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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

8 MATTHEW B. DART (Bar No. 216429)

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.
28

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

12/08/2017 at 03:25:00 PM

Clerk of the Superior Court
By Jessica Pascual, Deputy Clerk

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

**DEFENDANTS' JOINT NOTICE OF
DEMURRER AND DEMURRER TO
COMPLAINT**

Judge: Hon. Joel Wohlfeil
Dept.: 73
Date: January 19, 2018
Time: 9:00 a.m.

Complaint Filed: October 6, 2017
Trial Date: Not Set

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TO PLAINTIFF KARL BECK AND HIS ATTORNEYS OF RECORD:


PLEASE TAKE NOTICE that on January 19, 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, 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, demur to plaintiff Karl Beck’s (“Plaintiff”) Complaint.

Defendants demur to Plaintiff’s Complaint pursuant to Code of Civil Procedure sections 430.10(e) and (f) on the grounds that the causes of action are uncertain, ambiguous and unintelligible, and fail to state a cause of action against Defendants.

The demurrer will be based on this Notice of Demurrer and Demurrer, the Memorandum Of Points & Authorities, the Request for Judicial Notice, and the Declaration of Matthew Dart filed and served concurrently herewith, 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.

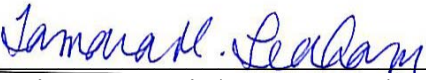
Dated: December 7, 2017

DART LAW

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

Dated: December 7, 2017

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

1 **DEMURRER TO COMPLAINT**

2 Defendants hereby demur to the Complaint of plaintiff Karl Beck on the following
3 grounds:

4 **1. Second Cause Of Action For Violation of the UCL:**

5 The second cause of action for violation of the UCL fails to state facts sufficient to
6 constitute a cause of action against Defendants, and is uncertain. (Code Civ. Proc. § 430.10(e),
7 (f).)

8 **2. Third Cause Of Action For Violation of the CLRA**

9 The third cause of action for violation of the CLRA fails to state facts sufficient to
10 constitute a cause of action against Defendants, and is uncertain. (Code Civ. Proc. § 430.10(e),
11 (f).)

12 **3. Fourth Cause Of Action For Conversion**


13 The fourth cause of action for conversion fails to state facts sufficient to constitute a cause
14 of action against Defendants, and is uncertain. (Code Civ. Proc. § 430.10(e), (f).)

15 **4. Fifth Cause Of Action For Unjust Enrichment:**

16 The fifth cause of action for unjust enrichment is not a recognized cause of action in
17 California, fails to state facts sufficient to constitute a cause of action against Defendants, and is
18 uncertain. (Code Civ. Proc. § 430.10(e), (f).)

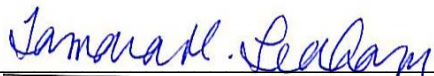
19 Dated: December 7, 2017

20 DART LAW

21 By 
22 _____
23 MATTHEW B. DART
24 Attorney for Defendants 419 Consulting,
25 Inc., Adam Knopf and Justus Henkes

26 Dated: December 7, 2017

AUSTIN LEGAL GROUP, APC

27 By: 
28 _____
29 Tamara Leatham Attorney for Point Loma
30 Patients Consumer Cooperative, Golden
31 State Greens, Far West Management, Far
32 West Operating, and Far West Staffing