FIGUEROA (“Plaintiff”) and objects to Defendant  
NATHAN FLETCHER’s (“Defendant”) subpoena for production of business records from Meta  
Platforms, Inc. (the “Subpoena”), on the following grounds:

1 The Subpoena is vague, ambiguous, unintelligible, and/or overly broad, particularly with  
2 regard to time and scope, and specifically with regard to the undefined term “content” contained  
3 therein. Some categories of documents/information sought in the Subpoena are also not  
4 reasonably calculated to lead to the discovery of admissible evidence. Moreover, some categories  
5 of documents/information sought in the Subpoena, including without limitation, geolocation  
6 information, personally identifiable information, account credentials or passwords, and other  
7 protected information, is protected by Plaintiff’s right to privacy.

8 Plaintiff will file a motion to quash unless the Subpoena is withdrawn and reissued with  
9 the proper definition of the term “content”, as discussed during extensive meet and confer efforts  
10 amongst the parties herein. To this end, Plaintiff invites Defendant’s counsel to further meet and  
11 confer as to these issues if needed to effectuate the withdrawal and reissuance of the Subpoena.

12  
13 DATED: August 2, 2023

**THE PRIDE LAW FIRM**

14  
15  
16 By: 

\_\_\_\_\_  
JESSICA K. PRIDE  
DANTE T. PRIDE  
ZACHARY FREIRE-AVIÑA  
Attorneys for Plaintiff,  
GRECIA FIGUEROA

1 PROOF OF SERVICE

2 I am employed by The Pride Law Firm in the County of San Diego, State of California. I  
3 am over the age of 18 years and not a party to this action. My business address is 2831 Camino  
4 Del Rio South, Suite 104 San Diego, CA 92108. On August 02, 2023, I caused to be served the  
5 following document(s):

6 • **PLAINTIFF’S OBJECTION TO SUBPOENA**

7 on all parties’ registered attorneys of record at:

8 Danielle Hultenius Moore, Esq.  
9 [dmoore@fisherphillips.com](mailto:dmoore@fisherphillips.com)  
10 Stephanie Reynolds, Esq.  
11 [sreynolds@fisherphillips.com](mailto:sreynolds@fisherphillips.com)  
12 Sean L. McKaveney, Esq.  
13 [smckaveney@fisherphillips.com](mailto:smckaveney@fisherphillips.com)  
14 Carola Murguia, Esq.  
15 [cmurguia@fisherphillips.com](mailto:cmurguia@fisherphillips.com)  
16 FISHER & PHILLIPS, LLP  
17 4747 Executive Drive, Suite 1000  
18 San Diego, CA 92121  
19 Attorneys for Defendant Nathan Fletcher

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Facsimile: (619) 330-1701  
Attorneys for Defendant San Diego  
Metropolitan Transit System

20 Titan Legal Services  
21 2050 W. 190<sup>th</sup> Street, Ste. 200  
22 Torrance, CA 90504  
23 [cs@titanlegalservices.com](mailto:cs@titanlegalservices.com)

24 [x] **(BY EMAIL)** I caused such document(s) to be delivered by electronic mail to the email  
25 addresses of the addressee(s): [dmoore@fisherphillips.com](mailto:dmoore@fisherphillips.com); [sreynolds@fisherphillips.com](mailto:sreynolds@fisherphillips.com);  
26 [smckaveney@fisherphillips.com](mailto:smckaveney@fisherphillips.com); [cmurguia@fisherphillips.com](mailto:cmurguia@fisherphillips.com); [jbrown@meyersnave.com](mailto:jbrown@meyersnave.com);  
27 [cphillip@meyersnave.com](mailto:cphillip@meyersnave.com); [ewilliams@meyersnave.com](mailto:ewilliams@meyersnave.com); [cs@titanlegalservices.com](mailto:cs@titanlegalservices.com) (C.C.P. §  
28 1013(g)).

I declare under penalty of perjury under the laws of the State of California that the above  
is true and correct. Executed on August 02, 2023 at San Diego, California.



\_\_\_\_\_  
Arla Clark

