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Point Loma Patients Consumer Cooperative,
7 Golden State Greens, LLC, Far West Management, LLC
Far West Operating, LLC, and Far West Staffing, LLC

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DART LAW

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12 Attorneys for Defendants 419 Consulting,
Adam Knopf, and Justus Henkes IV

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **COUNTY OF SAN DIEGO**

15
16 KARL BECK, individually and on behalf
17 of all other similarly situated California
residents,

18 Plaintiff,

19 vs.

20 POINT LOMA PATIENTS CONSUMER
21 COOPERATIVE CORPORATION, a
California corporation, ADAM KNOPF, an
22 individual, JUSTUS H. HENKES IV, an
individual, 419 CONSULTING INC, a
23 California corporation, GOLDEN STATE
GREENS LLC, a California LLC, FAR
24 WEST MANAGEMENT LLC, a
California LLC, FAR WEST
25 OPERATING, LLC, a California LLC,
FAR WEST STAFFING LLC, a California
26 LLC, and DOES 1-50;

27 Defendants.
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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
04/04/2018 at 05:08:00 PM
Clerk of the Superior Court
By Katelin O'Keefe, Deputy Clerk

CASE NO. 37-2017-00037524-CU-BT-CTL

**DEFENDANTS' JOINT NOTICE OF
MOTION AND MOTION FOR
PROTECTIVE ORDER**

Judge: Hon. Joel Wohlfeil
Dept.: 73
Date: May 24, 2018
Time: 9:00 a.m.

Complaint Filed: October 6, 2017
Trial Date: March 1, 2019

1 TO PLAINTIFF KARL BECK AND HIS ATTORNEYS OF RECORD:

2 PLEASE TAKE NOTICE that on May 24, 2018 at 9:00 a.m., or as soon thereafter as the
3 matter may be heard, in Department 73 of the San Diego County Superior Court located at 330
4 West Broadway, San Diego, California 92101, defendants Point Loma Patients Consumer
5 Cooperative Corporation (“PLPCC”), Adam Knopf, Justus H. Henkes IV, 419 Consulting, Inc.,
6 Golden State Greens LLC, Far West Management LLC, Far West Operating LLC, and Far West
7 Staffing LLC (“Defendants”) will, and hereby do, move for a protective order that certain
8 confidential, private, privileged, and overbroad information not be produced and for an order
9 restricting discovery. Defendants seek a protective order on the following discovery requests:

10 PLPCC: (i) Special Interrogatories, Set Two; (ii) Request for Production of Documents,
11 Set Two; (iii) Request for Production of Documents, Set Three; (iv) Special Interrogatories, Set
12 Three.

13 Far West Operating/Management/Staffing, Golden State Greens, and 419 Consulting: (i)
14 Special Interrogatories, Set Two; (ii) Request for Production of Documents, Set Two.

15 Adam Knopf and Justus Henkes: (i) Request for Production of Documents, Set Two; (ii)
16 Request for Production of Documents, Set Two.

17 Specifically, Defendants seek an order that protects privileged, confidential or personal
18 information (including financial, commercially sensitive information, employment information,
19 and private medical or healthcare information) from disclosure and permitting redaction of that
20 information from documents that may be ordered produced. Defendants also seek an order
21 prohibiting certain discovery as oppressive, cumulative, or unduly burdensome.

22 This motion is made following the parties ongoing meet and confer efforts.

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1 This motion will be based on this Notice of Motion and Motion, the Memorandum Of
2 Points & Authorities, the Declaration of Matthew Dart, the Declaration of Tamara Leetham, the
3 Declaration of Richard Andrews, the Declaration of Gina Austin, the papers and records on file
4 herein, those matters of which the Court must or may take judicial notice, and such other and
5 further evidence as may be presented at the time of the hearing.

6
7 Dated: April 4, 2018

DART LAW

8
9 By



MATTHEW B. DART
Attorney for Defendants 419 Consulting,
Inc., Adam Knopf and Justus Henkes

10
11 Dated: April 4, 2018

AUSTIN LEGAL GROUP, APC

12
13 By



Gina M. Austin/Tamara Leetham,
Attorneys for Point Loma Patients
Consumer Cooperative Corporation,
Golden State Greens, LLC, Far West
Management, LLC, Far West Operating,
LLC, and Far West Staffing, LLC