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Attorneys for Defendants,
BRAD MARTINEZ, VICKI MARTINEZ, and
GAIL D. CALHOUN, AS TRUSTEE OF THE GAIL D. CALHOUN FAMILY TRUST

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES – ALHAMBRA COURTHOUSE**

JAMES BURBANK, an individual;
JENNIFER BURBANK, an individual;

Plaintiffs,

vs.

BRAD MARTINEZ, an individual; VICKI
MARTINEZ, an individual; GAIL D.
CALHOUN, as TRUSTEE of the GAIL D.
CALHOUN FAMILY TRUST; LOTUS
PROPERTY MANAGEMENT, INC.; BRIAN
GORDON, an individual; SALLY
GUTIERREZ, an individual; GRACE
CHENG, an individual; DOES 1 – 50,
inclusive;

Defendants.

CASE NO: 24NNCV06082

*Assigned for All Purposes to:
Hon. Sarah J. Heidel .– Dept. V*

**NOTICE OF TAKING MOTIONS TO
COMPEL OFF CALENDAR**

Date: August 25, 2025
Time: 8:30 a.m.
Dept.: V

*Trial Date: None Set
Complaint Filed: November 25, 2024*

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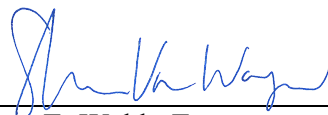
TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that Defendant BRAD MARTINEZ hereby takes his Motions to Compel responses from Plaintiffs JAMES BURBANK and JENNIFER BURBANK. as to Request for Production of Documents, Set One, set for August 25, 2025 at 8:30 a.m. in Department V of the above-entitled Court, OFF calendar.

DATED: August 11, 2025

**MANNING & KASS
ELLROD, RAMIREZ, TRESTER LLP**

By: _____



Lane E. Webb, Esq.
Shanna Van Wagner, Esq.
Attorneys for Defendants,
BRAD MARTINEZ, VICKI MARTINEZ, and
GAIL D. CALHOUN, AS TRUSTEE OF THE
GAIL D. CALHOUN FAMILY TRUST

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My business address is 225 Broadway, Suite 2000, San Diego, CA 92101.

On **August 11, 2025**, I served the foregoing document(s) described as **NOTICE OF TAKING MOTIONS TO COMPEL OFF CALENDAR** on the interested parties by electronic service addressed as follows:

Joseph Kellener
David R. Greene
Dignity Law Group, APC
14401 Sylvan St, Ste 102
Van Nuys, CA 91401
Tel: (323) 212 5365
Email: info@dignitylawgroup.com

Counsel for Plaintiffs James Burbank and Jennifer Burbank

- ☐ **BY MAIL:** As follows: I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, I deposited such envelope in the mail at San Diego, California.
- ☒ **BY E-MAIL:** I caused all of the pages of the above-entitled document to be sent to the recipient(s) noted via email at the respective email address(es) indicated above.
- ☐ **BY FEDERAL EXPRESS/OVERNIGHT MAIL:** I caused the above-described document to be served on the interested parties noted as follows by Federal Express/Overnight Mail.
- ☐ **BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the office(s) of the addressee via messenger.
- ☐ **BY ELECTRONIC TRANSFER** via electronic filing service provider and pursuant to *California Rules of Court*, Rule 2.251, sent by e-Service through e-Filing Portal at the time the documents were electronically filed. The service was made on the email addresses listed with the court.

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

Executed on **August 11, 2025**, at San Diego, California.


Deanna Canepa