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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

8/26/2024 3:21:21 PM

Clerk of the Superior Court
By N. Lopez , Deputy Clerk

5 **MESSNER REEVES LLP**
Allan Claybon (SBN 239021)
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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**

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

**DECLARATION OF CHARLES
CAVANAGH IN SUPPORT OF
JUDGMENT CREDITOR BRADFORD
HARCOURT'S MOTION FOR
SANCTIONS AGAINST JUDGMENT
DEBTOR RAZUKI INVESTMENTS, LLC
AND ITS COUNSEL**

Date: January 17, 2025

Time: 9:00 a.m.

Courtroom: C-67

Complaint Filed: June 7, 2017

Trial Date: October 27, 2023

1 I, Charles Cavanagh, declare and state as follows:

2 1. I am a partner of the law firm of Park Lawless & Tremonti LLP, counsel of
3 record in this matter for judgment creditor Bradford Harcourt (“Judgment Creditor”). I make
4 this Declaration based upon my own personal knowledge and can testify truthfully to the facts
5 set forth herein if called to do so.

6 2. On February 14, 2024, this Court, the Honorable Eddie C. Sturgeon presiding,
7 entered a Judgment On Jury Verdict, which, among other things, entered judgment in favor of
8 Judgment Creditor and against judgment debtor Razuki Investments, LLC (“Judgment Debtor”)
9 in the amount of \$2,500,000.00.

10 3. On February 16, 2024, I caused to be served on Judgment Debtor a first set of
11 interrogatories and a first set of requests for the production of documents.

12 4. On March 20, 2024, Judgment Debtor’s counsel served on me Judgment
13 Debtor’s Responses To Interrogatories, Judgment Debtor’s Responses to Requests for
14 Production, and Judgment Debtor’s Amended Responses to Requests for Production. Each of
15 the responses consisted entirely of objections; there were no substantive responses to any of the
16 interrogatories or to any of the requests for production, and Judgment Debtor did not produce
17 any responsive documents.

18 5. On April 5, 2024, I caused to be filed with this Court Motions To Compel
19 Judgment Debtor to provide further, substantive responses to each of Judgment Creditor’s
20 interrogatories and requests for production. In connection with each of the two Motions To
21 Compel, Judgment Creditor requested sanctions in the amount of \$4,246.25. The Motions To
22 Compel were set to be heard on July 19, 2024, such that any Oppositions were to be filed by no
23 later than July 8, 2024.

24 6. When Judgment Debtor did not timely file Oppositions to either of Judgment
25 Creditor’s Motions To Compel, I caused to be filed on July 12, 2024, Notices of Non-
26 Opposition.

27 7. Thereafter, the Court allowed Judgment Debtor belatedly to file Oppositions to
28 the two Motions To Compel, and the hearing proceeded as scheduled on July 19, 2024.

1 8. Douglas Jaffe appeared for, and argued on behalf of, Judgment Debtor at the July
2 19, 2024 hearing on the Motions To Compel.

3 9. After hearing argument of counsel, the Court granted Judgment Creditor’s
4 Motions To Compel (but limited the date range of responsive information and documents to
5 June 7, 2017, to present), and imposed sanctions against Judgment Debtor in the amount of
6 \$4,246.25. The Court also expressly ordered that “[a]ll responses and production of documents
7 shall be served within 30 days of this order.” A true and correct copy of the Court’s Minute
8 Order related to the hearing on the Motions To Compel is attached hereto as **Exhibit A**.

9 10. On July 19, 2024, immediately after the hearing on the Motions To Compel, I
10 sent an email to Mr. Jaffe. In my email message, I informed Mr. Jaffe that I was “[f]ollowing
11 up on the hearing that was just completed on [Judgment Creditor’s] motions to compel Razuki
12 Investments to provide further responses to his judgment debtor discovery requests,” that I
13 would “look forward to receiving the substantive discovery responses and document production
14 from Razuki Investments by no later than August 19, 2024,” and inquiring “when we can expect
15 payment from Razuki Investments of the discovery sanctions (\$4246.25) entered against it at
16 today’s hearing.” In my email message, I also reiterated that I would stipulate to the
17 applicability and enforceability of the Protective Order entered in this action in January 2018 to
18 the judgment debtor discovery but also invited Mr. Jaffe to propose a different form of
19 Protective Order if he so preferred. A true and correct copy of my email message dated July 19,
20 2024, is included in the email chain that is attached hereto as **Exhibit B**.

21 11. I never received directly a response to my email message of July 19, 2024.

22 12. However, during the evening of August 19, 2024, my colleague, Allan Claybon,
23 forwarded to me a copy of an email message that he had received from Mr. Jaffe earlier that
24 evening. (It appears that Mr. Jaffe also sent a copy of that message to the email address I used
25 at my former firm. However, I notified Mr. Jaffe of my change of employment approximately
26 three months ago.) In its entirety, Mr. Jaffe’s August 19 email stated: “We did not waive notice
27 of entry of the Court’s Order regarding post-judgment discovery, and we have not received any
28 notice of entry. I have not received a copy of the Court’s final order. We also feel the

1 protective order needs a provision for attorneys eyes only.”

2 13. During the morning of August 20, 2024, I responded to Mr. Jaffe’s email. In my
3 email message, I reminded Mr. Jaffe that, through the email that I sent to him immediately after
4 the hearing on the Motions To Compel, I had given him notice of the Court’s Orders. I also
5 nevertheless attached to my August 20 email a formal Notice of Entry of Order. I also
6 reminded Mr. Jaffe that the Court’s Order at the hearing on the Motions To Compel was that
7 Judgment Debtor must provide its further responses and documents responsive to Judgment
8 Creditor’s discovery requests within 30 days of the date of the Order, and that the Order was not
9 conditioned either on Judgment Creditor giving formal notice of the Order or on the parties
10 entering into a new Protective Order. I therefore asked Mr. Jaffe to confirm that Judgment
11 Debtor’s responses and document production would be produced immediately and advised him
12 that, if they were not, Judgment Creditor would return to Court to demand immediate
13 compliance and to request sanctions against both Judgment Debtor and him. Finally, I asked
14 Mr. Jaffe to let me know when I could expect payment of the discovery sanctions that had
15 previously been entered against Judgment Debtor. A true and correct copy of my email
16 message dated August 20, 2024, is included in the email chain that is attached hereto as **Exhibit**
17 **B**. A true and correct copy of the Notice of Entry that I served on Mr. Jaffe is attached hereto as
18 **Exhibit C**.

19 14. On August 21, 2024, Mr. Jaffe responded to my email. In his message, Mr. Jaffe
20 neither confirmed that Judgment Debtor would comply with the Court’s prior Orders regarding
21 providing discovery responses and a document production nor stated when Judgment Debtor
22 would pay the sanctions issued against it. Instead, Mr. Jaffe implied that compliance with the
23 Court’s Orders was not necessary because he had not earlier received formal notice of the same
24 and because a new Protective Order had not been entered. A true and correct copy of Mr.
25 Jaffe’s email message dated August 21, 2024, is included in the email chain that is attached
26 hereto as **Exhibit B**.

27 15. That same morning, I responded to Mr. Jaffe, reiterating that Judgment Debtor’s
28 compliance with the Orders on the Motions To Compel was not conditioned on either formal

1 notice being given or a new Protective Order being entered. A true and correct copy of my
2 email message dated August 21, 2024, is included in the email chain that is attached hereto as
3 **Exhibit B.**

4 16. To date, I have not received any response to my email message of August 21,
5 2024, and Judgment Debtor has neither responded to Judgment Creditor's discovery requests
6 nor produced any responsive documents. To date, Judgment Debtor also has not paid any
7 portion of the \$4246.25 in discovery sanctions previously issued against it.

8 17. On August 26, 2024, I reasonably spent approximately 30 minutes reviewing the
9 file to prepare this Motion, I reasonably spent approximately 45 minutes drafting this
10 Declaration, I reasonably spent approximately 60 minutes preparing the Memorandum of Points
11 and Authorities in support of the Motion, I reasonably spent approximately 15 minutes
12 preparing the Notice of the Motion, and I reasonably spent approximately 15 minutes preparing
13 the Proposed Order granting the Motion.

14 18. I anticipate reasonably spending a total of approximately 1 hour reviewing the
15 expected Opposition to the Motion and the legal authorities cited therein, a total of
16 approximately 2 hours preparing Plaintiff's Reply Brief, and a total of approximately 1.5 hours
17 preparing for and attending the hearing on Plaintiff's Motion.

18 19. My customary and reasonable hourly rate is \$395.

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

21 Executed this 26th day of August 2024, at Loveland, Colorado.

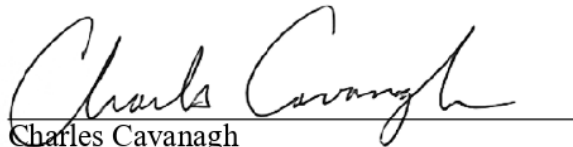
22
23 
24 Charles Cavanagh

Exhibit A

**SUPERIOR COURT OF CALIFORNIA,
COUNTY OF SAN DIEGO
CENTRAL**

MINUTE ORDER

DATE: 07/19/2024

TIME: 9:00 AM

DEPT: C-67

JUDICIAL OFFICER: MICHAEL T. SMYTH
CLERK: Herlinda Chavarin
REPORTER/ERM: Debbie Wood, CSR 6515
BAILIFF/COURT ATTENDANT:

CASE NO: **37-2017-00020661-CU-CO-CTL** CASE INIT.DATE: 06/07/2017

CASE TITLE: **San Diego Patients Cooperative Corporation Inc vs Razuki Investments LLC**

[IMAGED]

CASE CATEGORY: Civil CASE TYPE: (U)Other Contract

HEARING TYPE: Discovery Hearing
MOVING PARTY:

APPEARANCES

CHARLES C CAVANAGH, Attorney for Plaintiff(s) and Respondent on Appeal(s), present via remote video appearance.

Douglas Jaffe, Attorney for Defendant(s), Appellant(s), and Respondent on Appeal(s), present via remote video appearance.

The Court hears argument of counsel.

The Court CONFIRMS, AS MODIFIED, the tentative ruling as follows:

Plaintiff and Judgment Creditor Bradford Harcourt's unopposed Motions to Compel Further Responses to RFPs and Interrogatories are **GRANTED**. (See ROA 803, 806.) Sanctions are imposed in the amount of \$4,246.25.

"A judgment creditor may conduct discovery directly against the judgment debtor by means of a judgment debtor examination, written interrogatories, and requests for production of documents." (*SCC Acquisitions, Inc. v. Super. Ct.* (2015) 243 Cal.App.4th 741, 751-752 [citing Code of Civil Procedure sections 708.110, 708.020, and 708.030].) These demands are permitted "if the demand requests information to aid in enforcement of the money judgment." (E.g., Code Civ. Proc., § 708.030.)

On July 17, 2023, the court heard Defendant and Judgment Debtor Razuki Investments, LLC's ex parte hearing regarding the failure to oppose the motions to compel calendared for hearing on July 19, 2023. Because moving the motions to a future date would only delay the process inordinately due to the court's impacted calendar, the court decided that the motions would go forward on July 19, 2023 but it

would consider any late-filed oppositions and provide Plaintiff an opportunity to reply by oral argument at the hearing. Defendant filed his oppositions later July 17, 2023, arguing that (1) the date of the requests to before the filing of the complaint is overbroad and will not lead to information that will aid in the enforcement of the money judgment; and (2) that a protective order must be in place to protect third-party confidentiality.

First, the court finds that discovery will be required from June 7, 2017 as there appeared to be at least some compromise by Plaintiff as to that date during meet and confer. (E.g., ROA 848, Emails Attached to Jaffe Declaration, pp. 1-2 [suggesting the parties discussed moving the date].)

Second, the parties are to agree to a protective order to the degree that an existing protective order does not already apply. The court finds that Plaintiff's counsel had already so agreed. (E.g., *id.*, p. 2 ["I agreed that any information and documents that Razuki Investments provided in response to Mr. Harcourt's discovery requests could be subject to the Stipulation and Protective Order previously agreed to by the parties."].)

All responses and production of documents shall be served within 30 days of this order.

IT IS SO ORDERED:

Michael T. Smyth

Judge Michael T. Smyth

Exhibit B

Re: San Diego Patients v. Razuki Investments

Charles Cavanagh <ccavanagh@parklawless.com>

Wed 2024-08-21 7:51 AM

To: Douglas Jaffe <dougjaffelaw@gmail.com>

Cc: Mark Collier <mcollier@messner.com>; Allan Claybon <aclaybon@messner.com>; david@demergianlaw.com <david@demergianlaw.com>; jsrusso@russoandduckworth.com <jsrusso@russoandduckworth.com>

Doug:

The order to provide further responses and to produce responsive documents was not conditioned on formal notice (of the hearing which you personally attended) being given.

I'm open to considering a new/revised protective order that contains an "attorneys' eyes only" clause if you want to circulate a draft for my consideration. But the potential entry of a new/revised protective order is not an appropriate basis for failing to comply with the Court's clear Order, especially given that you have repeatedly failed to take any steps actually to draft or to circulate a proposed protective order.

Best regards,
Charles

Charles C. Cavanagh, Esq.

Park Lawless & Tremonti LLP
515 South Flower Street
18th Floor
Los Angeles, CA 90071
+1 213 640 3770
ccavanagh@parklawless.com

www.parklawless.com



Park Lawless
& Tremonti LLP

Park Lawless & Tremonti Confidentiality Notice:

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From: Douglas Jaffe <dougjaffelaw@gmail.com>

Sent: Wednesday, August 21, 2024 8:45 AM

To: Charles Cavanagh <ccavanagh@parklawless.com>

Cc: Mark Collier <mcollier@messner.com>; Allan Claybon <aclaybon@messner.com>; david@demergianlaw.com <david@demergianlaw.com>; jsrusso@russoandduckworth.com <jsrusso@russoandduckworth.com>

Subject: Re: San Diego Patients v. Razuki Investments

I am currently conducting a trial so I cannot give a full response. But a notice of entry was required and was not served until yesterday. The court's order addresses the protective order, and you have failed to respond regarding the protective order being amended to include an attorneys eyes only provision.

Douglas Jaffe, Esq.

501 West Broadway

Suite 800

San Diego, CA 92101

(619) 400-4945

On Aug 20, 2024, at 10:11 AM, Charles Cavanagh <ccavanagh@parklawless.com> wrote:

Doug:

Allan sent me a copy of the email that you sent to him after-hours last night. It appears you also sent a copy to my old email address at my former firm. As you know, I moved firms, and filed and served notice of that move, a few months ago. Please be sure to direct all future communications to the current contact information that you have for Mark and me.

In your email, you contend that you had not received notice of the Court's Order regarding Mr. Harcourt's motions to compel further responses to his post-judgment discovery requests. That assertion is false. In addition to the fact that you were personally present at the hearing, my post-hearing email (below) provided adequate notice of the Court's rulings. To the extent that you think that it was not, I am also serving herewith a Notice of Entry of Order.

In any event, as you are aware, and as is spelled out in the Order, Razuki Investments was ordered to provide further responses and its document production within 30 days of the date of the Order. Compliance was not conditioned on notice of the order being given. Razuki Investments' further responses and document production are now overdue. Please confirm that they will be produced immediately. If I have not received further substantive responses and an appropriate document production by the end of this week, and if I have not agreed to some other arrangement by that time, I will return to Court on an ex parte basis, to notify the Court of the non-compliance, to demand immediate production of the further responses and document production, and to request sanctions against both you and your client for your willful disobedience of the Court's Order.

To the extent that you may contend that Razuki Investments has not complied with the Court's Order because a new or revised protective order has not been entered: First, the Court did not condition your client's compliance with the Order on the entry of a protective order. Second, as I have repeatedly told you both before and after the hearing on the motions to compel, my clients are willing to stipulate to the continued applicability and enforceability of the protective order previously entered by Judge Sturgeon. To the extent that you or your client believe that a different

protective order is necessary, I would be willing to consider any draft protective order that you may want to submit for my consideration, but I do not agree that you and your clients may continue to refuse to respond to Mr. Harcourt's proper discovery requests while such a protective order is being negotiated.

Finally, please also let me know when we can expect payment from Razuki Investments of the discovery sanctions that have already been entered against it.

Best regards,
Charles

Charles C. Cavanagh, Esq.

Park Lawless & Tremonti LLP
515 South Flower Street
18th Floor
Los Angeles, CA 90071
+1 213 640 3770
ccavanagh@parklawless.com

www.parklawless.com

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From: Charles Cavanagh <ccavanagh@parklawless.com>

Sent: Friday, July 19, 2024 10:38 AM

To: Douglas Jaffe <dougjaffelaw@gmail.com>

Cc: Mark Collier <mcollier@messner.com>; Allan Claybon <aclaybon@messner.com>

Subject: San Diego Patients v. Razuki Investments

Doug:

Following up on the hearing that was just completed on Mr. Harcourt's motions to compel Razuki Investments to provide further responses to his judgment debtor discovery requests, I am writing regarding the protective order that will govern those further discovery responses. As I have told you before, and as I reiterated during today's hearing, I believe that the Protective Order to which our clients agreed in January 2018 remains in full force and effect, applies to the judgment debtor discovery, and is sufficient to address any privacy/confidentiality concerns of Razuki Investments. If you have any doubt regarding the applicability of that January 2018 Protective Order to the judgment debtor discovery, I hereby stipulate that it does apply. If you nevertheless believe that

the January 2018 Protective Order is insufficient to address your client's concerns, please submit to me as soon as possible for my consideration a proposed alternative Protective Order.

In any event, we will look forward to receiving the substantive discovery responses and document production from Razuki Investments by no later than August 19, 2024.

Please also let me know when we can expect payment from Razuki Investments of the discovery sanctions (\$4246.25) entered against it at today's hearing.

Best regards,
Charles

Charles C. Cavanagh, Esq.

Park Lawless & Tremonti LLP
515 South Flower Street
18th Floor
Los Angeles, CA 90071
+1 213 640 3770
ccavanagh@parklawless.com

www.parklawless.com

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<SDPCC - Notice of Entry of Order re MTCs.pdf>

Exhibit C

1 PARK LAWLESS & TREMONTI LLP
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5 MESSNER REEVES LLP
Allan Claybon (SBN 239021)
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8 E-mail: aclaybon@messner.com

9 CHILDS MCCUNE
Mark Collier (*Pro Hac Vice*)
10 821 17th Street, Suite 500
Denver, CO 80202
11 Telephone: (303) 296-7300
Facsimile: (720) 625-3637
12 E-mail: mcollier@childsmccune.com

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

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

18 SAN DIEGO PATIENTS COOPERATIVE) Case No. 37-2017-00020661-CU-CO-CTL
CORPORATION, INC., *et al.*,)
19 Plaintiffs,) Honorable Michael T. Smyth, Dept. C-67
20 v.) **NOTICE OF ENTRY OF ORDER**
21 RAZUKI INVESTMENTS, L.L.C., *et al.*,) Date: July 19, 2024
22 Defendants.) Time: 9:00 a.m.
23) Courtroom: C-67
24) Complaint Filed: June 7, 2017
25) Trial Date: October 27, 2023
26)
27)
28)

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TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that, on July 19, 2024, the Honorable Michael T. Smyth entered a Minute Order, granting the motions of Plaintiff/Judgment Creditor Bradford Harcourt to compel further responses to his judgment debtor discovery requests; ordering Defendant/Judgment Debtor Razuki Investments, LLC to serve further responses and to produce responsive documents within 30 days of that Minute Order; and imposing sanctions against Defendant/Judgment Debtor Razuki Investments, LLC in the amount of \$4246.25.

A true and correct copy of the Court’s Minute Order is attached hereto.

Dated: August 20, 2024

PARK LAWLESS & TREMONTI LLP
MESSNER REEVES LLP
CHILDS MCCUNE



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

**SUPERIOR COURT OF CALIFORNIA,
COUNTY OF SAN DIEGO
CENTRAL**

MINUTE ORDER

DATE: 07/19/2024

TIME: 9:00 AM

DEPT: C-67

JUDICIAL OFFICER: MICHAEL T. SMYTH
CLERK: Herlinda Chavarin
REPORTER/ERM: Debbie Wood, CSR 6515
BAILIFF/COURT ATTENDANT:

CASE NO: **37-2017-00020661-CU-CO-CTL** CASE INIT.DATE: 06/07/2017

CASE TITLE: **San Diego Patients Cooperative Corporation Inc vs Razuki Investments LLC**

[IMAGED]

CASE CATEGORY: Civil CASE TYPE: (U)Other Contract

HEARING TYPE: Discovery Hearing
MOVING PARTY:

APPEARANCES

CHARLES C CAVANAGH, Attorney for Plaintiff(s) and Respondent on Appeal(s), present via remote video appearance.

Douglas Jaffe, Attorney for Defendant(s), Appellant(s), and Respondent on Appeal(s), present via remote video appearance.

The Court hears argument of counsel.

The Court CONFIRMS, AS MODIFIED, the tentative ruling as follows:

Plaintiff and Judgment Creditor Bradford Harcourt's unopposed Motions to Compel Further Responses to RFPs and Interrogatories are **GRANTED**. (See ROA 803, 806.) Sanctions are imposed in the amount of \$4,246.25.

"A judgment creditor may conduct discovery directly against the judgment debtor by means of a judgment debtor examination, written interrogatories, and requests for production of documents." (*SCC Acquisitions, Inc. v. Super. Ct.* (2015) 243 Cal.App.4th 741, 751-752 [citing Code of Civil Procedure sections 708.110, 708.020, and 708.030].) These demands are permitted "if the demand requests information to aid in enforcement of the money judgment." (E.g., Code Civ. Proc., § 708.030.)

On July 17, 2023, the court heard Defendant and Judgment Debtor Razuki Investments, LLC's ex parte hearing regarding the failure to oppose the motions to compel calendared for hearing on July 19, 2023. Because moving the motions to a future date would only delay the process inordinately due to the court's impacted calendar, the court decided that the motions would go forward on July 19, 2023 but it

would consider any late-filed oppositions and provide Plaintiff an opportunity to reply by oral argument at the hearing. Defendant filed his oppositions later July 17, 2023, arguing that (1) the date of the requests to before the filing of the complaint is overbroad and will not lead to information that will aid in the enforcement of the money judgment; and (2) that a protective order must be in place to protect third-party confidentiality.

First, the court finds that discovery will be required from June 7, 2017 as there appeared to be at least some compromise by Plaintiff as to that date during meet and confer. (E.g., ROA 848, Emails Attached to Jaffe Declaration, pp. 1-2 [suggesting the parties discussed moving the date].)

Second, the parties are to agree to a protective order to the degree that an existing protective order does not already apply. The court finds that Plaintiff's counsel had already so agreed. (E.g., *id.*, p. 2 ["I agreed that any information and documents that Razuki Investments provided in response to Mr. Harcourt's discovery requests could be subject to the Stipulation and Protective Order previously agreed to by the parties."].)

All responses and production of documents shall be served within 30 days of this order.

IT IS SO ORDERED:

Michael T. Smyth

Judge Michael T. Smyth

1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, California. I am over the age of eighteen
3 years and not a party to the within entitled action; my business address is 515 South Flower
4 Street, 18th Floor, Los Angeles, CA 90071.

5 On August 20, 2024, I caused to be served the foregoing document described as:

6 **NOTICE OF ENTRY OF ORDER** on the interested parties as follows:

7 Douglas Jaffe
8 LAW OFFICES OF DOUGLAS JAFFE
9 501 West Broadway, Suite 800
10 San Diego, CA 92101
11 T.: (619) 400-4945
12 F.: (619) 400-4947
13 E.: dougjaffelaw@gmail.com
14 Attorney for Defendants Razuki Investments,
15 L.L.C. and Keith Henderson and
16 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

13 J. Scott Russo
14 RUSSO & DUCKWORTH, LLP
15 3404 Via Oporto, Suite 201
16 Newport Beach, CA 92663
17 T.: (949) 752-7106
18 F.: (949) 752-0629
19 E.: jsrusso@russoandduckworth.com
20 Attorney for Defendant Keith Henderson

21 [x] ELECTRONIC-SERVICE/E-MAIL: Pursuant to California Rules of Court, Rule
22 2.251(b)(1)(B), a court order or by consent/agreement of the parties to accept service by e-mail
23 and/or electronic submission, I cause the above-referenced document(s) to be sent to the persons
24 indicated above at the email address set forth above from either the Court’s electronic filing
25 service or by personal email.

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

28 DATED: August 20, 2024



1 **PROOF OF SERVICE**

2 I am employed in the County of Los Angeles, California. I am over the age of eighteen
3 years and not a party to the within entitled action; my business address is 515 South Flower
4 Street, 18th Floor, Los Angeles, CA 90071.

5 On August 26, 2024, I caused to be served the foregoing document described as:

6 **DECLARATION OF CHARLES CAVANAGH IN SUPPORT OF JUDGMENT**

7 **CREDITOR BRADFORD HARCOURT’S MOTION FOR SANCTIONS AGAINST**

8 **JUDGMENT DEBTOR RAZUKI INVESTMENTS, LLC AND ITS COUNSEL** on the

9 interested parties as follows:
10

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19 L.L.C. and Keith Henderson and
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21 [x] ELECTRONIC-SERVICE/E-MAIL: Pursuant to California Rules of Court, Rule
22 2.251(b)(1)(B), a court order or by consent/agreement of the parties to accept service by e-mail
23 and/or electronic submission, I cause the above-referenced document(s) to be sent to the persons
24 indicated above at the email address set forth above from either the Court’s electronic filing
25 service or by personal email.

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

26 DATED: August 26, 2024

27 
Paulina J. Resendez