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County of San Diego
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Clerk of the Superior Court
By A. Anzalone, Deputy Clerk

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13 Attorneys for Plaintiffs
SAN DIEGO PATIENTS COOPERATIVE CORPORATION, INC.;
14 and BRADFORD HARCOURT

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **FOR THE COUNTY OF SAN DIEGO**
17

18 SAN DIEGO PATIENTS COOPERATIVE)
CORPORATION, INC., *et al.*,)

19 Plaintiffs,)

20 v.)

21 RAZUKI INVESTMENTS, L.L.C., *et al.*,)

22 Defendants.)

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

) Honorable Michael T. Smyth, Dept. C-67

) **NOTICE OF NON-OPPOSITION TO**
) **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

28 **NOTICE OF NON-OPPOSITION TO JUDGMENT CREDITOR BRADFORD HARCOURT'S**
MOTION TO COMPEL JUDGMENT DEBTOR RAZUKI INVESTMENTS, LLC
TO RESPOND FURTHER TO FIRST SET OF REQUESTS FOR PRODUCTION

1 TO THE COURT, TO ALL PARTIES, AND TO THE PARTIES' RESPECTIVE
2 ATTORNEYS OF RECORD:

3 PLEASE TAKE NOTICE that Judgment creditor Bradford Harcourt ("Judgment
4 Creditor") has not received any opposition to his motion to compel judgment debtor Razuki
5 Investments, LLC ("Judgment Debtor") to provide further, substantive responses to Judgment
6 Creditor's requests for the production of documents, which motion is set for hearing at
7 9:00 a.m. on July 19, 2024, in Department C-67 of the above-entitled court.

8 Code of Civil Procedure section 1005(b) requires parties to file and serve any opposition
9 to a motion not less than 9 court days preceding the noticed hearing date, unless the court orders
10 otherwise for good cause. Here, there has been no such court order. Accordingly, any
11 opposition to Judgment Creditor's motion was due to be filed and served by no later than July 8,
12 2024. As of July 12, 2024, Judgment Creditor has not been served with any opposition to his
13 motion to compel, and the Court's online docket does not indicate that any such opposition has
14 been filed.

15 For the foregoing reasons and for the reasons set forth in his motion, Judgment Creditor
16 respectfully requests that the Court grant his motion to compel; order Judgment Debtor to
17 provide further, substantive responses to each of Judgment Creditor's requests for production;
18 and sanction Judgment Debtor and/or its counsel in the amount of \$4,246,25.

19
20 Dated: July 12, 2024

PARK LAWLESS & TREMONTI LLP
MESSNER REEVES LLP
CHILDS MCCUNE



21
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24 Charles C. Cavanagh
Allan B. Claybon
25 Mark Collier
Attorneys for Plaintiffs
26
27
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1 **PROOF OF SERVICE**

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

5 On July 12, 2024, I caused to be served the foregoing document described as: **NOTICE**
6 **OF NON-OPPOSITION TO JUDGMENT CREDITOR BRADFORD HARCOURT’S**
7 **MOTION TO COMPEL JUDGMENT DEBTOR RAZUKI INVESTMENTS, LLC TO**
8 **RESPOND FURTHER TO FIRST SET OF REQUESTS FOR PRODUCTION** on the
9 interested parties as follows:
10

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

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26 [x] ELECTRONIC-SERVICE/E-MAIL: Pursuant to California Rules of Court, Rule
27 2.251(b)(1)(B), a court order or by consent/agreement of the parties to accept service by e-mail
28 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

1 service or by personal email.

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

4 DATED: July 12, 2024

5 /s/ Tara L. Nelson
6 Tara L. Nelson, Declarant

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