1	Danielle Hultenius Moore (SBN 232480) E-Mail: <u>dmoore@fisherphillips.com</u>	ELECTRONICALLY RECEIVED Superior Court of California, County of San Diego
2	Stephanie Reynolds (SBN 220090) E-Mail: <u>sreynolds@fisherphillips.com</u>	08/10/2023 at 09:03:57 PM
3	Sean L. McKaveney (SBN 331374) E-Mail: <u>smckaveney@fisherphillips.com</u>	Clerk of the Superior Court By Bernabe Montijo,Deputy Clerk
4	FISHER & PHILLIPS LLP 4747 Executive Drive, Suite 1000	by bemabe workijo, bepaty olerk
5	San Diego, California 92121 Telephone: (858) 597-9600	
6	Facsimile: (858) 597-9601	
7	Attorneys for Defendant, Nathan Fletcher	
8		
9	SUPERIOR COURT OF TH	E STATE OF CALIFORNIA
10	FOR THE COUNTY OF SAN DIEGO	- HALL OF JUSTICE COURTHOUSE
11	GRECIA FIGUEROA,	CASE NO.: 37-2023-00012828-CU-OE-CTL [Unlimited Jurisdiction]
12	Plaintiff(s),	Assigned for all purposes to the Honorable
13	V.	Matthew C. Braner, Dept. C-60
14	NATHAN FLETCHER, an individual; SAN	[PROPOSED] ORDER GRANTING
15	DIEGO METROPOLITAN TRANSIT SYSTEM, a California public agency; and,	DEFENDANT NATHAN FLETCHER'S MOTION TO COMPEL PLAINTIFF'S DESDONSE TO DECUEST FOD
16	DOES 1-20, Inclusive, Defendant(s).	RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE
17		DATE: October 27, 2023
18		TIME: 9:00 a.m.
19		Complaint Filed: March 28, 2023 Trial Date: Not Set
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	[PROPOSED] ORDER GRANTING DEFENDANT PLAINTIFF'S RESPONSE TO REQUEST FOR	NATHAN FLETCHER'S MOTION TO COMPEL
	FP 47915489.1	

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8	SUPERIOR COURT OF THE STATE OF CALIFORNIA		
9	FOR THE COUNTY OF SAN DIEGO - HALL OF JUSTICE COURTHOUSE		
10	GRECIA FIGUEROA,	CASE NO.: 37-2023-00012828-CU-OE-CTL [Unlimited Jurisdiction]	
11	Plaintiff(s),	Assigned for all purposes to the Honorable Matthew C. Braner, Dept. C-60	
12 13	v. NATHAN FLETCHER, an individual; SAN	[PROPOSED] ORDER GRANTING	
13	DIEGO METROPOLITAN TRANSIT SYSTEM, a California public agency; and,	DEFENDANT NATHAN FLETCHER'S MOTION TO COMPEL PLAINTIFF'S	
15	DOES 1-20, Inclusive, Defendant(s).	RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE	
16		DATE: October 27, 2023	
17		TIME: 9:00 a.m.	
18		Complaint Filed: March 28, 2023 Trial Date: Not Set	
19 20	Defendant Nathan Fletcher's ("Defenda	ant") motion for an order compelling Plaintiff	
21	Grecia Figueroa ("Plaintiff") to provide substar	ntive responses and all responsive documents to	
22	Defendant's Request for Production of Documents, Set One came on regularly for hearing on		
23	October 27, 2023 at 9:00 a.m. before the Honorable Matthew C. Braner, or as soon thereafter as		
24	it may be heard. Appearances are noted on the record.		
25	After considering the moving papers, the opposition papers, arguments of counsel, the		
26	entire record, and all other matters presented to the Court, the Court GRANTS the Motion to		
27	Compel, and orders as follows:		
28	///		
	I [PROPOSED] ORDER GRANTING DEFENDANT NATHAN FLETCHER'S MOTION TO COMPEL PLAINTIFF'S RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE FP 47915489.1		

1	1.	Defendant's Motion to Compel Further Responses to Request for Production of
2	Documents,	Set One is granted.

3 2. Within 3 calendar days of this Order, Plaintiff shall comply with her verified
4 Responses to Defendant's Request for Production of Documents, Set One and produce all
5 responsive documents that in her possession, custody, and control.

3. Defendant's request for sanctions against Plaintiff and her counsel of record,
jointly and severally, in the amount of \$10,720.00 is GRANTED. Plaintiff and her counsel of
record shall provide Defendant with a check in the amount of \$10,720.00 within ten (10) calendar
days.

The Court further rules as follows: **IT IS SO ORDERED.** Dated: , 2023 Hon. Matthew C. Braner JUDGE OF THE SUPERIOR COURT [PROPOSED] ORDER GRANTING DEFENDANT NATHAN FLETCHER'S MOTION TO COMPEL PLAINTIFF'S RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE FP 47915489.1

1		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 n the County of San Diego with the law offices of Fisher & Phillips LLP and its business address s 4747 Executive Drive, Suite 1000, San Diego, California, 92121.		
2 3	in the County of San Diego with the law offices o			
4 5 6 7	On August 10, 2023, I served the following document(s) [PROPOSED] ORDER GRANTING DEFENDANT NATHAN FLETCHER'S MOTION TO COMPEL PLAINTIFF'S RESPONSE TO REQUEST FOR PRODUCTION OF DOCUMENTS, SET ONE on the person(s) listed below by placing a true copy thereof enclosed in sealed envelope(s) addressed as follows:			
8 9	Zachary S. Schumacher (SBN 286898) SCHUMACHER PC 1901 1st Avenue, First Floor San Diego, California 92101	E: <u>zach@schumacher-law.com</u> T: 619-344-0800 <i>Co-Counsel for Plaintiff, Grecia Figueroa</i>		
9 10 11 12 13 14	Jessica K. Pride (SBN 249212) Dante T. Pride (SBN 262362) Zachary Freire-Aviña (SBN 325460) THE PRIDE LAW FIRM 2831 Camino del Rio South, Suite 104 San Diego, California 92108	E: jpride@pridelawfirm.com E: dpride@pridelawfirm.com E: zfa@pridelawfirm.com CC: swhite@pridelawfirm.com aclark@pridelawfirm.com; borozco@pridelawfirm.com T: 619-516-8166 F: 619-785-3414 Co-Counsel for Plaintiff, Grecia Figueroa		
15 16 17 18 19 20	Janice P. Brown (SBN 114433) Corrin M. Phillip (SBN 310353) Kelsie E. Russell (SBN 346629) MEYERS NAVE RIBACK SILVER & WILSON 600 B Street, Suite 1650 San Diego, California 92101	E: jbrown@meyersnave.com E: cphillip@meyersnave.com E: krussell@meyersnave.com CC: ewilliams@meyersnave.com T: 619-330-1700 F: 619-330-1701 Counsel for Defendant, San Diego Metropolitan Transit System		
21 22	[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.			
23 24	I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct. Executed August 10, 2023, at San Diego, California.			
25 26	Amanda Funkhouser By: <u>Amanda Ture</u>			
27 28				
	PROOF OF SERVICE			
	FP 47915489.1			