

1 THE RESTIS LAW FIRM, P.C.
2 William R. Restis, Esq. (SBN 246823)
3 550 West C Street, Suite 1760
4 San Diego, California 92101
5 +1.619.270.8383
6 +1.619.752.1552
7 william@restislaw.com

8 *Attorneys for Plaintiff*

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
02/15/2018 at 02:10:00 PM
Clerk of the Superior Court
By Rhonda Babers, Deputy Clerk

9
10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
11 **COUNTY OF SAN DIEGO**

12 **KARL BECK**, individually and on behalf of all
13 other similarly situated California residents,

14 Plaintiff,

15 v.

16 **POINT LOMA PATIENTS**
17 **CONSUMER COOPERATIVE**
18 **CORPORATION**, A California
19 Corporation, **ADAM KNOFF**, an
20 Individual, **JUSTUS H. HENKES IV**, an
21 Individual, **419 CONSULTING INC.**, a
22 California Corporation, **GOLDEN**
23 **STATE GREENS LLC**, a California
24 LLC, **FAR WEST MANAGEMENT,**
25 **LLC**, a California LLC, **FAR WEST**
26 **OPERATING, LLC**, a California LLC,
27 **FAR WEST STAFFING, LLC**, a
28 California LLC, and **DOES 1-50**,

Defendants.

Case No: 37-2017-00037524-CU-BT-CTL

CLASS ACTION

**DECLARATION OF WILLIAM R. RESTIS
IN SUPPORT OF PLAINTIFF'S MOTION
TO COMPEL PRODUCTION OF
PUTATIVE CLASS MEMBER LIST AND
APPROVE OPT-OUT NOTICE**

Date: March 23, 2018

Time: 9:00 a.m.

Judge: Hon. Joel R. Wohlfeil

Ctrm: C-73

1 I, William R. Restis, hereby declare as follows:

2 1. I am over 18 and the managing member of The Restis Law Firm, P.C. I have personal
3 knowledge of the matters set forth herein, based on my active participation in all material aspects of
4 this litigation. If called upon, I could and would testify competently to the facts herein based upon
5 my personal involvement in this case. I submit this declaration in support of Plaintiff Karl Beck's
6 ("Plaintiff") Motion to Compel Production of Class Member List.

7 2. Attached hereto as **Exhibit A** is a true and correct copy of relevant portions of
8 Plaintiff's Request for Production of Documents (Set One) to Point Loma Patients Consumer
9 Cooperative Corporation ("PLPCC"), served on December 1, 2017.¹

10 3. Attached hereto as **Exhibit B** is a true and correct copy of Defendant PLPCC's
11 Response to Request for Production of Documents (Set One), Request No. 1 Only, served on January
12 5, 2018.

13 4. Attached hereto as **Exhibit C** is a true and correct copy of a February 1, 2018 meet
14 and confer letter from me to PLPCC counsel Tamara Leetham regarding the intended scope of
15 Request No. 1 to the PLPCC.

16 5. Attached hereto as **Exhibit D** is a true and correct copy of Plaintiff's proposed Notice
17 to putative class members.

18 6. Attached hereto as **Exhibit E** is a true and correct copy of an email dated September
19 20, 2018 from PLPCC counsel Gina Austin stating Plaintiff was purportedly "banned from the
20 facility due to his inappropriate and harassing behavior towards other members within 30 days of
21 becoming a member."

22 7. Attached hereto as **Exhibit F** is a true and correct copy of my December 6, 2017 meet
23 and confer letter to Ms. Leetham discussing Plaintiff's entitlement to contact information regarding
24 putative class members.

25
26 ¹ The PLPCC requested, and Plaintiff granted, an extension of time to respond to Plaintiff's first
27 set of production demands, except Request No 1.

EXHIBIT A

1 THE RESTIS LAW FIRM, P.C.
2 William R. Restis, Esq. (SBN 246823)
3 550 West C Street, Suite 1760
4 San Diego, California 92101
5 Tel: +1.619.270.8383
6 Fax: +1.619.752.1552
7 william@restislaw.com

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
11 **COUNTY OF SAN DIEGO**

12 **KARL BECK**, individually and on behalf of all
13 other similarly situated California residents,

14 Plaintiff,

15 v.

16 **POINT LOMA PATIENTS CONSUMER**
17 **COOPERATIVE CORPORATION**, A
18 California Corporation, **ADAM KNOPF**, an
19 Individual, **JUSTUS H. HENKES IV**, an
20 Individual, **419 CONSULTING INC.**, a
21 California Corporation, **GOLDEN STATE**
22 **GREENS LLC**, a California LLC, **FAR WEST**
23 **MANAGEMENT, LLC**, a California LLC,
24 **FAR WEST OPERATING, LLC**, a California
25 LLC, **FAR WEST STAFFING, LLC**, a
26 California LLC, and **DOES 1-50**,

27 Defendants.

Case No. 37-2017-00037524-CU-BT-CTL

PLAINTIFF'S REQUEST FOR PRODUCTION
OF DOCUMENTS (SET ONE) TO POINT
LOMA PATIENTS CONSUMER
COOPERATIVE CORPORATION

[Code Civ. Pro. §§2031.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK
2 RESPONDING PARTY: Defendant POINT LOMA PATIENTS CONSUMER
3 COOPERATIVE CORPORATION
4 SET NUMBER: ONE (1)

5 Pursuant to Code of Civil Procedure §2031.010, Plaintiff hereby propounds Request for
6 Production of Documents (Set One) to Defendant Point Loma Patients Consumer Cooperative
7 Corporation, which shall answer the following requests, separately, fully and under oath, and in the
8 manner provided by the California Code of Civil Procedure and the terms set forth herein. The
9 documents requested herein include those documents in your possession, custody and/or control
10 and shall be produced for inspection and copying by Plaintiff’s counsel as those documents are kept
11 in the normal course of business at the location(s) where the documents responsive to these
12 Requests are kept, or at such other time or place or manner as the parties mutually agree in writing.

13 **I. INSTRUCTIONS**

14 In answering this discovery, you are required to produce all DOCUMENTS and DATA
15 responsive to these Requests below in your possession, custody or control or in the possession,
16 custody or control of your officers, employees, agents, representatives or attorneys. A
17 DOCUMENT or DATA is in your control if you have the right to obtain it from another person.

18 In interpreting this discovery, any word, words or language objected to as being “vague” or
19 “ambiguous” shall be defined in accordance with the definitions herein and alternatively, if such
20 word(s) are “vague” or “ambiguous” to you, the words shall be interpreted as defined in a standard
21 edition of Webster’s Dictionary. In each instance, state the objection and the corresponding
22 definition which you are applying.

23 If any DOCUMENT or DATA responsive to these Requests was at any time in your
24 possession or custody or subject to your control but now is no longer available for production, state
25 in writing whether the DOCUMENT or DATA:

- 26 (a) is missing or lost;

- 1 (b) has been destroyed;
- 2 (c) has been transferred or delivered to another person or entity and at whose request;
- 3 (d) has been otherwise disposed of; and
- 4 (e) in each instance, explain the circumstances surrounding the disposition of the
- 5 DOCUMENT or DATA and provide the date or approximate date of the DOCUMENT or DATA's
- 6 disposition.

7 If you claim that any DOCUMENT or DATA responsive to any of these Requests is

8 privileged or protected and you withhold a DOCUMENT or DATA or any portion of a

9 DOCUMENT or DATA on that basis, you must expressly make the claim and support the claim by

10 a description of the nature of the DOCUMENT or DATA, communications, or things not produced

11 that is sufficient to enable Plaintiff's counsel to evaluate and/or contest your claim. You are

12 requested to provide in writing with respect to each DOCUMENT or DATA to which you claim a

13 privilege applies, a full description of the claimed basis for the asserted privilege, including the

14 following information:

- 15 (a) the nature of the privilege you claim (i.e., attorney-client, work product);
- 16 (b) on whose behalf you are asserting the privilege;
- 17 (c) the facts upon which you rely as the basis for claiming the privilege;
- 18 (d) the title (if any) and the general subject matter of the DOCUMENT or DATA;
- 19 (e) the identity of each person who prepared or authored the DOCUMENT or DATA;
- 20 (f) the date the DOCUMENT or DATA was prepared and/or transmitted;
- 21 (g) the identity of each person (if any) who signed the DOCUMENT or DATA;
- 22 (h) the identity of each person to whom the DOCUMENT or DATA was directed,
- 23 circulated or shown;
- 24 (i) the identity of each person who has reviewed or seen the DOCUMENT or DATA;
- 25 and
- 26 (j) the identity of each person now in possession of the DOCUMENT or DATA.
- 27

1 If any portion of a DOCUMENT is responsive to any Request, then the entire DOCUMENT
2 must be produced. If the DOCUMENT contains privileged material, produce the entire
3 DOCUMENT with the privileged material redacted, the fact of redaction so indicated, and the basis
4 of the privilege asserted in your response.

5 If two or more identical duplicate copies of a DOCUMENT exist, the most legible copy
6 should be produced for purposes of these Requests.

7 Any DOCUMENT with any marks on any sheet or side thereof, including without
8 limitation, any initials, stamped indicia, comment or notation of any character, not a part of the
9 original text, or any reproduction thereof, is to be considered a separate DOCUMENT for purposes
10 of responding to any Request.

11 Responsive DOCUMENTS or DATA shall be produced in the manner in which they were
12 kept in the ordinary course of business. Responsive DOCUMENTS shall not be shuffled or
13 otherwise rearranged. DOCUMENTS that in their original condition are stapled, clipped, or
14 otherwise fastened together shall be produced in such form. If a DOCUMENT or group of
15 DOCUMENTS is taken from a file folder, file drawer, file box or notebook for transportation to a
16 central location for Plaintiff's review, please include a copy of the label from such container of the
17 DOCUMENTS.

18 Responsive DOCUMENTS or DATA shall be produced at the location as aforementioned in
19 a manner which is responsive to a particular Request. Upon producing the requested
20 DOCUMENTS or DATA, identify the Request(s) to which any DOCUMENT or DATA or group
21 of DOCUMENTS is responsive.

22 Upon producing the requested DOCUMENTS, you may mark the lower right-hand corner
23 of each page with Bates-stamped, consecutive numbers. Please do not allow the marks to obscure
24 any information on the DOCUMENT.

25 If there are no responsive DOCUMENTS or DATA with respect to a particular request or
26 part thereof please state so in writing.

1 **II. DEFINITIONS**

2 The following definitions apply to each of the requests for documents set forth herein and
3 are deemed to be incorporated in each said request:

4 “ACTION” means *Beck v. Point Loma Patients Consumer Cooperative Corporation et al.*,
5 Case Number 37-2017-00037524-CU-BT-CTL.

6 “COMMUNICATIONS” and words derivative means the act of communicating, including
7 every manner or means of disclosure, transfer, or exchange of information (in the form of facts,
8 ideas, inquiries, or otherwise), whether by document, facsimile, mail, personal delivery,
9 electronically or otherwise.

10 “COMPUTER” means all devices utilizing microchips to facilitate processing, analysis, or
11 storage of electronic information, including but not limited to desktop computers, laptop computers,
12 tablet computers, smartphones, notebook computers, smart watches, and palmtop computers (also
13 known as personal digital assistants or PDA’s).

14 “DOCUMENT(S)” is defined in the manner described by California Evidence Code § 250,
15 and is used in the broadest possible sense to include all tangible items where information is stored
16 or likely to be stored, including information or DATA recorded in any medium, whether written,
17 printed, typed, photostatic, photographed, recorded, stored on a COMPUTER or other electronic
18 form, whether comprised of letters, numbers, graphics, sound or video, whether in original, draft,
19 revision, or non-identical format (i.e., whether different from another document by reason of the
20 time of its creation, whether contemporaneously or subsequently created, or whether different from
21 another document by reason of the notations, marks or other unique characteristics), whether a
22 translation, dictation or reference to an event, whether by handwriting, typewriting, or mimeograph,
23 whether in hard document, recorded or computer R form, including COMPUTER printouts and
24 computer DATA or files, including DATA stored on ZIP or USB drives, external or internal hard
25 drives, compact discs, or other COMPUTER storage devices of any form whatsoever, and including
26 but not limited to all electronic mail (e-mail) and any instant messenger, Slack (type) channel or
27

1 similar, and including any DATA, writings, correspondence, letters, agreements, contracts,
2 memoranda, reports, calendars, date books, checks, invoices, billing statement, notebooks, notes,
3 journals, accountings, ledgers, presentations, manuals, publications, brochures, designs, proposals,
4 and whether privileged or otherwise excluded from discovery.

5 “ELECTRONIC DATA” or “DATA” means the original (or identical duplicate when the
6 original is not available), and any non-identical copies (whether non-identical because of notes
7 made on copies or attached comments, annotations, marks, transmission notations, or highlighting
8 of any kind) of DOCUMENTS of every kind and description whether inscribed by mechanical,
9 facsimile, electronic, magnetic, digital, analogy, or other means. ELECTRONIC DATA and
10 DATA includes, by way of example only, computer programs (whether private, commercial, or
11 work-in-progress), programming notes or instructions, activity listings of electronic mail
12 transmittals and/or receipts, output resulting from the use of any software program, including work
13 processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail,
14 operating systems, sources code of all types, peripheral drivers, portable document format (PDF)
15 files, batch files, ASCII files, and any and all miscellaneous files and/or file fragments, regardless
16 of the media on which they reside and regardless of whether said electronic data consists in an
17 active file, deleted file, or file fragment. ELECTRONIC DATA and DATA also include any and
18 all items stored on computer memories, hard drives, CD-ROMs, CD-R, CD-RW, DVD, Blu-ray, M-
19 Disc, removable media such as Zip disks, flash memory, USB drives, and their equivalent,
20 computer chips, including, but not limited to EDROM, PROM, RAM and ROM, on or in any other
21 vehicle for digital data storage and/or transmittal, including cloud or remote storage such as
22 Dropbox, Google Drive, OneDrive, iCloud, Evernote, and similar. The term ELECTRONIC
23 DATA and DATA also include the file, folder tabs and/or containers and labels appended to, or
24 associated with, any physical storage device associated with each original and/or copy.

25 “MEDICAL MARIJUANA” means cannabis or marijuana, and any derivative or product
26 derived therefrom, including any product containing tetrahydrocannabinol (THC) or cannabidiol
27

1 (CBD), including but not limited to, cannabis flowers, cannabis infused edibles and beverages, hash
2 oil, tinctures, concentrates, cartridges and topical cannabis such as creams, ointments, and patches.

3 “REFER(S)/(ING)” means to have as a subject of a DOCUMENT or ELECTRONIC
4 DATA the nature of the matter requested or to otherwise identify, analyze or concern the matter
5 requested. To be responsive, the subject matter of the DOCUMENT or ELECTRONIC DATA
6 requested need not be the exclusive subject, but rather, concerning the information requested.

7 “RELATE(S)/(ING)” means, without limitation, identifying, describing, discussing,
8 assessing, stating, reflecting, concerning, constituting, containing, embodying, or evidencing in any
9 way, whether directly or indirectly, the particular subject matter identified.

10 “YOU”, “YOUR,” and “PLPCCC” mean Defendant Point Loma Patients Consumer
11 Cooperative Corporation, the responding party to whom this discovery is directed, and includes any
12 present or former company that YOU have acquired, and any local, regional, national, and
13 executive offices, divisions, or subsidiaries, and all present and former directors, officers, partners,
14 executive personnel, managers, agents or employees, including their accountants, attorneys, bankers
15 and advisors acting or purporting to act on the entity’s behalf.

16 **III. RULES OF CONSTRUCTION**

17 The following rules of construction shall apply:

- 18 1. The use of the singular form of any word shall be deemed to include the plural and
19 vice versa;
- 20 2. The use of the present tense includes the past tense and vice versa;
- 21 3. The terms “any,” “all,” “each” and “every” should be understood in either their
22 most or least inclusive sense as necessary to bring within the scope of the discovery request all
23 responses that might otherwise be construed to be outside of their scope, and the term “any” is
24 particularly defined to mean each and every.
- 25 4. The use of one gender shall include all others, including masculine, feminine and
26 neutral genders, as appropriate in the context; and

1 5. The connections “and” and “or” shall be construed either disjunctively or conjunctively as
2 necessary to bring within the scope of the discovery request all responses that might otherwise be
3 construed to be outside their scope.

4 **IV. RELEVANT TIME PERIOD**

5 The Relevant Time Period is the period June 2014 to present, unless otherwise specifically
6 indicated, and shall include all information that relate to such period even though prepared,
7 published or disseminated outside of such time period.

8 **V. REQUESTS FOR PRODUCTION**

9 REQUEST NO. 1:

10 An export list containing the names and addresses of all members of the PLPCCC since
11 January 1, 2015.

12 REQUEST NO. 2:

13 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
14 that REFER or RELATE to Sinner Brothers, Inc. and/or Justus H. Henkes IV, Inc.

15 REQUEST NO. 3:

16 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
17 that REFER or RELATE to YOUR Articles of Incorporation and amendments thereto, all bylaws
18 and amendments thereto, and all meeting minutes.

19 REQUEST NO. 4:

20 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
21 that REFER or RELATE to any contracts or agreements, formal or informal, between or among
22 YOU and any defendant in this ACTION.

23 REQUEST NO. 5:

24 All COMMUNICATIONS with, including, by or between, any defendant in this ACTION.
25
26
27

1 REQUEST NO. 6:

2 All COMMUNICATIONS with, including, by or between, any natural or legal person
3 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport, distribution,
4 sale, purchase, and/or financing of MEDICAL MARIJUANA.

5 REQUEST NO. 7:

6 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
7 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for, cash.
8
9
10
11

12 DATED: December 1, 2017

Respectfully submitted,

13 THE RESTIS LAW FIRM, P.C.

14
15 
16 William Restis, Esq.
17 550 West C Street, Suite 1760
18 San Diego, CA 92101
19 Tel: +1.619.270.8383
20 Email: william@restislaw.com
21 ATTORNEYS FOR PLAINTIFFS

22 FINKELSTEIN & KRINSK LLP
23 Jeffrey R. Krinsk, Esq. (SBN 109234)
24 jrk@classactionlaw.com
25 550 West C St., Suite 1760
26 San Diego, California 92101
27 Telephone: (619) 238-1333
28 Facsimile: (619) 238-5425

EXHIBIT B

AUSTIN LEGAL GROUP, APC
3990 Old Town Ave, Ste A-112
San Diego, CA 92110

1 Gina M. Austin (SBN 246833)
E-mail: gaustin@austinlegalgroup.com
2 Tamara M. Leetham (SBN 234419)
E-mail: tamara@austinlegalgroup.com
3 AUSTIN LEGAL GROUP, APC
3990 Old Town Ave, Ste A-112
4 San Diego, CA 92110
Phone: (619) 924-9600
5 Facsimile: (619) 881-0045

6 Attorneys for Defendants Point Loma Patients
7 Consumer Cooperative, Golden State Greens,
Far West Operating, Far West Management, Far
8 West Staffing

9 **SUPERIOR COURT OF CALIFORNIA**
10 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**

12 KARL BECK, individually and on behalf
13 of all similarly situated California
residents,

14 Plaintiff,

15 v.

16 POINT LOMA PATIENTS CONSUMER
17 COOPERATIVE CORPORATION, A
California Corporation, ADAM KNOPF,
18 an Individual, JUSTUS H. HENKES IV, an
Individual, 419 CONSULTING INC., a
19 California Corporation, GOLDEN STATE
GREENS LLC, a California LLC, FAR
20 WEST MANAGEMENT, LLC, a
California LLC, FAR WEST
21 OPERATING, LLC, a California LLC,
FAR WEST STAFFING, LLC, a
22 California LLC, and DOES 1 through 50,
inclusive.

23 Defendants.

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

**DEFENDANT POINT LOMA PATIENTS
CONSUMER COOPERATIVE
CORPORATION RESPONSE TO
REQUEST FOR PRODUCTION OF
DOCUMENTS (SET ONE), REQUEST NO.
1 ONLY**

25 **PROPOUNDING PARTY:** Plaintiff KARL BECK

26 **RESPONDING PARTY:** Defendant POINT LOMA PATIENTS CONSUMER
27 COOPERATIVE CORPORATION

28 **SET NUMBER:** One

AUSTIN LEGAL GROUP, APC
3990 Old Town Ave, Ste A-112
San Diego, CA 92110

1 Defendant POINT LOMA PATIENTS CONSUMER COOPERATIVE CORPORATION
2 ("Defendant" or "Responding Party") submits the following response and objection to plaintiff
3 KARL BECK's (Plaintiff" or "Propounding Party") Requests for Production of Documents, Set
4 One, Request No. 1 only.

5 **Response To Request for Production of Document, No. 1**

6 **REQUEST NO. 1:**

7 An export list containing the names and addresses of all members of the PLPCC since
8 January 1, 2015.

9 **RESPONSE TO REQUEST NO. 1:**

10 Responding Party objects to this request on the grounds it requests Responding Party's
11 trade secret or other confidential and proprietary commercial information.

12 Responding Party objects to this request on the grounds it calls for the production of
13 documents that are protected by a right of privacy under the United States Constitution, Article I
14 of the Constitution of California or any other applicable law.

15 Responding Party objects to this request on the grounds it violates California state law
16 governing health information privacy including the Confidentiality of Medical Information Act,
17 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

18
19 DATED: January 5, 2018

AUSTIN LEGAL GROUP, APC

20
21 By: *Tamara Leetham*
22 Gina Austin/Tamara Leetham
23 Attorneys for Point Loma Patients Consumer
24 Cooperative Corporation
25
26
27
28

EXHIBIT C



February 1, 2018

Via Electronic Mail

Tamara Leetham
AUSTIN LEGAL GROUP, APC
3990 Old Town Ave, Suite A112
San Diego, 92110
tamara@austinlegalgroup.com

Re: Meet and Confer – Plaintiff’s Request No. 1 to PLPCC

Dear Tammy,

I have received today’s meet and confer letter regarding Plaintiff’s Request for Production No. 1 to the PLPCC. A few points of clarification follow.

For the purpose of meet and confer, “member” in Request No. 1 should be read to include associate members. The Request is intended to obtain identity and contact information for the proposed class, and should be construed accordingly.

We are aware that the PLPCC collects name, address and telephone information from patrons upon their first visit to the PLPCC, and enters this information into a database. Thus, when Request 1 asks for an “export list” of name and address information, it is asking the PLPCC to export this list for use by a notice administrator, and ultimately, Plaintiff’s counsel to identify class members.

Concerning your objection under the CMIA, Section 56.10 of the Civil Code governs the “disclosure” of medical information by a health care provider. Civil Code § 56.10(a) provides that “[a] provider of health care, health care service plan, or contractor shall not disclose medical information regarding a patient ... without first obtaining an authorization, except as provided in subdivision (b) or (c).” The CMIA defines “Medical information” to mean “any individually identifiable information ... regarding a patient’s medical history, mental or physical condition, or treatment.” Civ Code § 56.05.

Since Request No. 1 does not require disclosure of “medical information,” just name and address, the CMIA is not implicated. And even if Plaintiff did seek disclosure of “medical information” – he does not – it can still be produced “by a court pursuant to an order of that court.” CIV. CODE § 56.10(b)(1).

A handwritten signature in grey ink, appearing to read 'The Restis Law Firm, P.C.', is positioned above a horizontal line.

Since the CMIA is not an issue here, that should address Defendants' objections. Please let me know if the proposed joint language to class members is acceptable.

Sincerely,

A handwritten signature in black ink, appearing to read "William R. Restis", written over a horizontal line.

William R. Restis, Esq.

THE RESTIS LAW FIRM, P.C.
william@restislaw.com

Cc: Jeffrey R. Krinsk, Esq.
Matthew Dart, Esq.

A handwritten signature in grey ink, appearing to read "The Restis Law Firm, P.C.", written over a horizontal line.

EXHIBIT D

**ATTENTION CUSTOMERS OF POINT LOMA PATIENTS CONSUMER COOPERATIVE
BETWEEN JANUARY 1, 2015 AND DECEMBER 31, 2017**

**This Court ordered notice is to inform you that your name and address
may be disclosed to plaintiff's counsel in a class action lawsuit**

You received this Notice because you may have been a customer of the Point Loma Patients Consumer Cooperative Corporation (the "PLPCC"). The San Diego Superior Court has ordered this notice to inform you of your right to object to disclosure of your name and address to plaintiff's counsel in the class action lawsuit *Beck v. PLPCCC et al.*, No. 37-2017-00037524-CU-BT-CTL.

The lawsuit alleges that as a cooperative corporation, the PLPCC was required to distribute all profits to its patrons. Instead, the lawsuit alleges the PLPCC's owners wrongfully paid out revenues to themselves and several shell companies to avoid showing a profit. The lawsuit seeks to recover these profits for PLPCC patrons. The PLPCC and the other defendants vehemently deny they have done anything wrong, and believe Plaintiff's counsel should not have the right to contact you.

The defendants have argued that current plaintiff Karl Beck may not be a suitable person to represent the class and that customers are not entitled to share in the PLPCC's profits. Accordingly, plaintiff's counsel wish to contact potential plaintiffs to investigate the case and ensure it can proceed for the benefit of the class. **This notice is being sent at the Court's direction before the PLPCC provides plaintiff's counsel with your name and address. Unless you respond that you do not want to be contacted, plaintiff's counsel will be given your contact information for the sole purpose of discussing the case.**

To allow the disclosure of your name and address to plaintiff's counsel for use in this lawsuit, simply do nothing. If you do not respond to this letter, plaintiff's counsel is permitted to contact you. If you do not want to be contacted, please sign your name on the back of this card and mail it to [NOTICE ADMINISTRATOR] by [30 days from mailing]. Thank you.

[NOTICE
ADMINISTRATOR]
P.O. Box XXXXXX
[ADDRESS]

**I do not wish to be contacted by
Plaintiff's counsel**

<<FName>> <<LName>>
<<Addr1>> <<Addr2>>
<<City>>, <<State>> <<Zip>>

EXHIBIT E



William Restis <william@restislaw.com>

Fwd: Letter of Today's Date

1 message

William Restis <william@restislaw.com>
To: Karl Beck <Khbeck2@gmail.com>

Wed, Sep 20, 2017 at 10:09 AM

This is hilarious.

Let's discuss when I get back.

B

Begin forwarded message:

From: "Austin, Gina" <gaustin@austinlegalgroup.com>
Date: September 20, 2017 at 8:48:26 AM PDT
To: William Restis <william@restislaw.com>
Cc: "Slaff, Lori" <lbrite@austinlegalgroup.com>, "Leetham, Tamara" <tamara@austinlegalgroup.com>
Subject: RE: Letter of Today's Date

Thank you. I can confirm that at one point Mr. Beck was a member. I can not confirm whether he is still a member because I have not reviewed all board actions subsequent to his initial membership. I do know that he was banned from the facility due to his inappropriate and harassing behavior towards other members within 30 days of becoming a member.

In an effort to assist you in your due diligence I am providing a copy of the bylaws that were in effect when he became an associate member.

If you want to call the office to set up a time to talk after you return Lori can get you on my calendar. She is cc'd on this email.

Gina

Gina M. Austin

AUSTIN LEGAL GROUP, APC | 3990 Old Town Ave., Ste A112, San Diego, CA 92110 |

Ofc: 619-924-9600 | Cell 619-368-4800 | Fax 619-881-0045

Confidentiality Notice

This message is being sent on behalf of a lawyer. It is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of the message.

EXHIBIT F



December 6, 2017

Via Electronic Mail

Tamara Leetham
AUSTIN LEGAL GROUP, APC
3990 Old Town Ave, Suite A112
San Diego, 92110
tamara@austinlegalgroup.com

Re: *Meet and Confer - Pl's Request for Production No. 1 to PLPCCC*

Dear Ms. Leetham,

This letter concerns Plaintiff's Request for Production Number One to the PLPCCC. Specifically, Plaintiff requested "[a]n export list containing the names and addresses of all members of the PLPCCC since January 1, 2015."

Plaintiff is requesting this information, *inter alia*, because defendants assert that Mr. Beck is not a proper or suitable class representative. I am specifically referring to defendant's contentions that Plaintiff was purportedly "banned from the facility due to his inappropriate and harassing behavior towards other members within 30 days of becoming a member."

Of course Plaintiff contends he is an adequate class representative. But in situations such as these, California law allows the putative class representative to seek precertification discovery of the names and contact information of the absent class members to ensure the class is adequately represented. *Cashcall v. Sup. Ct.* (2008) 159 Cal.App.4th 273.¹

We of course wish to respect the privacy interests of PLPCCC members. For that reason, we propose the pre-production notice procedure described in *Best Buy Stores L.P. v. Sup. Ct.* (2006) 137 Cal.App.4th 772. Under the "Best Buy" procedure, absent class members are provided notice of claims in the Complaint, and of the Plaintiff's request for disclosure of their contact information. Notice is sent from an independent third party, usually one of the many class claims administrators. Absent class members are afforded an opportunity to refuse. The names and addresses of members who do not opt-out are then provided to Plaintiff's counsel. *See also Belaire-West Landscape, Inc. v. Sup. Ct.* (2007) 149 Cal.App.4th 554; *Lee v. Dynamex, Inc.* (2008) 166 Cal.App.4th 1325; *Puerto v. Sup Ct.* (2008) 158 Cal.App.4th 1242.

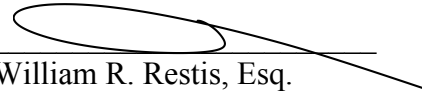
¹ It should be noted that Plaintiff is generally entitled to contact information of putative class members as such, or as percipient witnesses. *See Pioneer Electronics (USA) v. Sup. Ct.* (2007) 40 Cal.4th 360. Plaintiff also seeks this discovery for those and other permissible purposes.

A handwritten signature in black ink, appearing to read 'The Restis Law Firm, P.C.', is written over a horizontal line.

I am raising these issues now because the meet and confer process on this point can be time consuming. Items to resolve would include the content of the notice to PLPCCC members, agreement on a suitable administrator to send the notice, the opt-out period, and the format of production to Plaintiff.

Please let me know as soon as possible the PLPCCC's position on these matters.

Sincerely,



William R. Restis, Esq.

THE RESTIS LAW FIRM, P.C.
william@restislaw.com

Cc: Jeffrey R. Krinsk, Esq.
Matthew Dart, Esq.



EXHIBIT G



January 9, 2018

Via Electronic Mail

Tamara Leetham
AUSTIN LEGAL GROUP, APC
3990 Old Town Ave, Suite A112
San Diego, 92110
tamara@austinlegalgroup.com

Re: Meet and Confer - Pl's Request for Production No. 1 to PLPCCC

Dear Ms. Leetham,

On December 6, 2017 I sent a letter to you meeting and conferring about Plaintiff's Request for Production Number 1 to the PLPCC. On January 5th, the PLPCC responded with objections. However, those objections appear to be addressed by my December 6th letter. Please provide the PLPCC's response to my meet and confer so we can frame the issues for the Court if necessary.

Sincerely,



William R. Restis, Esq.

THE RESTIS LAW FIRM, P.C.
william@restislaw.com

Cc: Jeffrey R. Krinsk, Esq.
Matthew Dart, Esq.



EXHIBIT H



William Restis <william@restislaw.com>

Re: Beck v. PLPCC et al.

1 message

William Restis <william@restislaw.com>

Tue, Jan 30, 2018 at 3:17 PM

To: "Leetham, Tamara" <tamara@austinlegalgroup.com>, Jeffrey Krinsk <jrk@classactionlaw.com>, Shelby Ramsey <smr@classactionlaw.com>

Cc: Matthew Dart <matt@dartlawfirm.com>

Tamara,

I look forward to your thoughts. In the interim, attached is plaintiff's proposed notice to class members which will be included with our *Cashcall* motion for the Court's approval. We contemplate retaining a third party administrator to send out the notices consistent with the case law cited in my meet and confer letter. The PLPCC would provide the administrator with an export file from its database and we would not see class member information until the opt-out period is over.

We are providing this to meet and confer on the contents of the notice. Hopefully we can present agreed upon language so the Court does not have to address its content if our motion is granted.

Best,

Bill

William R. Restis

The Restis Law Firm, P.C.

550 West C Street, Suite 1760

San Diego, CA 92101

Dir: +1.619.270.8388

Fax: +1.619.752.1552

restislaw.com

On Tue, Jan 30, 2018 at 12:58 PM, Leetham, Tamara <tamara@austinlegalgroup.com> wrote:

Bill,

I have been out of the office. I will get a response to your meet and confer letter by tomorrow.

Thank you,

Tamara M. Leetham, Esq. | Austin Legal Group, APC | tamara@austinlegalgroup.com

3990 Old Town Ave., Ste A-112, San Diego, CA 92110

Office Phone: [619-924-9600](tel:619-924-9600)

Fax Number: [619-881-0045](tel:619-881-0045)

www.austinlegalgroup.com

Confidentiality Notice:

This message is being sent on behalf of a lawyer. It is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of the message.



PLPCC Postcard notice.docx

31K

EXHIBIT I

Austin Legal Group

LAWYERS
3990 OLD TOWN AVE, STE A-112
SAN DIEGO, CA 92110

LICENSED IN CALIFORNIA & HAWAII
TELEPHONE
(619) 924-9600

FACSIMILE
(619) 881-0045

Writer's Email:
tamara@austinlegalgroup.com

February 1, 2018

Mr. William Restis, Esq.
The Restis Law Firm
550 W. C Street, Suite 1760
San Diego, CA 92101
william@restislaw.com

Via E-mail Only

Re: Response to December 6, 2017 letter re. PLPCC Response to RPD No. 1
Beck v. PLPCC, et al.
Case No. 37-2017-00037524-CU-BT-CTL

Dear Mr. Restis,

This letter constitutes defendant Point Loma Patients Consumer Cooperative's meet and confer letter regarding Plaintiff's Request for Production Number One for "[a]n export list containing the names and addresses of all members of PLPCC since January 1, 2015." As you know, PLPCC responded to this request with objections including objections to medical confidentiality.

As an initial matter, PLPCC has a "member" class and "associate members." Plaintiff is an "associate member" with no "member" and therefore only one name to disclose. However, assuming *arguendo* that "associate members" are "members" for purposes of this correspondence, PLPCC's response to RPD No. 1 is precluded by California law.

RPD No. 1 Violates California's Confidentiality of Medical Information Act

California's Confidentiality of Medical Information Act ("CMIA") is codified in Civil Code section 56 et seq. The CMIA is intended to protect the confidentiality of individually identifiable medical information obtained from a patient by a health care provider. As you know, California voters passed Proposition 64 ("Prop 64") which, among other things, legalized recreational marijuana use. Prop 64 also extends privacy protection to patients who hold a Medical Marijuana Identification Card (MMIC) card issued under the Medical Marijuana Program Act (MMPA) and precludes the Department of Public Health or any county public health department from disclosing individually identifiable information under the Confidentiality of Medical Information Act.

PLPCC's patrons are medical marijuana users – each member has a medical condition and a physician's recommendation which qualifies them to patronize PLPCC. The information RPD No. 1 requests requires PLPCC to disclose individually identifiable information for each medical marijuana user. Put another way, an "associate member" must be a "qualified patient." The two cannot be separated. RPD No. 1 accordingly requests a list of names of people that all have a medical condition

William Restis
February 1, 2018
Page 2

that allows them to purchase and use medical marijuana. PLPCC cannot, and will not, disclose this information.

RPD No. 1 Requests Confidential Or Proprietary Information

The “member” list is also a proprietary customer list that includes person confidential information and Plaintiff is not entitled to disclosure.

No Disclosure Absent A Protective Order

Pursuant to Code of Civil Procedure section 2031.060, a protective order may include directions that “commercial information” be disclosed only to specific persons. (Code Civ. Proc., § 2031.060; *Stadish v. Superior Court* (1999) 71 Cal.App.4th 1130, 1144 (“upon a proper showing a party may — even after it has waived its right to object to the production of documents, and has produced most of the documents requested — seek a protective order restricting dissemination of the documents”); *Richards v. Superior Court* (1978) 86 Cal.App.3d 265, 272 (“It seems a rare instance indeed that the potential of disclosure for purposes unrelated to the lawsuit or to persons other than counsel and their representatives serves any purpose except to give a tactical edge to the party who has obtained discovery of the information by allowing that party the benefit of pressure in settlement negotiations by threat or implication of disclosure”).)

PLPCC, along with all other Defendants, request a protective order that will ensure commercially sensitive and private personal information concerning PLPCC, and all other Defendants’ business dealings in connection with a medical marijuana dispensary will not be publicly disseminated. PLPCC will not produce any documents unless and until the parties have agreed to, and the Court has entered, a protective order.

Please do not hesitate to contact me if you wish to discuss further.

Sincerely,

AUSTIN LEGAL GROUP, APC



Tamara M. Leetham

EXHIBIT J

Austin Legal Group

LAWYERS
3990 OLD TOWN AVE, STE A-112
SAN DIEGO, CA 92110

LICENSED IN CALIFORNIA & HAWAII
TELEPHONE
(619) 924-9600

FACSIMILE
(619) 881-0045

Writer's Email:
tamara@austinlegalgroup.com

February 8, 2018

Mr. William Restis, Esq.
The Restis Law Firm
550 W. C Street, Suite 1760
San Diego, CA 92101
william@restislaw.com

Via E-mail Only

Re: *Beck v. PLPCC, et al.*
Case No. 37-2017-00037524-CU-BT-CTL
Proposed Noticing Procedures and Class Discovery

Dear Mr. Restis,

This letter constitutes defendant Point Loma Patients Consumer Cooperative's meet and confer effort regarding your demand for PLPCC "member" information. As you know from prior correspondence, we interposed numerous discovery objections that preclude your request in its entirety. This letter addresses additional issues related to precertification notices.

Right To Privacy Precludes PLPCC's Disclosure Of Patients And Qualified Caregivers

While the "[c]ontact information regarding the identity of potential class members is generally discoverable," it can be limited by the California Constitution's express right to privacy. (*Pioneer Electronics v. Superior Court* (2007) 40 Cal.4th 360, 373-374; Cal. Const. Art. 1 § 1.) Although contact information is "private," it is not particularly sensitive, unlike personal medical or financial information. (*Pioneer, supra*, 40 Cal.4th at 372.) As you know, in our discovery responses, we objected to disclosing identifying information of PLPCC's patients and qualified caregivers on the grounds it is protected medical information.

This is a serious, invasive, and unique request. Your discovery requests are not simply asking for identifying information of "members" of a regular business entity, like a corporation or limited liability company. Your discovery requests for pre-certification information demand identifying information of individuals who are patronizing PLPCC **because of an underlying medical need**. You cannot divorce the "associate member" from his/her status as a patient using medical marijuana or a qualified caregiver who is procuring medical marijuana for another individual.

In addition, and as you know, medical marijuana was, and remains, permissible in San Diego and California. As you also know, marijuana remains illegal as a schedule 1 drug under the federal Controlled Substances Act. PLPCC's patients and qualified caregivers cannot divorce themselves from the reality that their patronage to PLPCC inherently violates federal law.

Thus each factor on its own, revealing medical information or the names of individuals who could be accused of violating federal law, is sufficient to justify non-disclosure of PLPCC's qualified patients and caregivers; when coupled together, it is evident that the balance weighs in favor of PLPCC's qualified patients and caregivers and compels non-disclosure of their identifying information.

CashCall Provides No Right to Pre-Certification Discovery of Absent Class Members in this Action

Your December 6, 2017 meet and confer letter requests an export list of the names and addresses of all members of PLPCC since January 1, 2015. The stated basis for the request is "because defendants assert that Mr. Beck is not a proper or suitable class representative" and the cited legal authority is *CashCall v. Sup. Ct.* (2008) 159 Cal.App.4th 273. However, that basis is inapplicable in the current action, and the legal authority is inapposite.

To date, Defendants have not asserted in this litigation that Beck is an improper or unsuitable class representative on the basis cited in your letter (inappropriate and harassing conduct towards other members). You appear to be referring to pre-litigation *settlement* discussions with Gina Austin. The Complaint was not filed until several weeks later, and to date in this action Defendants have not taken a position as to whether Mr. Beck is a proper class representative on the basis of the conduct you describe. Therefore, the stated basis for your request for PLPCC's private names and contact information is wholly inapplicable.

Moreover, *CashCall* is inapposite to the present case. In *CashCall* the court wrestled with a "Catch 22 absurdity" that would deny the putative class members a suitable class representative and cause the statute of limitations to run "leaving the actual class members without a remedy for *CashCall*'s violation of their privacy rights."

Thus, after applying the balancing test, the Court affirmed the trial court's determination "that precertification discovery of the names and contact information of potential class members is warranted under the circumstances of this case." This, of course, is inapposite to the present action, where no such Catch 22 absurdity or resulting expiring statute of limitation exists.

William Restis
February 8, 2018
Page 3

Given these circumstances, and the weighty privacy rights of the potential class members as summarized above, the balancing test falls squarely in favor of no pre-certification discovery of potential class members' contact information. Defendants will oppose any *CashCall* motion on these grounds. Please do not hesitate to contact me if you wish to discuss further.

Sincerely,

AUSTIN LEGAL GROUP, APC

A handwritten signature in cursive script that reads "Tamara M. Leetham".

Tamara M. Leetham

EXHIBIT K



William Restis <william@restislaw.com>

Re: Beck v. PLPCC, et al. Case No. 37-2017-00037524-CU-BT-CTL

1 message

William Restis <william@restislaw.com>

Sun, Feb 11, 2018 at 2:58 PM

To: ALG Admin <admin@austinlegalgroup.com>, Shelby Ramsey <smr@classactionlaw.com>

Cc: "matt@dartlawfirm.com" <matt@dartlawfirm.com>, "jrk@classactionlaw.com" <jrk@classactionlaw.com>, "Leetham, Tamara" <tamara@austinlegalgroup.com>

Tammy and Matthew,

Thank you for your February 8th meet and confer. I better appreciate your objection about the "disclosure" of medical information and/or potentially illegal conduct. To address your concerns, and further protect the privacy of putative class members, we have removed any reference to marijuana from the notice. Accordingly, the only remaining privacy interests relate to name and address. As your letter said, and case law confirms, contact information "is not particularly sensitive."

The motion is otherwise "teed up," and Plaintiff is approaching his motion to compel deadline. Please let me know by close of business February 14th if Defendants will stipulate to the "Cashcall" type procedure.

Best,

Bill

William R. Restis

The Restis Law Firm, P.C.

550 West C Street, Suite 1760

San Diego, CA 92101

Dir: +1.619.270.8388

Fax: +1.619.752.1552



restislaw.com

On Thu, Feb 8, 2018 at 4:02 PM, ALG Admin <admin@austinlegalgroup.com> wrote:

Dear Counsel,

Attached please find the letter dated **February 8, 2018**, from **Tamara Leetham** regarding the Proposed Noticing Procedures and Class Discovery.

Please feel free to call should you have any questions.

Best regards,

Tami Ratliffe

Paralegal/Office Manager

Austin Legal Group, APC

3990 Old Town Ave Suite A-112

San Diego, CA 92110

619.924.9600 (office)

619-881-0045 (fax)

Confidentiality Notice

This message is being sent on behalf of a law firm. It is intended exclusively for the individual or entity to which it is addressed. This communication may contain information that is proprietary, privileged or confidential or otherwise legally exempt from disclosure. If you are not the named addressee, you are not authorized to read, print, retain, copy or disseminate this message or any part of it. If you have received this message in error, please notify the sender immediately by e-mail and delete all copies of the message.

**PLPCC Postcard notice copy WRR Redline.docx**

33K

**ATTENTION CUSTOMERS OF POINT LOMA PATIENTS CONSUMER COOPERATIVE
BETWEEN JANUARY 1, 2015 AND DECEMBER 31, 2017**

**This Court ordered notice is to inform you that your name and address
may be disclosed to plaintiff's counsel in a class action lawsuit**

You received this Notice because you may have been a customer of the Point Loma Patients Consumer Cooperative Corporation (the "PLPCC"). The San Diego Superior Court has ordered this notice to inform you of your right to object to disclosure of your name and address to plaintiff's counsel in the class action lawsuit *Beck v. PLPCCC et al.*, No. 37-2017-00037524-CU-BT-CTL.

The lawsuit alleges that as a cooperative corporation, the PLPCC was required to distribute all profits to its patrons. Instead, the lawsuit alleges the PLPCC's owners wrongfully paid out revenues to themselves and several shell companies to avoid showing a profit. The lawsuit seeks to recover these profits for PLPCC patrons. The PLPCC and the other defendants vehemently deny they have done anything wrong, and believe Plaintiff's counsel should not have the right to contact you.

The defendants have argued that current plaintiff Karl Beck may not be a suitable person to represent the class and that customers are not entitled to share in the PLPCC's profits. Accordingly, plaintiff's counsel wish to contact potential plaintiffs to investigate the case and ensure it can proceed for the benefit of the class. This notice is being sent at the Court's direction before the PLPCC provides plaintiff's counsel with your name and address. Unless you respond that you do not want to be contacted, plaintiff's counsel will be given your contact information for the sole purpose of discussing the case.

To allow the disclosure of your name and address to plaintiff's counsel for use in this lawsuit, simply do nothing. If you do not respond to this letter, plaintiff's counsel is permitted to contact you. If you do not want to be contacted, please sign your name on the back of this card and mail it to [NOTICE ADMINISTRATOR] by [30 days from mailing]. Thank you.

**Deleted: THE...POINT LOMA PATIENTS
CONSUMER COOPERATIVE CORPORATION ... [1]**

Deleted: contact...ddress information ... [2]

**Deleted: records from...ou may have been a customer of
the Point Loma Patients Consumer Cooperative Corporation
(the "PLPCC"), indicate that you were a customer... ¶
The San Diego Superior Court has ordered this notice to
inform you of your right to object to disclosure of your
name and,...address to plaintiff's counsel and phone
number ...n connection with ... [3]**

**Deleted: The lawsuit alleges that prior to January 1, 2018
the PLPCC was operating as a for-profit medical marijuana
dispensary even though California law required the sale of
medical marijuana to be non-profit. ...he lawsuit alleges
that as a cooperative corporation, the PLPCC was required
to distribute all its...profits to to you, ...ts patrons. Instead... [4]**

**Deleted: contend ...ave argued that current plaintiff Karl
Beck may not be a suitable person to represent the class... [5]**

Formatted: Font: Bold

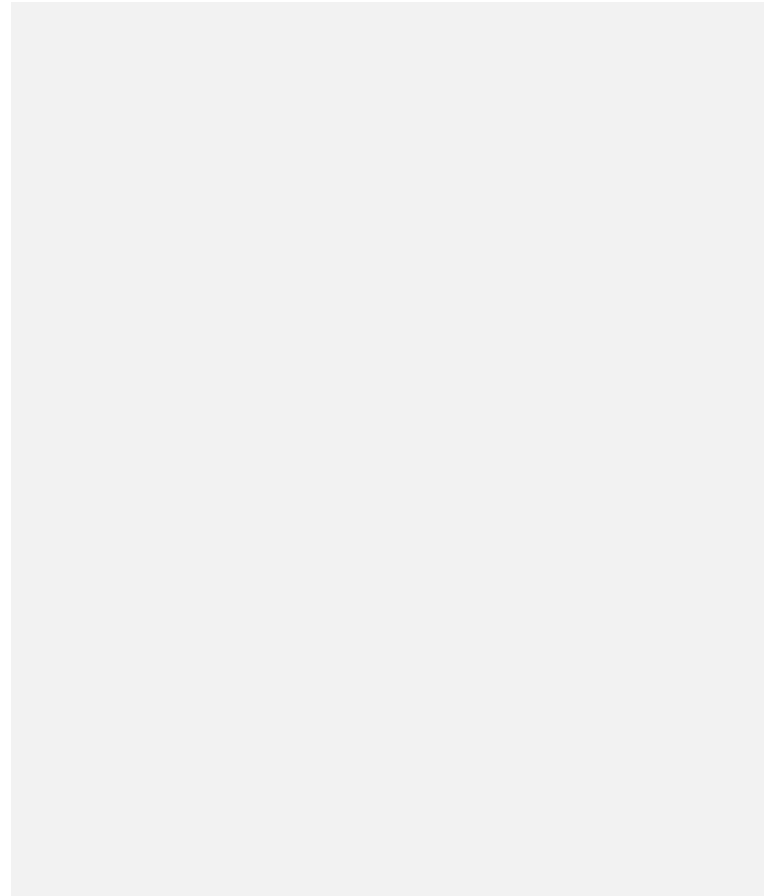
**Deleted: ,...address and telephone number... Unless you
respond that you do not want to be contacted, plaintiff's... [6]**

Deleted: identity and contact information

NOTICE
ADMINISTRATOR]
P.O. Box XXXXXX
[ADDRESS]

**do not wish to be contacted by
Plaintiff's counsel**

<<FName>> <<LName>>
<<Addr1>> <<Addr2>>
<<City>>, <<State>> <<Zip>>



Page 1: [1] Deleted **Author**

THE

Page 1: [1] Deleted **Author**

THE

Page 1: [2] Deleted **Author**

contact

Page 1: [2] Deleted **Author**

contact

Page 1: [3] Deleted **Author**

records from

Page 1: [3] Deleted **Author**

records from

Page 1: [3] Deleted **Author**

records from

Page 1: [3] Deleted **Author**

records from

Page 1: [3] Deleted **Author**

records from

Page 1: [3] Deleted **Author**

records from

Page 1: [4] Deleted **Author**

The lawsuit alleges that prior to January 1, 2018 the PLPCC was operating as a for-profit medical marijuana dispensary even though California law required the sale of medical marijuana to be non-profit.

Page 1: [4] Deleted **Author**

The lawsuit alleges that prior to January 1, 2018 the PLPCC was operating as a for-profit medical marijuana dispensary even though California law required the sale of medical marijuana to be non-profit.

Page 1: [4] Deleted **Author**

The lawsuit alleges that prior to January 1, 2018 the PLPCC was operating as a for-profit medical marijuana dispensary even though California law required the sale of medical marijuana to be non-profit.

Page 1: [4] Deleted **Author**

The lawsuit alleges that prior to January 1, 2018 the PLPCC was operating as a for-profit medical marijuana dispensary even though California law required the sale of medical marijuana to be non-profit.

Page 1: [4] Deleted **Author**

The lawsuit alleges that prior to January 1, 2018 the PLPCC was operating as a for-profit medical marijuana dispensary even though California law required the sale of medical marijuana to be non-profit.

Page 1: [4] Deleted **Author**

The lawsuit alleges that prior to January 1, 2018 the PLPCC was operating as a for-profit medical marijuana dispensary even though California law required the sale of medical marijuana to be non-profit.

Page 1: [4] Deleted **Author**

The lawsuit alleges that prior to January 1, 2018 the PLPCC was operating as a for-profit medical marijuana dispensary even though California law required the sale of medical marijuana to be non-profit.

Page 1: [4] Deleted **Author**

The lawsuit alleges that prior to January 1, 2018 the PLPCC was operating as a for-profit medical marijuana dispensary even though California law required the sale of medical marijuana to be non-profit.

Page 1: [4] Deleted **Author**

The lawsuit alleges that prior to January 1, 2018 the PLPCC was operating as a for-profit medical marijuana dispensary even though California law required the sale of medical marijuana to be non-profit.

Page 1: [5] Deleted **Author**

contend

Page 1: [5] Deleted **Author**

contend

Page 1: [5] Deleted **Author**

contend

Page 1: [6] Deleted **Author**

,

Page 1: [6] Deleted **Author**

,

Page 1: [6] Deleted **Author**

,