

1 PARK LAWLESS & TREMONTI LLP
Charles C. Cavanagh (SBN 198468)
2 515 South Flower Street, 18th Floor
Los Angeles, CA 90071
3 Telephone: (213) 640-3770
Facsimile: (213) 640-3015
4 E-mail: ccavanagh@parklawless.com

5 MESSNER REEVES LLP
Allan Claybon (SBN 239021)
6 611 Anton Boulevard, Suite 450
Costa Mesa, CA 92626
7 Telephone: (949) 612-9128
Facsimile: (949) 438-2304
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 **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.)
23)

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

Honorable Michael T. Smyth, Dept. C-67

24) **NOTICE OF JUDGMENT CREDITOR**
25) **BRADFORD HARCOURT'S MOTION**
26) **FOR SANCTIONS AGAINST JUDGMENT**
27) **DEBTOR RAZUKI INVESTMENTS, LLC**
28) **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

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

TO ALL PARTIES AND THEIR RESPECTIVE ATTORNEYS OF RECORD:

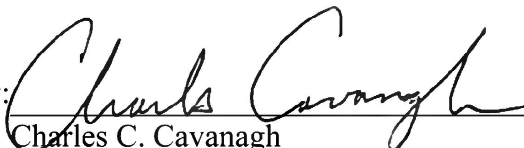
NOTICE IS HEREBY GIVEN that, on January 17, 2025, at 9:00 a.m., or as soon thereafter as counsel may be heard by the Honorable Michael T. Smyth in Department C-67 of the above-entitled Court, located at Hall of Justice, Fourth Floor, 330 W. Broadway, San Diego, California 92101, Judgment Creditor Bradford Harcourt (“Judgment Creditor”) will, and hereby does, move the Court for an Order sanctioning Judgment Debtor Razuki Investments, LLC (“Judgment Debtor”) and its counsel, Douglas Jaffe, for their disobedience of the Court’s prior Order compelling them to respond to Judgment Creditor’s discovery requests and to pay monetary sanctions. Judgment Creditor will also request Judgment Debtor’s immediate compliance with the Minute Order entered by this Court on July 19, 2024.

Judgment Debtor and Mr. Jaffe should be found in contempt, and further monetary sanctions should be imposed, because each of them has willfully disobeyed the Court’s Order compelling Judgment Debtor to respond to Judgment Creditor’s interrogatories and requests for production and to pay Judgment Creditor sanctions in the amount of \$4,246.25. Specifically, Judgment Debtor and Mr. Jaffe have failed to comply with the Court’s Order dated July 19, 2024, that “[a]ll responses and production of documents shall be served within 30 days of this order.”

This motion is based upon this Notice of Motion and Motion; the Memorandum of Points and Authorities 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: August 26, 2024

PARK LAWLESS & TREMONTI LLP
MESSNER REEVES LLP
CHILDS MCCUNE

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

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 **NOTICE OF JUDGMENT CREDITOR BRADFORD HARCOURT’S MOTION FOR**
7 **SANCTIONS AGAINST JUDGMENT DEBTOR RAZUKI INVESTMENTS, LLC AND**
8 **ITS COUNSEL** on the interested parties as follows:

9
10 Douglas Jaffe
11 LAW OFFICES OF DOUGLAS JAFFE
12 501 West Broadway, Suite 800
13 San Diego, CA 92101
14 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

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

19
20 [x] ELECTRONIC-SERVICE/E-MAIL: Pursuant to California Rules of Court, Rule
21 2.251(b)(1)(B), a court order or by consent/agreement of the parties to accept service by e-mail
22 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.

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

25 DATED: August 26, 2024

26 
Paulina J. Resendez