

1 Patrik Griego, Esq. CSB#194216
2 JANSSEN MALLOY LLP
3 730 Fifth Street
4 Eureka, CA 95501
5 Telephone: (707) 445-2071
6 Facsimile: (707) 445-8305

7 Attorneys for Petitioners

FILED

MAR 17 2017

**SUPERIOR COURT OF CALIFORNIA
COUNTY OF HUMBOLDT**

8 **SUPERIOR COURT OF CALIFORNIA**
9 **COUNTY OF HUMBOLDT**

10 DOES 1 through 10,

11 Petitioners,

12 v.

13 COUNTY OF HUMBOLDT;
14 HUMBOLDT COUNTY BOARD OF
15 SUPERVISORS; and DOES 1 through
16 50,

17 Respondents.

Case No. CV 170183

**DECLARATION OF PATRIK
GRIEGO, ESQ. ISO PETITIONERS'
MOTION TO PERMIT SERVICE OF
BUSINESS RECORD SUBPOENA
PRIOR TO 20 DAY HOLD**

DATE: March 24, 2017

TIME: 8:30 a.m.

DEPT: Six (6)

TRIAL DATE: None set.

19 I, Patrik Griego, Esq., hereby declare:

20 1. I am a partner with the firm Janssen Malloy LLP, counsel for Petitioner(s)
21 DOES 1 through 10, in the above-entitled action. I make this Declaration in support of
22 Petitioners' Motion to Permit Service of Business Record Subpoena Prior to 20-day
23 Hold. I have personal knowledge of the facts set forth herein, and if called to testify, I
24 could and would competently testify thereto.

25 2. On March 13, 2017, our office served a copy of the Summons on the Clerk
26 of the Board of Supervisors, on behalf of the County of Humboldt and Humboldt County
27 Board of Supervisors, as required.
28

3. Attached as **Exhibit 1** is a true and correct copy of the subpoena that Petitioner intends to serve upon Mr. Marcus.

4. Attached as **Exhibit 2** is a true and correct copy of the subpoena that Petitioner intends to serve upon the law firm of Cella, Lange, and Cella, after providing sufficient notice to the consumer, Mr. Marcus.

5. On March 15, 2017, County Counsel agreed to accept service on behalf of the defendants, and therefore our office served County Counsel with courtesy copies of the subpoenas and the Notice to Consumer which was previously served upon David Marcus. (Please see **Exhibit 3** attached hereto.)

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

Executed this 17th day of ~~March~~, 2017, in Eureka, California.

By: Patrik Griego, Declarant

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Patrik Griego SBN: 194216 JANSSEN MALLOY LLP 730 Fifth Street, P.O. Box 1288, Eureka, CA 95502 TELEPHONE NO. 707-445-2071 FAX NO. 707-445-8305 E-MAIL ADDRESS pgriego@janssenlaw.com ATTORNEY FOR (Name): DOES 1 through 10	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF HUMBOLDT STREET ADDRESS: 825 Fifth Street MAILING ADDRESS: 825 Fifth Street CITY AND ZIP CODE: Eureka, 95501 BRANCH NAME: Humboldt County Courthouse	
PLAINTIFF/PETITIONER: Does 1 through 10 DEFENDANT/RESPONDENT: County of Humboldt, et al.	
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS	CASE NUMBER: CV170183

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 David Marcus telephone number: (707) 445.7634
 1001 Fourth St. Eureka, CA 95501

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer): Patrik Griego, Esq.
 On (date): April __, 2017 At (time): 10:00 a.m.
 Location (address): Janssen Malloy LLP, 730 Fifth Street, Eureka, CA 95501

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. ☒ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b. ☐ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c. ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified): See Attachment 3.

☒ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: March __, 2017

Patrik Griego

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for DOES 1 through 10

(Proof of service on reverse)

(TITLE)

Page 1 of 2

PLAINTIFF/PETITIONER: Does I through 10	CASE NUMBER: CV170183
DEFENDANT/RESPONDENT: County of Humboldt, et al.	

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (*name*): David Marcus

b. Address where served: 1600 S. Main St, Ste 180, Walnut Creek, CA 94596

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.
Amount: \$ _____

(2) ☐ Copying fees were paid.
Amount: \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

- a. ☐ Not a registered California process server.
- b. ☐ California sheriff or marshal.
- c. ☐ Registered California process server.
- d. ☐ Employee or independent contractor of a registered California process server.
- e. ☐ Exempt from registration under Business and Professions Code section 22350(b).
- f. ☐ Registered professional photocopier.
- g. ☐ Exempt from registration under Business and Professions Code section 22451.
- h. Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:

(SIGNATURE)

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

Attachment 3 to Deposition Subpoena for Production of Business Records

DOES 1 through 10 v. County of Humboldt, et al.
Humboldt County Superior Court Case No. CV170183

Definitions:

DOCUMENT or DOCUMENTS mean a "Writing" as broadly defined in California Evidence Code §250, as follows: "handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, texting, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored."

Please provide the following documents regarding employment of David Marcus by Cella, Lange, and Cella or Cella, Lange, and Cella, LLP. For each request the responding party can redact for names and addresses for clients and we are not seeking work-product:

1. Please provide all DOCUMENTS regarding payments made by Cella, Lange, and Cella or Cella, Lange, and Cella, LLP to Mr. Marcus from February 7, 2016 through February 7, 2017 for legal work performed by Mr. Marcus. This should include, but not be limited to, W-2 Forms.
2. Please provide all DOCUMENTS reflecting any court appearances in California made by Mr. Marcus from February 7, 2016 through February 7, 2017.
3. Please provide all DOCUMENTS reflecting the number of hours Mr. Marcus worked for Cella, Lange, and Cella or Cella, Lange, and Cella LLP from February 7, 2016 through February 7, 2017.
4. Please provide all DOCUMENTS reflecting correspondence between Mr. Marcus and Cella, Lange, and Cella or Cella, Lange, and Cella, LLP regarding his employment between February 7, 2016 through February 7, 2017.
5. Please provide all DOCUMENTS reflecting correspondence with the County of Humboldt or its representatives and investigators regarding Mr. Marcus' employment at Cella, Lange, and Cella or Cella, Lange, and Cella, LLP.
6. Please provide all DOCUMENTS reflecting the number of hours Mr. Marcus performed legal work for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP and when that work took place during the time period between February 7, 2016 through February 7, 2017.
7. Please provide all DOCUMENTS reflecting the type of legal work Mr. Marcus performed for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP between February 7, 2016 through February 7, 2017.

8. Please provide all DOCUMENTS reflecting the venue of cases for which Mr. Marcus performed legal work for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP between February 7, 2016 through February 7, 2017.
9. Please provide all DOCUMENTS reflecting the geographical location of clients for whom Mr. Marcus performed legal work for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP from February 7, 2016 through February 7, 2017. For purposes of this request, as with all requests, any client names and street addresses can be redacted but information regarding the State should remain.
10. Please provide all DOCUMENTS reflecting contact between Mr. Marcus and clients of Cella, Lange, and Cella or Cella, Lange, and Cella LLP from February 7, 2016 through February 7, 2017.
11. Please provide all DOCUMENTS stating that Cella, Lange, and Cella or Cella, Lange, and Cella LLP listed Mr. Marcus as an attorney employed by them from February 7, 2016 through February 7, 2017.
12. Please provide all DOCUMENTS demonstrating that Mr. Marcus was covered under malpractice insurance for Cella, Lange, and Cella or Cella, Lange, and Cella LLP from February 7, 2016 through February 7, 2017.

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. ☒ by delivering a true, legible, and durable **copy** of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - b. ☐ by delivering a true, legible, and durable **copy** of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - c. ☐ by making the **original** business records described in item 3 available for inspection at your business address by the attorney's representative and permitting **copying** at your business address under reasonable conditions during normal business hours.
2. *The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.*
3. *The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified): See Attachment 3.*

☒ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: March , 2017

Patrik Griego

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for DOES 1 through 10

(TITLE)

(Proof of service on reverse)

Page 1 of 2

Form Adopted for Mandatory Use
Judicial Council of California
SUBP-010 (Rev. January 1, 2012)

**DEPOSITION SUBPOENA FOR PRODUCTION
OF BUSINESS RECORDS**

Code of Civil Procedure, §§ 2020.410–2020.440;
Government Code, § 68097.1
www.courts.ca.gov

Westlaw Doc & Form Builder

EXHIBIT 2

PLAINTIFF/PETITIONER: Does 1 through 10	CASE NUMBER: CV170183
DEFENDANT/RESPONDENT: County of Humboldt, et al.	

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (name):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.

Amount: \$ _____

(2) ☐ Copying fees were paid.

Amount: \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date):

3. Person serving:

a. ☐ Not a registered California process server.

b. ☐ California sheriff or marshal.

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server.

e. ☐ Exempt from registration under Business and Professions Code section 22350(b).

f. ☐ Registered professional photocopier.

g. ☐ Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:



(SIGNATURE)



(SIGNATURE)

Attachment 3 to Deposition Subpoena for Production of Business Records

DOES 1 through 10 v. County of Humboldt, et al.

Humboldt County Superior Court Case No. CV170183

Definitions:

DOCUMENT or DOCUMENTS mean a "Writing" as broadly defined in California Evidence Code §250, as follows: "handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, texting, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored."

Please provide the following documents regarding employment of David Marcus by Cella, Lange, and Cella or Cella, Lange, and Cella, LLP. For each request the responding party can redact for names and addresses for clients and we are not seeking work-product:

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- 2. Please provide all DOCUMENTS reflecting any court appearances in California made by Mr. Marcus from February 7, 2016 through February 7, 2017.**
- 3. Please provide all DOCUMENTS reflecting the number of hours Mr. Marcus worked for Cella, Lange, and Cella or Cella, Lange, and Cella LLP from February 7, 2016 through February 7, 2017.**
- 4. Please provide all DOCUMENTS reflecting correspondence between Mr. Marcus and Cella, Lange, and Cella or Cella, Lange, and Cella, LLP regarding his employment between February 7, 2016 through February 7, 2017.**
- 5. Please provide all DOCUMENTS reflecting correspondence with the County of Humboldt or its representatives and investigators regarding Mr. Marcus' employment at Cella, Lange, and Cella or Cella, Lange, and Cella, LLP.**
- 6. Please provide all DOCUMENTS reflecting the number of hours Mr. Marcus performed legal work for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP and when that work took place during the time period between February 7, 2016 through February 7, 2017.**
- 7. Please provide all DOCUMENTS reflecting the type of legal work Mr. Marcus performed for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP between February 7, 2016 through February 7, 2017.**

8. Please provide all DOCUMENTS reflecting the venue of cases for which Mr. Marcus performed legal work for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP between February 7, 2016 through February 7, 2017.
9. Please provide all DOCUMENTS reflecting the geographical location of clients for whom Mr. Marcus performed legal work for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP from February 7, 2016 through February 7, 2017. For purposes of this request, as with all requests, any client names and street addresses can be redacted but information regarding the State should remain.
10. Please provide all DOCUMENTS reflecting contact between Mr. Marcus and clients of Cella, Lange, and Cella or Cella, Lange, and Cella LLP from February 7, 2016 through February 7, 2017.
11. Please provide all DOCUMENTS stating that Cella, Lange, and Cella or Cella, Lange, and Cella LLP listed Mr. Marcus as an attorney employed by them from February 7, 2016 through February 7, 2017.
12. Please provide all DOCUMENTS demonstrating that Mr. Marcus was covered under malpractice insurance for Cella, Lange, and Cella or Cella, Lange, and Cella LLP from February 7, 2016 through February 7, 2017.

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Patrik Griego SBN: 194216 JANSSEN MALLOY LLP 730 Fifth Street, PO Box 1288 Eureka, CA 95502 TELEPHONE NO.: 707-445-2071 FAX NO. (Optional): 707-445-8305 E-MAIL ADDRESS (Optional): pgriego@janssenlaw.com ATTORNEY FOR (Name): DOES 1 through 10		FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF HUMBOLDT STREET ADDRESS: 825 Fifth Street MAILING ADDRESS: 825 Fifth Street CITY AND ZIP CODE: Eureka, 95501 BRANCH NAME: Humboldt County Courthouse		
PLAINTIFF/ PETITIONER: Does 1 through 10 DEFENDANT/ RESPONDENT: County of Humboldt, et al.		CASE NUMBER: CV170183
NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION (Code Civ. Proc., §§ 1985.3, 1985.6)		

NOTICE TO CONSUMER OR EMPLOYEE

TO (name): David Marcus

- PLEASE TAKE NOTICE THAT REQUESTING PARTY (name): DOES 1 through 10
 SEEKS YOUR RECORDS FOR EXAMINATION by the parties to this action on (specify date): April 4, 2017
 The records are described in the subpoena directed to witness (specify name and address of person or entity from whom records are sought): Cella Lange & Cella 1600 S. Main Street, Suite 180
 Walnut Creek, CA 94596
 A copy of the subpoena is attached.
- IF YOU OBJECT to the production of these records, YOU MUST DO ONE OF THE FOLLOWING BEFORE THE DATE SPECIFIED.
 IN ITEM a. OR b. BELOW:
 - If you are a party to the above-entitled action, you must file a motion pursuant to Code of Civil Procedure section 1987.1 to quash or modify the subpoena and give notice of that motion to the witness and the deposition officer named in the subpoena at least five days before the date set for production of the records.
 - If you are not a party to this action, you must serve on the requesting party and on the witness, before the date set for production of the records, a written objection that states the specific grounds on which production of such records should be prohibited. You may use the form below to object and state the grounds for your objection. You must complete the Proof of Service on the reverse side indicating whether you personally served or mailed the objection. The objection should not be filed with the court. **WARNING: IF YOUR OBJECTION IS NOT RECEIVED BEFORE THE DATE SPECIFIED IN ITEM 1, YOUR RECORDS MAY BE PRODUCED AND MAY BE AVAILABLE TO ALL PARTIES.**
- YOU OR YOUR ATTORNEY MAY CONTACT THE UNDERSIGNED to determine whether an agreement can be reached in writing to cancel or limit the scope of the subpoena. If no such agreement is reached, and if you are not otherwise represented by an attorney in this action, YOU SHOULD CONSULT AN ATTORNEY TO ADVISE YOU OF YOUR RIGHTS OF PRIVACY.

Date: March 15, 2017

Patrik Griego

(TYPE OR PRINT NAME)

 (SIGNATURE OF ☐ REQUESTING PARTY ☒ ATTORNEY)

OBJECTION BY NON-PARTY TO PRODUCTION OF RECORDS

- ☐ I object to the production of all of my records specified in the subpoena.
- ☐ I object only to the production of the following specified records:

3. The specific grounds for my objection are as follows:

Date:

(TYPE OR PRINT NAME)

(SIGNATURE)

(Proof of service on reverse)

PLAINTIFF/PETITIONER: Does I through 10	CASE NUMBER:
DEFENDANT/RESPONDENT: County of Humboldt, et al.	CV170183

PROOF OF SERVICE OF NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION
(Code Civ. Proc., §§ 1985.3, 1985.6)

☒ Personal Service ☐ Mail

- At the time of service I was at least 18 years of age and not a party to this legal action.
 - I served a copy of the *Notice to Consumer or Employee and Objection* as follows (check either a or b):
 - ☒ **Personal service.** I personally delivered the *Notice to Consumer or Employee and Objection* as follows:
 - Name of person served: David Marcus
 - Address where served: 1001 4th St. Eureka, CA 95501
 - Date served: 3/15/17
 - Time served: 11:38 am
 - ☐ **Mail.** I deposited the *Notice to Consumer or Employee and Objection* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - Name of person served:
 - Address:
 - Date of mailing:
 - Place of mailing (city and state):
- (5) I am a resident of or employed in the county where the *Notice to Consumer or Employee and Objection* was mailed.
- My residence or business address is (specify): Janssen Malloy LLP, 730 Fifth Street, Eureka, CA 95501
 - My phone number is (specify): 707-445-2071

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

Date: March 15, 2017

Marie Escareno
(TYPE OR PRINT NAME OF PERSON WHO SERVED)

Marie Escareno
(SIGNATURE OF PERSON WHO SERVED)

PROOF OF SERVICE OF OBJECTION TO PRODUCTION OF RECORDS
(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☐ Mail

- At the time of service I was at least 18 years of age and not a party to this legal action.
 - I served a copy of the *Objection to Production of Records* as follows (complete either a or b):
 - ON THE REQUESTING PARTY**
 - ☐ **Personal service.** I personally delivered the *Objection to Production of Records* as follows:
 - Name of person served:
 - Address where served:
 - Date served:
 - Time served:
 - ☐ **Mail.** I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - Name of person served:
 - Address:
 - Date of mailing:
 - Place of mailing (city and state):
 - ON THE WITNESS**
 - ☐ **Personal service.** I personally delivered the *Objection to Production of Records* as follows:
 - Name of person served:
 - Address where served:
 - Date served:
 - Time served:
 - ☐ **Mail.** I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - Name of person served:
 - Address:
 - Date of mailing:
 - Place of mailing (city and state):
- (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
- My residence or business address is (specify):
 - My phone number is (specify):
- I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- Date:

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Patrik Griego SBN: 194216 JANSSEN MALLOY LLP 730 Fifth Street, P.O. Box 1288, Eureka, CA 95502 TELEPHONE NO.: 707-445-2071 FAX NO.: 707-445-8305 E-MAIL ADDRESS: pgriego@janssenlaw.com ATTORNEY FOR (Name): DOES 1 through 10	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF HUMBOLDT STREET ADDRESS: 825 Fifth Street MAILING ADDRESS: 825 Fifth Street CITY AND ZIP CODE: Eureka, 95501 BRANCH NAME: Humboldt County Courthouse	
PLAINTIFF/PETITIONER: Does 1 through 10 DEFENDANT/RESPONDENT: County of Humboldt, et al.	
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS	CASE NUMBER: CV170183

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Cella Lange & Cella telephone number: (925) 974-1110
 1600 S. Main Street, Suite 180, Walnut Creek, CA 94596

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer): Patrik Griego, Esq.

On (date): April 4, 2017

At (time): 10:00 a.m.

Location (address): Janssen Malloy LLP, 730 Fifth Street, Eureka, CA 95501

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. ☒ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b. ☐ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c. ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified): See Attachment 3.

☒ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: March 15, 2017

Patrik Griego

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for DOES 1 through 10

(TITLE)

(Proof of service on reverse)

Page 1 of 2

PLAINTIFF/PETITIONER: Does 1 through 10	CASE NUMBER: CV170183
DEFENDANT/RESPONDENT: County of Humboldt, et al.	

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.

Amount: \$ _____

(2) ☐ Copying fees were paid.

Amount: \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

a. ☐ Not a registered California process server.

b. ☐ California sheriff or marshal.

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server.

e. ☐ Exempt from registration under Business and Professions Code section 22350(b).

f. ☐ Registered professional photocopier.

g. ☐ Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

(SIGNATURE)

(SIGNATURE)

Attachment 3 to Deposition Subpoena for Production of Business Records

DOES 1 through 10 v. County of Humboldt, et al.
Humboldt County Superior Court Case No. CV170183

Definitions:

DOCUMENT or DOCUMENTS mean a "Writing" as broadly defined in California Evidence Code §250, as follows: "handwriting, typewriting, printing, photostating, photographing, photocopying, transmitting by electronic mail or facsimile, texting, and every other means of recording upon any tangible thing, any form of communication or representation, including letters, words, pictures, sounds, or symbols, or combinations thereof, and any record thereby created, regardless of the manner in which the record has been stored."

Please provide the following documents regarding employment of David Marcus by Cella, Lange, and Cella or Cella, Lange, and Cella, LLP. For each request the responding party can redact for names and addresses for clients and we are not seeking work-product:

1. Please provide all DOCUMENTS regarding payments made by Cella, Lange, and Cella or Cella, Lange, and Cella, LLP to Mr. Marcus from February 7, 2016 through February 7, 2017 for legal work performed by Mr. Marcus. This should include, but not be limited to, W-2 Forms.
2. Please provide all DOCUMENTS reflecting any court appearances in California made by Mr. Marcus from February 7, 2016 through February 7, 2017.
3. Please provide all DOCUMENTS reflecting the number of hours Mr. Marcus worked for Cella, Lange, and Cella or Cella, Lange, and Cella LLP from February 7, 2016 through February 7, 2017.
4. Please provide all DOCUMENTS reflecting correspondence between Mr. Marcus and Cella, Lange, and Cella or Cella, Lange, and Cella, LLP regarding his employment between February 7, 2016 through February 7, 2017.
5. Please provide all DOCUMENTS reflecting correspondence with the County of Humboldt or its representatives and investigators regarding Mr. Marcus' employment at Cella, Lange, and Cella or Cella, Lange, and Cella, LLP.
6. Please provide all DOCUMENTS reflecting the number of hours Mr. Marcus performed legal work for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP and when that work took place during the time period between February 7, 2016 through February 7, 2017.
7. Please provide all DOCUMENTS reflecting the type of legal work Mr. Marcus performed for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP between February 7, 2016 through February 7, 2017.

8. Please provide all DOCUMENTS reflecting the venue of cases for which Mr. Marcus performed legal work for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP between February 7, 2016 through February 7, 2017.
9. Please provide all DOCUMENTS reflecting the geographical location of clients for whom Mr. Marcus performed legal work for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP from February 7, 2016 through February 7, 2017. For purposes of this request, as with all requests, any client names and street addresses can be redacted but information regarding the State should remain.
10. Please provide all DOCUMENTS reflecting contact between Mr. Marcus and clients of Cella, Lange, and Cella or Cella, Lange, and Cella LLP from February 7, 2016 through February 7, 2017.
11. Please provide all DOCUMENTS stating that Cella, Lange, and Cella or Cella, Lange, and Cella LLP listed Mr. Marcus as an attorney employed by them from February 7, 2016 through February 7, 2017.
12. Please provide all DOCUMENTS demonstrating that Mr. Marcus was covered under malpractice insurance for Cella, Lange, and Cella or Cella, Lange, and Cella LLP from February 7, 2016 through February 7, 2017.

1 **PROOF OF SERVICE**

2 I am a citizen of the United States and a resident of the County of Humboldt,
3 over the age of eighteen years and not a party to or interested in the within entitled cause.
4 My business address is 730 Fifth Street. Eureka, California, 95501.

5 On March 15, 2017, I served the following documents:

6 **DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS**
7 **RECORDS TO CELLA LANGE & CELLA**

8 [X] **[BY HAND-DELIVERY]**

9 By placing a true copy thereof enclosed in a sealed envelope, addressed as shown
10 below and causing delivery of same to the individual named below or to that
11 individual in care of a member of his/her office, prior to 5:00 p.m.

12
13 Humboldt County Counsel
14 825 5th St, #112
15 Eureka, CA 95501
16 Attorneys for County of Humboldt

17 I declare under penalty of perjury that the foregoing is true and correct, and that
18 this declaration was executed on March 15, 2017 at Eureka, California.

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LESA MYERS

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Patrik Griego SBN: 194216 JANSSEN MALLOY LLP 730 Fifth Street, P.O. Box 1288, Eureka, CA 95502 TELEPHONE NO.: 707-445-2071 FAX NO. 707-445-8305 E-MAIL ADDRESS: pgriego@janssenlaw.com ATTORNEY FOR (Name): DOES 1 through 10	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF HUMBOLDT STREET ADDRESS: 825 Fifth Street MAILING ADDRESS: 825 Fifth Street CITY AND ZIP CODE: Eureka, 95501 BRANCH NAME: Humboldt County Courthouse	
PLAINTIFF/PETITIONER: Does 1 through 10 DEFENDANT/RESPONDENT: County of Humboldt, et al.	
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS	CASE NUMBER: CV170183

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 David Marcus telephone number: (707) 445-7634
 1001 4th Street, Eureka, CA 95501

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer): Patrik Griego, Esq.

On (date): April 4, 2017

At (time): 10:00 a.m.

Location (address): Janssen Malloy LLP, 730 Fifth Street, Eureka, CA 95501

Do not release the requested records to the deposition officer prior to the date and time stated above.

- a. ☒ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
- b. ☐ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
- c. ☐ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified): See Attachment 3.

☐ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: March 15, 2017

Patrik Griego

(TYPE OR PRINT NAME)

(SIGNATURE OF PERSON ISSUING SUBPOENA)

Attorney for DOES 1 through 10

(Proof of service on reverse)

(TITLE)

Page 1 of 2

PLAINTIFF/PETITIONER: Docs 1 through 10	CASE NUMBER CV170183
DEFENDANT/RESPONDENT: County of Humboldt, et al.	

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (name): David Marcus

b. Address where served: 1001 4th St, Eureka CA 95501

c. Date of delivery: 3/15/17

d. Time of delivery: 11:38 am

e. (1) ☐ Witness fees were paid.

Amount: \$ _____

(2) ☐ Copying fees were paid.

Amount: \$ _____

f. Fee for service: \$ _____

2. I received this subpoena for service on (date): 3/15/17

3. Person serving:

a. ☒ Not a registered California process server.

b. ☐ California sheriff or marshal.

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server.

e. ☐ Exempt from registration under Business and Professions Code section 22350(b).

f. ☐ Registered professional photocopier.

g. ☐ Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

Marie Escareño

730 5th St

Eureka, CA 95501

(707) 445-2071

Janssen Malloy LLP

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

Date: 3/15/17

► Marie Escareño

(SIGNATURE)

(For California sheriff or marshal use only)

I certify that the foregoing is true and correct.

Date: _____

► _____

(SIGNATURE)

Attachment 3 to Deposition Subpoena for Production of Business Records

DOES 1 through 10 v. County of Humboldt, et al.
Humboldt County Superior Court Case No. CV170183

Definitions:

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Please provide the following documents regarding employment of David Marcus by Cella, Lange, and Cella or Cella, Lange, and Cella, LLP. For each request the responding party can redact for names and addresses for clients and we are not seeking work-product:

1. Please provide all DOCUMENTS regarding payments made by Cella, Lange, and Cella or Cella, Lange, and Cella, LLP to Mr. Marcus from February 7, 2016 through February 7, 2017 for legal work performed by Mr. Marcus. This should include, but not be limited to, W-2 Forms or 1099 Forms.
2. Please provide all DOCUMENTS regarding payments made to Mr. Marcus for legal work performed from February 7, 2016 through February 7, 2017.
3. Please provide all DOCUMENTS reflecting any court appearances in California made by Mr. Marcus from February 7, 2016 through February 7, 2017.
4. Please provide all DOCUMENTS reflecting that Mr. Marcus was retained by a client to perform legal work in California from February 7, 2016 through February 7, 2017.
5. Please provide all DOCUMENTS reflecting the number of hours Mr. Marcus worked for Cella, Lange, and Cella or Cella, Lange, and Cella LLP from February 7, 2016 through February 7, 2017.
6. Please provide all DOCUMENTS reflecting the number of hours Mr. Marcus performed legal work for clients in California from February 7, 2016 through February 7, 2017.
7. Please provide all DOCUMENTS reflecting correspondence between Mr. Marcus and Cella, Lange, and Cella or Cella, Lange, and Cella, LLP regarding his employment between February 7, 2016 through February 7, 2017.
8. Please provide all DOCUMENTS reflecting correspondence with the County of Humboldt or its representatives and investigators regarding Mr. Marcus' employment at Cella, Lange, and Cella or Cella, Lange, and Cella, LLP.

9. Please provide all DOCUMENTS reflecting the number of hours Mr. Marcus performed legal work for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP and when that work took place during the time period between February 7, 2016 through February 7, 2017.
10. Please provide all DOCUMENTS reflecting the type of legal work Mr. Marcus performed for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP between February 7, 2016 through February 7, 2017.
11. Please provide all DOCUMENTS reflecting the type of legal work Mr. Marcus performed for California clients February 7, 2016 through February 7, 2017.
12. Please provide all DOCUMENTS reflecting the venue of cases for which Mr. Marcus performed legal work for Cella, Lange, and Cella or Cella, Lange, and Cella, LLP between February 7, 2016 through February 7, 2017.
13. Please provide all DOCUMENTS reflecting the venue of any cases for which Mr. Marcus performed legal work for clients February 7, 2016 through February 7, 2017.
14. Please provide all pleadings upon which Mr. Marcus appears from February 7, 2016 through February 7, 2017.
15. Please provide all DOCUMENTS reflecting the geographical location of clients for whom Mr. Marcus performed legal work from February 7, 2016 through February 7, 2017. For purposes of this request, as with all requests, any client names and street addresses can be redacted but information regarding the State should remain.
16. Please provide all DOCUMENTS reflecting contact between Mr. Marcus and clients of Cella, Lange, and Cella or Cella, Lange, and Cella LLP from from February 7, 2016 through February 7, 2017.
17. Please provide all DOCUMENTS stating that Cella, Lange, and Cella or Cella, Lange, and Cella LLP listed Mr. Marcus as an attorney employed by them from February 7, 2016 through February 7, 2017.
18. Please provide all DOCUMENTS demonstrating that Mr. Marcus was covered under malpractice insurance for Cella, Lange, and Cella or Cella, Lange, and Cella LLP from February 7, 2016 through February 7, 2017.
19. Please provide all DOCUMENTS demonstrating that Mr. Marcus maintained professional liability insurance from February 7, 2016 through February 7, 2017.
20. Please provide all DOCUMENTS demonstrating that Mr. Marcus participated in MCLE classes for the past five years, including the types of MCLE classes and subject matter.
21. Please provide a list of all licenses held by Mr. Marcus for the past five years.
22. Please provide a list of all employment held by Mr. Marcus for the past five years.


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On March 15, 2017, I served the following documents:

[X] [BY HAND-DELIVERY]

Humboldt County Counsel
825 5th St. #112
Eureka, CA 95501
Attorneys for County of Humboldt

that the foregoing is true and correct.
 15, 2017 at Eureka, California.



 LESA MYERS