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9 [Additional Counsel Listed On Signature Page]

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego  
**05/21/2018** at 07:01:00 AM  
Clerk of the Superior Court  
By Vanessa Bahena, Deputy Clerk

10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**

11 **COUNTY OF SAN DIEGO**

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

13 Plaintiff,

14 v.

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

21 Defendants.

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

12 **CLASS ACTION**

13 **NOTICE OF WITHDRAWAL**  
14 **OF PLAINTIFF'S REQUESTS**  
15 **FOR PRODUCTION (SET TWO)**

16 **RE: DEFENDANTS' JOINT MOTION**  
17 **FOR PROTECTIVE ORDER (RoA # 96)**

18 Date: May 24, 2018

19 Time: 9:00 a.m.

20 Judge: Hon. Joel R. Wohlfeil

21 Ctrm: C-73

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

2 **PLEASE TAKE NOTICE** that pursuant to the Court's directives at the May 18, 2018  
3 hearing concerning the potential overbreadth of Plaintiff's Requests for Production (Set One),  
4 Plaintiff has withdrawn without prejudice Plaintiff's Request for Production (Set Two) to all  
5 Defendants. *See* Exhibit A hereto (Restis letter withdrawing); Opposition to Motion for Protective  
6 Order, RoA # 148, at pp 3-4 (describing Set Two).

7 Respectfully submitted,

8  
9 DATED: May 21, 2018

THE RESTIS LAW FIRM, P.C.

10 /s/ William R. Restis

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24 **DECLARATION OF WILLIAM R. RESTIS**

25 1. I, William R. Restis, hereby declare as follows: 1. I am the managing member of The  
26 Restis Law Firm, P.C. I have personal knowledge of the matters set forth herein, based on my active  
27 participation in all material aspects of this litigation. If called upon, I could and would testify  
28 competently to the facts herein based upon my personal involvement in this case.



# **EXHIBIT A**



May 21, 2018

*Via Electronic Mail*

Tamara Leetham  
AUSTIN LEGAL GROUP, APC  
3990 Old Town Ave, Suite A112  
San Diego, 92110  
tamara@austinlegalgroup.com

*Re: Withdrawal of Plaintiff's Request for Production to all Defendants (Set Two)*

Dear Tammy and Matt,

Following the Court's admonishment at the May 18<sup>th</sup> hearing that certain of Plaintiff's Request for Production (Set One) are overbroad, we hereby withdraw without prejudice Plaintiff's Request for Production (Set Two) to all Defendants. This is because Set Two contains the same or similar boilerplate that the Court found to be objectionable.

Plaintiff intends to revise and narrow Set Two to address our understanding of the Court's concerns.

Sincerely,



William R. Restis, Esq.

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william@restislaw.com

Cc: Jeffrey R. Krinsk, Esq.  
Matthew Dart, Esq.

