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Clerk of the Superior Court

MAY 1 3 2011

By: A. SEAMONS, Deputy

Attorney for Plaintiffs

SUPERIOR COURT OF THE STATE OF CALIFORNIA FOR THE COUNTY OF SAN DIEGO

John Dorman, Individually, and Joel Gamboa, Individually,

Plaintiffs,

Vs.

Defendant Doe 1, La Jolla Church; Defendant Doe 2, Linda Vista Church; Defendant Doe 3, Supervisory Organization; Defendant Doe 4, Perpetrator; and Does 5 through 100,

Defendants.

Case No: 37-2010-00092450-CU-PO-CTL

NOTICE OF LODGMENT IN SUPPORT OF PLAINTIFFS' REPLY TO MOTION TO COMPEL FURTHER DOCUMENTS FROM DEFENDANTS

Date: 5-20-11 Time: 9:00 a.m.

Judge: Steven R. Denton

Dept: C-73

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NOTICE OF LODGMENT IN SUPPORT OF PLAINTIFFS' REPLY TO MOTION TO COMPEL FURTHER DOCUMENTS FROM DEFENDANTS

1	Plaintiffs hereby lodge the following documents with their Reply in Support of Plaintiffs' Motion to	
2	Compel Furt	ther Responses to Request for Production of Documents:
3	Exhibit 1:	True and correct copy of the Notice of Disfellowshipping of the Perpetrator; a certified
4		Spanish to English Translation of the original document; and a certificate of the authenticity
5		of the translation.
6	Exhibit 2:	Pages 42-50 of the deposition of Juan Guardado taken in this litigation.
7	Exhibit 3:	Pages 35-40 of the deposition of Dennis Palmer, taken in this litigation.
8	Exhibit 4:	An order dated September 29, 2005, in the matter of Charissa W., et al. v. Watchtower Bible
9		and Tract Society of New York, et al., Judicial Council Coordinated Proceeding Case Number
10		4374.
11	Exhibit 5:	An order issued by Division 3 of the Fist District Court of Appeal denying the Petition for
12		Writ of Mandate filed by the Watchtower Bible and Tract Society of New York following the
13		issuance of the order attached as Plaintiffs' Exhibit 4 in Appellate Case Number A114329.
14	Exhibit 6:	A copy of the Petition for Writ of Mandate filed by the Watchtower Bible and Tract Society
15		of New York following the issuance of the order attached as Plaintiffs' Exhibit 4
16		Respectfully Submitted,
17		THE ZALKIN LAW FIRM, P.C.
18		$\mathcal{D}_{\mathcal{I}}$
19	Dated:	13/11 // Stoce
20		Devin M. Storey Attorney for Plaintiffs
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FILED

Clerk of the Superior Court

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PROOF OF SERVICE

MAY 1 3 2011

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Attorney for Plaintiffs

By: A. SEAMONS, Deputy

I, Lisa E. Maynes, am employed in the city and county of San Diego, State of California. I am over the age of 18 and no a party to the action; my business address is 12555 High Bluff Drive, Suite 260, San Diego, CA 92130.

On May 13, 2011, I caused to be served:

PLAINTIFFS' NOTICE OF LODGMENT IN SUPPORT OF REPLY TO MOTION TO COMPEL FURTHER DOCUMENTS FROM DEFENDANTS

in this action by placing a true and correct copy of said documents(s) in sealed envelopes addressed as follows:

SEE ATTACHED SERVICE LIST

(BY MAIL) I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Diego, California, in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

_X__ (BY PERSON SERVICE) By causing to be delivered by hand to the offices of the addressee(s).

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

Dated: 5-13-11

Lisa E. Maynes

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1	MAIL INC LICT
2	MAILING LIST
3	James M. McCabe, Esq. The McCabe Law Firm, APC
4	4817 Santa Monica Avenue, Suite B San Diego, CA 92107 Tel: 619-224-2848
5	L Fax: 619-224-0089
6	email: jim@mccabelaw.net Attorneys for Defendants Defendant Doe 1, La Jolla Spanish Congregation Defendant Doe 2, Linda Vista Spanish Congregation Defendant Doe 3, Watchtower Bible & Tract Society of New York
7	Defendant Doe 1, La Jolla Spanish Congregation Defendant Doe 2, Linda Vista Spanish Congregation
8	Defendant Doe 3, Watchtower Bible & Tract Society of New Y
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