

7/16/2025 7:32:55 PM

Steven W. Blake, Esq., SBN 235502  
Andrew E. Hall, Esq., SBN 257547

**BLAKE LAW FIRM**

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Email: andrew@blakelawca.com

Attorney for Defendant  
STEPHEN LAKE

Clerk of the Superior Court  
By T. Automation ,Deputy Clerk

**SUPERIOR COURT OF CALIFORNIA**

**COUNTY OF SAN DIEGO, HALL OF JUSTICE**

AMY SHERLOCK, an individual and on  
behalf of her minor children, T.S. and S.S.,  
ANDREW FLORES, an individual;

Plaintiffs,

vs.

GINA M. AUSTIN, an individual; AUSTIN  
LEGALGROUP, a professional corporation,  
LARRY GERACI, an individual, REBECCA  
BERRY, an individual; JESSICA  
MCELFRESH, an individual; SALAM  
RAZUKI, an individual; NINUS MALAN, an  
individual; FINCH, THORTON, AND  
BARID, a limited liability partnership;  
ABHAY SCHWEITZER, an individual and  
dba TECHNE; JAMES (AKA JIM)  
BARTELL, an individual; NATALIE  
TRANG-MY NGUYEN, an individual,  
AARON MAGAGNA, an individual;  
BRADFORD HARCOURT, an individual;  
SHAWN MILLER, an individual; LOGAN  
STELLMACHER, an individual;  
EULENTIAS DUANE ALEXANDER, an  
individual; STEPHEN LAKE, an individual,  
ALLIED SPECTRUM, INC., a California  
corporation, PRODIGIOUS COLLECTIVES,  
LLC, a limited liability company, and DOES 1  
through 50, inclusive,

Defendants.

CASE NO.: **37-2021-0050889-CU-AT-CTL**

**DECLARATION OF ANDREW HALL IN  
SUPPORT OF OPPOSITION TO  
MOTION FOR LEAVE TO FILE  
SECOND AMENDED COMPLAINT**

**Hearing Date: July 18, 2023**  
**Hearing Time: 9:00 a.m.**

Case Filed: December 3, 2021  
Department: C-73  
Judge: Hon. James Mangione  
Trial Date: N/A

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5. Despite requesting a copy on February 7, I was never provided with a copy of the proposed pleading in advance of filing of the motion for leave to amend. The first time I was provided with a copy of the proposed pleading was in conjunction with the motion for leave to amend.

6. I was traveling with family in Europe from June 26 to July 13 with limited access to my emails. Despite the hearing date having been reserved in February 2025 – at the latest – the motion was not filed until – at the earliest – June 26, which was just 15 court days prior to the July 18 hearing. I did not have an opportunity to review the motion until I returned to the office, which was after the deadline to file any opposition.

California that the foregoing matters are true and correct and based in my personal knowledge and, if called upon to testify, I would and could testify truthfully to these matters. Executed on July 16, 2025, in Carlsbad, California.



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ANDREW HALL

# ***EXHIBIT 1***



Andrew Hall <andrew@blakelawca.com>

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## Sherlock v. Austin, et al

1 message

---

**Andrew Hall** <andrew@blakelawca.com>

Fri, Feb 7, 2025 at 9:31 AM

To: Andrew Flores <afloreslaw@gmail.com>

Cc: Steve Blake <steve@blakelawca.com>, Christa Schnick <christa@blakelawca.com>, Blake Law Firm <eservice@blakelawca.com>

Mr. Flores,

There has been an issue with you habitually failing to serve us with pleadings, the latest being yesterday's filing which I only discovered by inspecting the docket. Another example was the Application for Publication filed on October 11 that, for some reason, was not served on us until December. There have been other instances over the years.

I would request that we be served with any filings, including the filing from yesterday, and going forward please include myself and the 3 emails cc'd on this email on any service of process. Should you continue to fail to serve us, I will have no choice but to bring this to the attention of the court as it has the potential to substantially prejudice my client.

On a related note, I see that a motion to amend the complaint is set for July. We have had no communications regarding a potential amendment and I have not seen any proposed amended pleading; nevertheless, I am open to reviewing any proposed pleading to see if we can avoid the necessity of a hearing.

**Andrew E. Hall, Esq.**

**Senior Counsel**

Blake Law Firm

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# ***EXHIBIT 2***



Andrew Hall <andrew@blakelawca.com>

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**Re: Sherlock v. Austin, et al**

1 message

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**Andrew Flores** <afloreslaw@gmail.com>

Fri, Feb 7, 2025 at 9:53 AM

To: Andrew Hall <andrew@blakelawca.com>

Cc: Steve Blake <steve@blakelawca.com>, Christa Schnick <christa@blakelawca.com>, Blake Law Firm <eservice@blakelawca.com>

Hello Mr. Hall,

My sincere apologies, I have been filing using onelegal and there is a long list of individuals that are preset for service. I was under the impression that you were also on that list. I do show that service was sent to Mr. Blake and a Nancy Fabian from your office. I will update it now and make sure you get everything that is filed from here on out. As far as the other filings I have attached them to this email. I will note that the request for involuntary dismissal is still pending in the que despite it being filed on January 24. I did provide the court a courtesy copy. Again my sincere apologies I will make sure this does not happen moving forward.

As for the amended complaint request, I have not yet filed anything in that regard. I have simply reserved the date. Once I have completed it I will provide you a copy in advance of filing for your review.

Sincerely,

On Fri, Feb 7, 2025 at 9:31 AM Andrew Hall <andrew@blakelawca.com> wrote:

Mr. Flores,

There has been an issue with you habitually failing to serve us with pleadings, the latest being yesterday's filing which I only discovered by inspecting the docket. Another example was the Application for Publication filed on October 11 that, for some reason, was not served on us until December. There have been other instances over the years.

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On a related note, I see that a motion to amend the complaint is set for July. We have had no communications regarding a potential amendment and I have not seen any proposed amended pleading; nevertheless, I am open to reviewing any proposed pleading to see if we can avoid the necessity of a hearing.

**Andrew E. Hall, Esq.**

**Senior Counsel**

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--

Andrew Flores

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**4 attachments**



**Sherlock Flores Dec .pdf**  
115K



**Sherlock Involuntary Dismissal (1).pdf**  
147K



**Sherlock OSC Response (1).pdf**  
596K



**Sherlock Flores Dec (1).pdf**  
2259K