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DOUGLAS JAFFE, ESQ. Bar No. 170354  
LAW OFFICES OF DOUGLAS JAFFE  
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Telephone: (619) 400-4945  
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**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego  
**11/20/2023** at 08:51:00 AM  
Clerk of the Superior Court  
By E- Filing, Deputy Clerk

Attorneys for Razuki Investments, LLC, and Salam Razuki

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO - CENTRAL

SAN DIEGO PATIENTS COOPERATIVE  
CORPORATION, INC., et. al.

Plaintiffs,

vs.

RAZUKI INVESTMENTS, LLC, et. al.,

Defendants.

Case No.: 37-2017-00020661-CU-CO-CTL

**OBJECTIONS TO PROPOSED  
JUDGMENT ON JURY VERDICT, AND  
[PROPOSED] ORDER ON OBJECTIONS**

Defendants Razuki Investments, LLC and Salam Razuki submit their Objections To The  
Proposed Judgment On Jury Verdict, And Proposed Order On Objections as follows:

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	<b>Material Objected To:</b>	<b>Grounds For Objection</b>	<b>Ruling On Objection</b>
1	Entire Proposed Judgment	Plaintiffs improperly failed to serve the proposed judgment on all Defendants (including Keith Henderson and Ninus Malan) before submitting it to the Court. All Defendants were therefore not given the opportunity to respond to the proposed judgment and provide their comments and proposed changes before it was submitted to the Court.	Sustained: _____  Overruled: _____
2	Entire Proposed Judgment	Plaintiffs have not properly met and conferred regarding the proposed judgment.  [The Razuki Defendants sent comments and proposed changes to the proposed judgment to counsel for Plaintiffs (on the date of receipt of the proposed judgment), but Plaintiffs failed to address and/or include the comments and proposed changes in the proposed judgment submitted by Plaintiffs to the Court. <i>See</i> , attached emails. Counsel for the Razuki Defendants is preparing a proposed judgment as stated in the attached emails.]	Sustained: _____  Overruled: _____

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3	Entire Proposed Judgment	The proposed judgment improperly fails to fully include and properly reference the non-suit rulings (C.C.P. section 581c), and dismissals with prejudice (C.C.P. section 581(e)), in favor of Defendants.	Sustained: _____ Overruled: _____
4	Entire Proposed Judgment	The proposed judgment improperly fails to include the language of the jury verdict for questions decided by the jury.	Sustained: _____ Overruled: _____
5	Entire Proposed Judgment	Judgment should not be entered until the Court hears Razuki Investments' motions for new trial and/or motion for judgment notwithstanding the verdict.	Sustained: _____ Overruled: _____
6	"Based on the foregoing, IT IS HEREBY ORDERED AND ADJUDGED that plaintiff Bradford Harcourt is the prevailing party. . ."	The Court made no determination of prevailing party status.  [Some or all of Defendants will be seeking fees and costs.]	Sustained: _____ Overruled: _____

Dated: November 20, 2023

LAW OFFICES OF DOUGLAS JAFFE

*Douglas Jaffe*

\_\_\_\_\_  
Douglas Jaffe, Esq.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

\_\_\_\_\_  
Judge of the Superior Court  
County of San Diego



Douglas Jaffe &lt;dougjaffelaw@gmail.com&gt;

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**Re: San Diego Patients v. Razuki Investments**

1 message

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**Douglas Jaffe** <dougjaffelaw@gmail.com>  
To: "Charles C. Cavanagh" <ccavanagh@messner.com>  
Cc: Mark Collier <mcollier@messner.com>

Thu, Nov 16, 2023 at 12:53 PM

I will.

Douglas Jaffe, Esq.  
501 West Broadway  
Suite 800  
San Diego, CA 92101  
(619) 400-4945

On Nov 16, 2023, at 12:52 PM, Charles C. Cavanagh <ccavanagh@messner.com> wrote:

Doug:

If you would like to submit a marked-up version for my consideration, I would be happy to look at it.

Best regards,

Charles

**CHARLES C. CAVANAGH**

Partner

**Messner Reeves LLP****D:** 303.454.2144 **O:** 303.623.1800 **E:** ccavanagh@messner.com

1550 Wewatta Street, Suite 710 Denver, CO 80202

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**From:** Douglas Jaffe <dougjaffelaw@gmail.com>  
**Sent:** Thursday, November 16, 2023 1:18 PM  
**To:** Charles C. Cavanagh <ccavanagh@messner.com>  
**Cc:** Mark Collier <mcollier@messner.com>  
**Subject:** Re: San Diego Patients v. Razuki Investments

[ EXTERNAL EMAIL ]

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The proposed judgment is clearly improper given that you have failed to include the jury verdicts.

You have also, without limitation, failed to include the claims decided by the Court by non-suit.

Furthermore, there was no determination of a prevailing party and Salam Razuki and/or Razuki Investments, LLC will be seeking costs and attorneys' fees given the claims the jury rejected and the lease claim which was brought and dismissed. *See, Santisas v. Goodin* (1998) 17 Cal. 4th 599.

On Thu, Nov 16, 2023 at 8:54 AM Charles C. Cavanagh <ccavanagh@messner.com> wrote:

Doug:

Here is a draft proposed judgment for your review and comment. Please let me know if you have any suggested edits. We plan to file this with the Court by the end of the day tomorrow.

Best regards,

Charles

**CHARLES C. CAVANAGH**

Partner

**D:** 303.454.2144 **O:** 303.623.1800 **E:** ccavanagh@messner.com

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