

ATTORNEY OR PARTY WITHOUT ATTORNEY NAME: Charles C. Cavanagh FIRM NAME: Messner Reeves LLP STREET ADDRESS: 1550 Wewatta Street, Suite 710 CITY: Denver TELEPHONE NO.: (303) 623-1800 E-MAIL ADDRESS: ccavanagh@messner.com ATTORNEY FOR (name): Plts - San Diego Patients Cooperative Corporation & Bradford Harcourt	STATE BAR NUMBER: 198468 FOR COURT USE ONLY ELECTRONICALLY FILED Superior Court of California, County of San Diego 02/29/2024 at 05:14:00 PM Clerk of the Superior Court By E- Filing, Deputy Clerk
SUPERIOR COURT OF CALIFORNIA, COUNTY OF San Diego STREET ADDRESS: 330 West Broadway MAILING ADDRESS: 330 West Broadway CITY AND ZIP CODE: San Diego, CA 92101 BRANCH NAME: Hall of Justice	
PLAINTIFF: San Diego Patients Cooperative Corporation & Bradford Harcourt DEFENDANT: Razuki Investments, LLC	
MEMORANDUM OF COSTS (SUMMARY)	CASE NUMBER: 37-2017-00020661-CU-CO-CTL


	TOTALS
1. Filing and motion fees	\$ 435.00
2. Jury fees	\$ 2,655.78
3. Jury food and lodging	\$
4. Deposition costs	\$ 16,151.99
5. Service of process	\$ 1,197.50
6. Attachment expenses	\$
7. Surety bond premiums	\$
8. Witness fees	\$ 215.75
9. Court-ordered transcripts	\$
10. Attorney fees <i>(enter here if contractual or statutory fees are fixed without necessity of a court determination; otherwise a noticed motion is required)</i>	\$
11. Court reporter fees as established by statute	\$ 222.75
12. Models, enlargements, and photocopies of exhibits	\$ 6,908.34
13. Interpreter fees	\$
14. Fees for electronic filing or service	\$
15. Fees for hosting electronic documents	\$
16. Other	\$ 1,366.66
TOTAL COSTS	\$ 29,153.77

I am the attorney, agent, or party who claims these costs. To the best of my knowledge and belief this memorandum of costs is correct and these costs were necessarily incurred in this case.

Date: Feb 29, 2024

Charles C. Cavanagh

 (TYPE OR PRINT NAME)



 (SIGNATURE OF DECLARANT)

(Proof of service on reverse)

SHORT TITLE San Diego Patients Cooperative Corporation & Bradford Harcourt	CASE NUMBER: 37-2017-00020661-CU-CO-CTL
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PROOF OF MAILING PERSONAL DELIVERY

1. At the time of mailing or personal delivery, I was at least 18 years of age and **not a party** to this legal action.
2. My residence or business address is (*specify*):
 1550 Wewatta Street, Suite 710
 Denver, Colorado 80202
3. I mailed or personally delivered a copy of the *Memorandum of Costs (Summary)* as follows (*complete either a or b*):
 - a. **Mail.** I am a resident of or employed in the county where the mailing occurred.
 - (1) I enclosed a copy in an envelope AND
 - (a) **deposited** the sealed envelope with the United States Postal Service with the postage fully prepaid.
 - (b) **placed** the envelope for collection and mailing on the date and at the place shown in items below following our ordinary business practices. I am readily familiar with this business' practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.
 - (2) The envelope was addressed and mailed as follows:
 - (a) Name of person served: Douglas Jaffe, Esq.
 - (b) Address on envelope:
 501 West Broadway, Suite 800
 San Diego, CA 92101
 - (c) Date of mailing: Feb 29, 2024
 - (d) Place of mailing (*city and state*): Denver, Colorado
 - b. **Personal delivery.** I personally delivered a copy as follows:
 - (1) Name of person served:
 - (2) Address where delivered:
 - (3) Date delivered:
 - (4) Time delivered:

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date: Feb 29, 2024

Tara L. Nelson

(TYPE OR PRINT NAME)



(SIGNATURE OF DECLARANT)

SHORT TITLE San Diego Patients Cooperative Corporation & Bradford Harcourt	CASE NUMBER: 37-2017-00020661-C U-CO-CTL
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MEMORANDUM OF COSTS (WORKSHEET)

1. Filing and motion fees

	<u>Paper filed</u>	<u>Filing fee</u>
a. Complaint		\$ 435.00
b.		\$ _____
c.		\$ _____
d.		\$ _____
e.		\$ _____
f.		\$ _____
g. <input type="checkbox"/> Information about additional filing and motion fees is contained in Attachment 1g.		

TOTAL 1. \$ 435.00

2. Jury fees

	<u>Date</u>		<u>Fee & mileage</u>
a.	04/13/2023	\$	150.00
b.	08/02/2023	\$	150.00
c.	11/13/2023	\$	2,355.78
d.		\$	_____
e. <input type="checkbox"/> Information about additional jury fees is contained in Attachment 2e.			

TOTAL 2. \$ 2,655.78

3. Juror food: \$ _____ and lodging: \$ _____

TOTAL 3. \$ _____

4. Deposition costs

	<u>Name of deponent</u>		<u>Taking</u>		<u>Transcribing</u>		<u>Travel</u>		<u>Videotaping</u>		<u>Subtotals</u>
a.	Bradford Harcourt	\$		\$	913.32	\$		\$		\$	913.32
b.	Keith Henderson	\$		\$	3,133.40	\$		\$		\$	3,133.40
c.	Salam Razuki	\$		\$	554.80	\$		\$	320.00	\$	874.80
d.	Ninus Malan	\$		\$	3,002.28	\$	1,187.38	\$	1,780.00	\$	5,969.66
e. <input checked="" type="checkbox"/> Information about additional deposition costs is contained in Attachment 4e.											

TOTAL 4. \$ 16,151.99

(Continued on reverse)

SHORT TITLE San Diego Patients Cooperative Corporation & Bradford Harcourt	CASE NUMBER: 37-2017-00020661-C U-CO-CTL
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5. **Service of process**

	<u>Name of person served</u>	<u>Public officer</u>	<u>Registered process</u>	<u>Publication</u>	<u>Other (specify)</u>
a.	Razuki Investments	\$ _____	\$ 1,197.50	\$ _____	\$ _____
b.	_____	\$ _____	\$ _____	\$ _____	\$ _____
c.	_____	\$ _____	\$ _____	\$ _____	\$ _____
d.	<input type="checkbox"/> Information about additional costs for service of process is contained in Attachment 5d.				

TOTAL 5. \$ 1,197.50

6. Attachment expenses (specify):

6. \$ _____

7. Surety bond premiums (itemize bonds and amounts):

7. \$ _____

8. a. **Ordinary witness fees**

	<u>Name of witness</u>	<u>Daily fee</u>	<u>Mileage</u>	<u>Total</u>
(1)	Allison-McCloskey Escrow Compan	_____ days at _____ \$/day	_____ miles at _____ ¢/mile:	\$ 180.75
(2)	Allison-McCloskey Escrow Compan	_____ days at _____ \$/day	_____ miles at _____ ¢/mile:	\$ 35.00
(3)	_____	_____ days at _____ \$/day	_____ miles at _____ ¢/mile:	\$ _____
(4)	_____	_____ days at _____ \$/day	_____ miles at _____ ¢/mile:	\$ _____
(5)	_____	_____ days at _____ \$/day	_____ miles at _____ ¢/mile:	\$ _____

(6) Information about additional ordinary witness fees is contained in Attachment 8a(6).

SUBTOTAL 8a. \$ 215.75

(Continued on next page)

SHORT TITLE San Diego Patients Cooperative Corporation & Bradford Harcourt	CASE NUMBER: 37-2017-00020661-C U-CO-CTL
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8. b. **Expert fees** (per Code of Civil Procedure section 998)

	Name of witness	Fee			
(1)	_____	_____	hours at \$ _____	/hr	\$ _____
(2)	_____	_____	hours at \$ _____	/hr	\$ _____
(3)	_____	_____	hours at \$ _____	/hr	\$ _____
(4)	_____	_____	hours at \$ _____	/hr	\$ _____
(5)	<input type="checkbox"/> Information about additional expert fees is contained in Attachment 8b(5).				

SUBTOTAL 8b. \$ _____

c. **Court-ordered expert fees**

	Name of witness	Fee			
(1)	_____	_____	hours at \$ _____	/hr	\$ _____
(2)	_____	_____	hours at \$ _____	/hr	\$ _____
(3)	<input type="checkbox"/> Information about additional court-ordered expert fees is contained in Attachment 8c(3).				

SUBTOTAL 8c. \$ _____

TOTAL (8a, 8b, & 8c) 8. \$ _____

9. **Court-ordered transcripts** (specify):

9. \$ _____

10. **Attorney fees** (enter here if contractual or statutory fees are fixed without necessity of a court determination; otherwise a noticed motion is required):

10. \$ _____

11. **Models, enlargements, and photocopies of exhibits** (specify):

11. \$ 6,908.34

Court set of exhibit binders (2 copies, \$1,967.34); electronic presentation of exhibits (\$4,941.00)

12. **Court reporter fees** (as established by statute)

a. (Name of reporter): A Desiree Tipper Fees: \$ 222.75

b. (Name of reporter): _____ Fees: \$ _____

TOTAL 12. \$ 222.75

c. Information about additional court-reporter fees is contained in Attachment 12c.

13. **Interpreter fees**

a. Fees of a certified or registered interpreter for the deposition of a party or witness

(Name of interpreter): _____ Fees: \$ _____

(Name of interpreter): _____ Fees: \$ _____

b. Fees for a qualified court interpreter authorized by the court for an indigent person represented by a qualified legal services project or a pro bono attorney

(Name of interpreter): _____ Fees: \$ _____

(Name of interpreter): _____ Fees: \$ _____

TOTAL 13. \$ _____

c. Information about additional court-reporter fees is contained in Attachment 13c.

14. **Fees for electronic filing or service of documents through an electronic filing service provider** (enter here if required or ordered by the court):

14. \$ _____

15. **Fees for hosting electronic documents through an electronic filing service provider** (enter here if required or ordered by the court):

15. \$ _____

16. **Other** (specify): Court-Ordered Mediation

16. \$ 1,366.66

TOTAL COSTS \$ 29,153.77

(Additional information may be supplied on the reverse)

SHORT TITLE San Diego Patients Cooperative Corporation & Bradford Harcourt	CASE NUMBER: 37-2017-00020661-C U-CO-CTL
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1 Section 4(e) Deposition Costs
2
3 Deposition Transcripts - Christopher Stefan \$650.95; Far West PMK \$1,457.18 (Video \$703.75); Claudia Garcia \$2,215.35
4 Document Supoenas - Subpoena to Law Offices of Douglas Jaffe 1/2/2019 \$102.53; D. Jaffe 11/6/2019 \$80.50; D. Jaffe
5 12/15/2019 \$50.55;
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7
8 Section 14
9 Complaint 6/8/2017 \$11.31; Notice of Appearance 9/27/2022 \$23.16; Notice of Change of Address 12/12/2022 \$16.99; Notice
10 of Jury Fee Deposit 4/13/2023 \$17.76; Joint Trial Readiness Conference Report 10/23/2023 \$13.95; Opposition to MIL
11 10/24/2023 \$13.95; Declaration 10/26/2023 \$13.95; Proposed Voir Dire, Witness List 10/26/2023 \$13.95; Declaration
12 10/28/2023 \$128.69; Opposition to MIL 10/28/2023 \$77.21; Joint Trial Readiness Conference Report 10/28/2023 \$77.21; MIL
13 10/28/2023 \$77.21; Joint Trial Readiness Conference Report 10/28/2023 \$77.21; Proposed Voir Dire, Witness List 10/28/2023
14 \$128.69; Joint Trial Readiness Conference Report 11/3/2023 \$13.95; Trial Brief 11/6/2023 \$13.95; Trial Brief 11/14/2023
15 \$128.69; MIL 11/16/2023 \$13.95; Objections 11/28/2023 \$22.57; Objections 11/30/2023 \$51.48; Ex Parte 12/12/2023 \$15.10
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PROOF OF SERVICE

(1013A(3) Code Civ. Proc. Revised 5/1/88)

STATE OF COLORADO, COUNTY OF DENVER

I am employed in the City and County of Denver, Colorado. I am over the age of eighteen years and not a party to the within entitled action; my business address is 1550 Wewatta Street, Suite 710, Denver, CO 80202.

On February 29, 2024, I served the foregoing document described as:

MEMORANDUM OF COSTS (SUMMARY) and MEMORANDUM OF COSTS (WORKSHEET)

on the interested parties as follows:

Douglas Jaffe
LAW OFFICES OF DOUGLAS JAFFE
501 West Broadway, Suite 800
San Diego, CA 92101
T.: (619) 400-4945
F.: (619) 400-4947
E.: dougjaffelaw@gmail.com
Attorney for Defendants Razuki Investments, L.L.C. and Keith Henderson and Defendant/Cross-Complainant Salam Razuki

David K. Demergian
DEMERGIAN LAW
501 West Broadway, Suite 800
San Diego, CA 92101
T: (619) 239-3015
F: (619) 239-3029
E: david@demergianlaw.com
Attorney for Defendants/Cross-Defendants Ninus Malan, San Diego United Holdings, LLC, American Lending and Holdings, LLC

J. Scott Russo
RUSSO & DUCKWORTH, LLP
3404 Via Oporto, Suite 201
Newport Beach, CA 92663
T.: (949) 752-7106
F.: (949) 752-0629
E.: jsrusso@russoandduckworth.com
Attorney for Defendant Keith Henderson

by mail as follows: I am “readily familiar” with the firm’s practice of collecting and processing correspondence for mailing. Under that practice, it would be deposited with the U.S Postal Service on that same day with postage thereon fully prepaid at Denver, Colorado in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

by personal delivery to:

by overnight delivery via Federal Express pursuant to Code of Civil Procedure section 1013.

by email transmission [CCP §§1013(e) 1010.6(a)(6)] I caused such document to be served on this date by electronic transmission in accordance with standard procedures and to the email address listed on the attached service list.

1 [X] (STATE) I declare under penalty of perjury under the laws of the State of Colorado that the
2 above is true and correct.

3 [] (FEDERAL) I declare that I am employed in the office of a member of the bar of this Court at
4 whose direction the service was made.

5 Executed on February 29, 2024, at Denver, Colorado.



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7 _____
8 Tara Nelson, Declarant
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