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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
04/18/2018 at 09:44:00 AM
Clerk of the Superior Court
By Katelin O'Keefe, Deputy Clerk

10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
11 **COUNTY OF SAN DIEGO**

12 **KARL BECK**, individually and on behalf of all
13 other similarly situated California residents,

14 Plaintiff,

15 v.

16 **POINT LOMA PATIENTS CONSUMER COOPERATIVE CORPORATION**, A
17 California Corporation, **ADAM KNOPF**, an
18 Individual, **JUSTUS H. HENKES IV**, an
19 Individual, **419 CONSULTING INC.**, a
20 California Corporation, **GOLDEN STATE
GREENS LLC**, a California LLC, **FAR WEST
MANAGEMENT, LLC**, a California LLC,
21 **FAR WEST OPERATING, LLC**, a California
22 LLC, **FAR WEST STAFFING, LLC**, a
23 California LLC, and **DOES 1-50**,

24 Defendants.

Case No: 37-2017-00037524-CU-BT-CTL

CLASS ACTION

**NOTICE OF MOTION AND MOTION TO
COMPEL REQUEST FOR PRODUCTION
(SET ONE)**

Date: May 18, 2018

Time: 9:00 a.m.

Judge: Hon. Joel R. Wohlfeil

Ctrm: C-73

1 **TO: THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD**

2 PLEASE TAKE NOTICE that on May 18, 2018 at 9:00 a.m. in Department C-73 of the
3 San Diego Superior Court located at 330 West Broadway, San Diego, California 92101, the
4 Honorable Joel R. Wohlfeil presiding, plaintiff Karl Beck (“Plaintiff”) will, and hereby does, move
5 pursuant to California Code of Civil Procedure § 2031.310 for an Order:

6 (1) Compelling Defendant Point Loma Patients Consumer Cooperative Corporation to
7 respond to Requests two (2) through seven (7) from Plaintiff’s Requests for Production (Set One),
8 as amended through meet and confer, within 14 days;

9 (2) Compelling Defendants Adam Knopf and Justus H. Henkes IV to respond to
10 Requests one (1) through seven (7), and nine (9) through ten (10) from Plaintiff’s Requests for
11 Production (Set One), as amended through meet and confer, within 14 days;

12 (3) Compelling Defendants 419 Consulting, Inc., Golden State Greens LLC, Far West
13 Management, LLC, Far West Operating, LLC, and Far West Staffing, LLC to respond to Requests
14 one (1) through seven (7), and nine (9) through eleven (11) from Plaintiff’s Requests for Production
15 (Set One), as amended through meet and confer, within 14 days; and

16 (4) Compelling Defendants to produce all documents and electronic data responsive to
17 the above Requests within 14 days after service of further responses.

18 This Motion is based on this Notice of Motion and Motion, the grounds more fully
19 described in the accompanying Memorandum of Points and Authorities, Plaintiff’s Separate
20 Statement, the Declaration of William R. Restis and exhibits in support hereof, all filed
21 concurrently herewith.

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1 Plaintiff's Motion will also be based upon the pleadings and materials in the Court's files
2 on this proceeding, oral argument of counsel and such other matters as may be brought to the
3 Court's attention at the hearing on the Motion.

4
5 DATED: April 18, 2018
6

Respectfully submitted,

THE RESTIS LAW FIRM, P.C.

7 /s/ William R. Restis

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