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Point Loma Patients Consumer Cooperative,  
7 Golden State Greens, LLC, Far West Management, LLC  
Far West Operating, LLC, and Far West Staffing, LLC

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**DART LAW**

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12 Attorneys for Defendants 419 Consulting,  
Adam Knopf, and Justus Henkes IV

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
14 **COUNTY OF SAN DIEGO**

15  
16 KARL BECK, individually and on behalf  
17 of all other similarly situated California  
residents,

18 Plaintiff,

19 vs.

20 POINT LOMA PATIENTS CONSUMER  
21 COOPERATIVE CORPORATION, a  
California corporation, ADAM KNOPF, an  
22 individual, JUSTUS H. HENKES IV, an  
individual, 419 CONSULTING INC, a  
23 California corporation, GOLDEN STATE  
GREENS LLC, a California LLC, FAR  
24 WEST MANAGEMENT LLC, a  
California LLC, FAR WEST  
25 OPERATING, LLC, a California LLC,  
FAR WEST STAFFING LLC, a California  
26 LLC, and DOES 1-50;

27 Defendants.  
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**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego

**07/20/2018** at 01:15:00 PM

Clerk of the Superior Court  
By Jessica Pascual, Deputy Clerk

**CASE NO. 37-2017-00037524-CU-BT-CTL**

**DEFENDANTS' JOINT NOTICE OF  
MOTION AND MOTION TO QUASH  
DEPOSITION SUBPOENA FOR  
PRODUCTION OF BUSINESS RECORDS  
TO VLADIMIR DRABKIN DBA 420SOFT**

Judge: Hon. Joel Wohlfeil  
Dept.: 73  
Date: August 24, 2018  
Time: 9:00 a.m.

Complaint Filed: October 6, 2017  
Trial Date: March 1, 2019

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TO PLAINTIFF KARL BECK AND HIS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on August 24, 2018 at 9:00 a.m., or as soon thereafter as the matter may be heard, in Department 73 of the San Diego County Superior Court located at 330 West Broadway, San Diego, California 92101, defendants Point Loma Patients Consumer Cooperative Corporation (“PLPCC”), Adam Knopf, Justus H. Henkes IV, 419 Consulting, Inc., Golden State Greens LLC, Far West Management LLC, Far West Operating LLC, and Far West Staffing LLC (“Defendants”) will, and hereby do, move for an order quashing plaintiff Karl Beck’s Deposition Subpoena for Production of Business Records to Vladimir Drabkin dba 420 Soft (“Subpoena”) pursuant to Code of Civil Procedure section 1987.1 on the grounds that the Subpoena is grossly overbroad, calls for information neither relevant nor reasonably calculated to lead to the discovery of admissible evidence, is not reasonably calculated to lead to the discovery of admissible evidence, is improper pre-class certification discovery, and invades Defendants’ privacy rights.

This motion will be based on this Notice of Motion and Motion, the Memorandum Of Points & Authorities, the declaration of Tamara Leetham, the declaration of Adam Knopf, the papers and records on file herein, those matters of which the Court must or may take judicial notice, and such other and further evidence as may be presented at the time of the hearing.

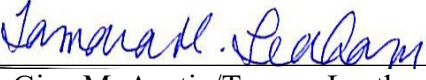
Dated: July 20, 2018

DART LAW

By   
MATTHEW B. DART  
Attorney for Defendants 419 Consulting, Inc., Adam Knopf and Justus Henkes

Dated: July 20, 2018

AUSTIN LEGAL GROUP, APC

By:   
Gina M. Austin/Tamara Leetham,  
Attorneys for Point Loma Patients Consumer Cooperative Corporation, Golden State Greens, LLC, Far West Management, LLC, Far West Operating, LLC, and Far West Staffing, LLC