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9 Attorneys for Plaintiffs  
10 SAN DIEGO PATIENTS COOPERATIVE CORPORATION, INC.;  
and BRADFORD HARCOURT  
11

12 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
13 **FOR THE COUNTY OF SAN DIEGO**

14 SAN DIEGO PATIENTS COOPERATIVE )  
15 CORPORATION, INC., a California )  
cooperative corporation, and BRADFORD )  
16 HARCOURT, an individual, )

17 Plaintiffs, )

18 v. )

19 RAZUKI INVESTMENTS, L.L.C., a )  
California limited liability company; )  
20 BALBOA AVE COOPERATIVE, a )  
California cooperative corporation; )  
21 AMERICAN LENDING AND )  
HOLDINGS, LLC, a California limited )  
22 liability company; SAN DIEGO UNITED )  
HOLDINGS GROUP, LLC, a California )  
23 limited liability company; CALIFORNIA )  
CANNABIS GROUP, a nonprofit mutual )  
24 benefit corporation; SALAM RAZUKI, an )  
individual; NINUS MALAN, an individual, )  
25 KEITH HENDERSON, an individual, AND )  
DOES 1-20, INCLUSIVE, )

26 Defendants. )  
27 )  
28 )

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego

**04/05/2024** at 08:29:00 PM

Clerk of the Superior Court  
By Nora Lopez, Deputy Clerk

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

Honorable Michael T. Smyth, Dept. C-67

**NOTICE OF JUDGMENT CREDITOR  
BRADFORD HARCOURT'S MOTION TO  
COMPEL JUDGMENT DEBTOR RAZUKI  
INVESTMENTS, LLC TO RESPOND  
FURTHER TO FIRST SET OF  
INTERROGATORIES**

Date: July 19, 2024

Time: 9:00 a.m.

Courtroom: C-67

Complaint Filed: June 7, 2017

Trial Date: October 27, 2023

**NOTICE OF JUDGMENT CREDITOR BRADFORD HARCOURT'S  
MOTION TO COMPEL JUDGMENT DEBTOR RAZUKI INVESTMENTS, LLC  
TO RESPOND FURTHER TO FIRST SET OF INTERROGATORIES**

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TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that, on July 19, 2024, at 9:00 a.m., or as soon thereafter as counsel may be heard by the Honorable Michael T. Smyth in Department C-67 of the above-entitled Court, located at Hall of Justice, Fourth Floor, 330 W. Broadway, San Diego, California 92101, judgment creditor Bradford Harcourt (“Judgment Creditor”) will, and hereby does, move the Court for an Order compelling judgment debtor Razuki Investments, LLC (“Judgment Debtor”) to provide further written responses to Judgment Creditor’s first set of interrogatories.

Further responses to Judgment Creditor’s interrogatories should be compelled because Judgment Debtor has provided no substantive response to any of the interrogatories and because Judgment Debtor’s objections to the interrogatories are without merit. In addition, Judgment Debtor and/or its counsel should be sanctioned in the total amount of \$4,246.25 for Judgment Debtor’s failure to provide substantive responses to any of Judgment Creditor’s interrogatories.

This motion is based upon this Notice of Motion; the Memorandum of Points and Authorities filed concurrently herewith; the Separate Statement filed concurrently herewith; the Declaration of Charles Cavanagh filed concurrently herewith; all the pleadings and papers on file in this action; and upon such oral argument and other matters as may be presented to the Court at the time of the hearing.

Dated: April 5, 2024

MESSNER REEVES LLP



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Allan B. Claybon  
Mark Collier  
Charles C. Cavanagh  
Attorneys for Plaintiffs

1 **PROOF OF SERVICE**

2 I am employed in the County of Denver, Colorado. I am over the age of eighteen years  
3 and not a party to the within entitled action; my business address is 1550 Wewatta Street, Suite  
4 710, Denver, Colorado 80202.

5 On April 5, 2024, I caused to be served the foregoing document described as: **NOTICE**  
6 **OF JUDGMENT CREDITOR BRADFORD HARCOURT’S MOTION TO COMPEL**  
7 **JUDGMENT DEBTOR RAZUKI INVESTMENTS, LLC TO RESPOND FURTHER TO**  
8 **FIRST SET OF INTERROGATORIES** on the interested parties as follows:  
9

10 Douglas Jaffe  
11 LAW OFFICES OF DOUGLAS JAFFE  
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17 Attorney for Defendants Razuki Investments,  
18 L.L.C. and Keith Henderson and  
19 Defendant/Cross-Complainant Salam Razuki

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20 J. Scott Russo  
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26 E.: jsrusso@russoandduckworth.com  
27 Attorney for Defendant Keith Henderson  
28

ELECTRONIC-SERVICE/E-MAIL: Pursuant to California Rules of Court, Rule 2.251(b)(1)(B), a court order or by consent/agreement of the parties to accept service by e-mail and/or electronic submission, I cause the above-referenced document(s) to be sent to the persons indicated above at the email address set forth above from either the Court’s electronic filing service or by personal email.

BY OVERNIGHT DELIVERY [CCP §1013(a)] By placing  the original  a true copy thereof enclosed in a sealed envelope(s) addressed as to the above-named counsel of record or parties in propria persona. I caused such envelope to be deposited in the Federal Express box at 11620 Wilshire Blvd., Los Angeles, CA 90025, which is regularly maintained by Federal Express, with delivery fees pre-paid and provided for, addressed to the person on whom said document is to be served.

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I declare under penalty of perjury under the laws of the State of Colorado that the forgoing is true and correct.

DATED: April 5, 2024

/s/ Tara L. Nelson  
Tara L. Nelson