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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 08:48:00 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 REQUESTS
FOR PRODUCTION**

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 REQUESTS FOR PRODUCTION**

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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 requests for production.

Further responses to Judgment Creditor’s requests for production should be compelled because Judgment Debtor has provided no substantive response to any of the requests and because Judgment Debtor’s objections to the requests 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 requests for production.

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



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:

6 **NOTICE OF JUDGMENT CREDITOR BRADFORD HARCOURT’S MOTION TO**
7 **COMPEL JUDGMENT DEBTOR RAZUKI INVESTMENTS, LLC TO RESPOND**
8 **FURTHER TO FIRST SET OF REQUESTS FOR PRODUCTION** on the interested parties
9 as follows:

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19 L.L.C. and Keith Henderson and
20 Defendant/Cross-Complainant Salam Razuki

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22 ELECTRONIC-SERVICE/E-MAIL: Pursuant to California Rules of Court, Rule
23 2.251(b)(1)(B), a court order or by consent/agreement of the parties to accept service by e-mail
24 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.

25 BY OVERNIGHT DELIVERY [CCP §1013(a)] By placing the original a true
26 copy thereof enclosed in a sealed envelope(s) addressed as to the above-named counsel of record
27 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.

