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Attorney for Defendants,
RICHARD BEE AND CAROL BEE

**ELECTRONICALLY
FILED**

**Superior Court of California,
County of San Francisco**

04/20/2016
Clock of the Court

BY ALISON AGBAY

ROBERT
Deputy Clerk

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN FRANCISCO**

KEITH MARTIN

Plaintiff.

VS

RICHARD BEE and CAROL BEE

Defendants

Case No.: CGC-15-543473
UNLIMITED JURISDICTION

**NOTICE OF LODGMENT OF EXHIBITS IN
SUPPORT OF MOTION FOR SUMMARY
JUDGMENT BY DEFENDANTS RICHARD
BEE AND CAROL BEE and EXHIBITS A-D**

[filed concurrently with notice, memorandum of points and authorities, declaration of David W. Chen and separate statement of material facts and supporting evidence.]

DATE: July 6, 2016

TIME: 9:30 A.M.

DEPT.: 302

Reservation # 04150706-10

Defendants Richard Bee and Carol Bee hereby lodge with the Court the following exhibits in support of their Motion for Summary Judgment:

Exhibit A: Complaint in this matter.

Exhibit B: Requests for Admission, Set No. 1, served on plaintiff on December 1, 2015.

Exhibit C: Order of the Court dated February 4, 2016, whereby Requests for Admissions

were deemed admitted

Exhibit D: Notice of Ruling

1 DATED: April 20, 2016

STRATMAN, PATTERSON & HUNTER

2 BY: 

3 DAVID W. CHEN, ESQ.
4 Attorney for Defendants,
5 RICHARD BEE AND CAROL BEE

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EXHIBIT “A”

1022860324-15

<p>ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, Address and telephone number, if known)</p> <p>William Green SBN 123814 Delfino Green & Green, 1010 B Street, #120, San Rafael, CA 94901. Telephone: 415-472-4646</p> <p>Angela Davidson SBN 282584 Sharon DeKing-Treen SBN 131708</p> <p>Attorney's address (same as above)</p> <p>Attorney for Plaintiff Plaintiff</p>		<p>PLD-PF-081 NO COPIES MADE DRAFT FEB 02 2015 CLERK OF THE COURT RECEIVED BY DELIVERED MAILED FEB 02 2015</p>
<p>JURISDICTION, COUNTY OR CALIFORNIA, COUNTY OR SAN FRANCISCO ATTY ADDRESS: 400 McAllister Street MAILING ADDRESS: CITY AND STATE: San Francisco, 94102 JURISDICTION: Civil PLAINTIFF: Keith Martin</p>		
<p>DEFENDANT: Richard Bee and Carol Bee</p>		
<p><input checked="" type="checkbox"/> Does 1 to 50</p> <p>COMPLAINT: Personal Injury, Property Damage, Wrongful Death</p> <p><input type="checkbox"/> AMENDED (Number):</p> <p>Type (check all that apply):</p> <p><input checked="" type="checkbox"/> MOTOR VEHICLE <input type="checkbox"/> OTHER (Specify): <input type="checkbox"/> Property Damage <input type="checkbox"/> Wrongful Death <input type="checkbox"/> Personal Injury <input type="checkbox"/> Other Damages (Specify):</p>		
<p>JURISDICTION (check all that apply):</p> <p><input type="checkbox"/> ACTION IS A LIMITED CIVIL CASE <input type="checkbox"/> Amount demanded: <input type="checkbox"/> does not exceed \$10,000 <input type="checkbox"/> exceeds \$10,000, but does not exceed \$25,000</p> <p><input checked="" type="checkbox"/> ACTION IS AN UNLIMITED CIVIL CASE (exceeds \$25,000)</p> <p><input type="checkbox"/> ACTION IS DECLINED BY this unopposed complaint <input type="checkbox"/> from Plaintiff to Unopposed <input type="checkbox"/> from Unopposed to Plaintiff</p>		<p>Date issued: 02-14-2015 Cal-14-543473</p>

1. Plaintiff (name or name): Keith Martin

Attages cause of action against defendant (name or names):

Richard and Carol Bee

2. Title pleading, including citations and exhibits, consists of the following number of pages:

3. Each plaintiff named above is a competent adult:

- a. except plaintiff (name):
- (1) a corporation qualified to do business in California
 - (2) an unincorporated entity (specify):
 - (3) a public entity (specify):
 - (4) a minor an adult
 - (a) for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) other (Specify):
 - (5) other (Specify):
- b. except plaintiff (name):
- (1) a corporation qualified to do business in California
 - (2) an unincorporated entity (specify):
 - (3) a public entity (specify):
 - (4) a minor an adult
 - (a) for whom a guardian or conservator of the estate or a guardian ad litem has been appointed
 - (b) other (Specify):
 - (5) other (Specify):

 Information about additional plaintiffs who are not competent adults is shown in Attachment 3.Form Approved for Use in the
Superior Courts of California
P-300-Civil-Cover-Form-1, 1997COMPLAINT—Personal Injury, Property
Damage, Wrongful DeathDate of filing, page 1
Date of filing, page 2
Date of filing, page 3

1022840321-1-5

PLD-C-001

SHORT TITLE:	CASE NUMBER:
Martin v. Boco	

4. Plaintiff (name):
is doing business under the fictitious name (specify):
and has complied with the fictitious business name laws.
5. Each defendant named above is a natural person
- a. except defendant (name):
(1) a business organization, form unknown
(2) a corporation
(3) an unincorporated entity (describe):
(4) a public entity (describe):
(5) other (specify):
- c. except defendant (name):
(1) a business organization, form unknown
(2) a corporation
(3) an unincorporated entity (describe):
(4) a public entity (describe):
(5) other (specify):
- b. except defendant (name):
(1) a business organization, form unknown
(2) a corporation
(3) an unincorporated entity (describe):
(4) a public entity (describe):
(5) other (specify):
- d. except defendant (name):
(1) a business organization, form unknown
(2) a corporation
(3) an unincorporated entity (describe):
(4) a public entity (describe):
(5) other (specify):
- Information about additional defendants who are not natural persons is contained in Attachment B.
6. The true names of defendants such as Does are unknown to plaintiff.
- a. Doe defendants (specify Doe numbers): 1-24 were the agents or employees of other named defendants and acted within the scope of that agency or employment.
- b. Doe defendants (specify Doe numbers): 26-50 are persons whose capacities are unknown to plaintiff.
7. Defendants who are joined under Code of Civil Procedure section 382 are (names):
8. This court is the proper court because
- a. at least one defendant now resides in its jurisdictional area.
b. the principal place of business of a defendant corporation or unincorporated association is in its jurisdictional area.
c. Injury to person or damage to personal property occurred in its jurisdictional area.
d. other (specify):
9. Plaintiff is required to comply with a claims statute, and
a. has complied with applicable claims statutes, or
b. is excused from complying because (specify):

1022684321-15

SHORT TITLE: Marin v. Bee	CASE NUMBER: PLD-PI-003
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10. The following causes of action are attached and the statements above apply to each (each complaint must have one or more causes of action attached):
- Motor Vehicle
 - General Negligence
 - Intentional Tort
 - Products Liability
 - Premises Liability
 - Other (specify):

11. Plaintiff has suffered
- wage loss
 - loss of use of property
 - hospital and medical expenses
 - general damage
 - property damage
 - loss of earning capacity
 - other damage (specify):

12. The damages claimed for wrongful death and the relationship of plaintiff to the deceased are
- listed in Attachment 12.
 - as follows:

13. The relief sought in this complaint is within the jurisdiction of this court.

14. Plaintiff prays for judgment for costs of suit; for such relief as is fair, just, and equitable; and for
- a. (1) compensatory damages
 - (2) punitive damages

The amount of damages is (in cases for personal injury or wrongful death, you must check (1)):

- (1) according to proof
- (2) in the amount of: \$

15. The paragraphs of this complaint alleged on information and belief are as follows (specify paragraph numbers):

Date: January 2, 2015

Sharon Delfino Green, Esq.

(TYPE OR PRINT NAME)

SHARON D. DELFINO, ATTORNEY

Notarized on January 1, 2015

COMPLAINT—Personal Injury, Property
Damage, Wrongful Death

Page 3 of 9

1027-806724-1-FS

PLD-PI-001(1)

SHORT TITLE:	CASE NUMBER:
Martin v. Bee	

1 CAUSE OF ACTION—Motor Vehicle

(number)

ATTACHMENT TO Complaint Cross-Complaint

(Use a separate cause of action form for each cause of action.)

Plaintiff (name): Keith Martin

MV-1. Plaintiff alleges the acts of defendants were negligent; the acts were the legal (proximate) cause of injuries and damages to plaintiff; the acts occurred

on (date): January 3, 2013

at (place):

5th Street in San Francisco, California

2. DEFENDANTS

a. The defendants who operated a motor vehicle are (names):
Carol Bee Does 1 to 25b. The defendants who employed the persons who operated a motor vehicle in the course of their employment are (names): Does _____ to _____c. The defendants who owned the motor vehicle which was operated with their permission are (names):
Richard Bee Does 26 to 50d. The defendants who entrusted the motor vehicle are (names):
Richard Bee Does 26 to 50e. The defendants who were the agents and employees of the other defendants and acted within the scope of the agency were (names): Does _____ to _____f. The defendants who are liable to plaintiff for other reasons and the reasons for the liability are
 listed in Attachment MV-2f as follows: Does _____ to _____Page 4

Form Approved for General Use
Justice Council of California
PLD-PI-001(1) (Rev. January 3, 2002)

CAUSE OF ACTION—Motor Vehicle

Page 1 of 1
Case # 1027-806724-1-FS
Filing Date 02/09/2015 00:20
Filing Court San Francisco Superior Court

1027860321-15

PLD-PI-001(2)

2. CAUSE OF ACTION--General Negligence Page 5

ATTACHMENT TO Complaint Cross-Complaint

(Use a separate cause of action form for each cause of action.)

ON-1. Plaintiff (name): Keith Martin

alleges that defendant (name): Carol Gee

Does work

was the legal (proximate) cause of damages to plaintiff. By the following acts or omissions to act, defendant negligently caused the damage to plaintiff:

on (date): January 3, 2013

at (place): 5th Street in San Francisco, CA

(List/presentation of reasons for instability)

Plaintiff was stopped at a red light on 5th Street, just west of Polson Street in San Francisco. Plaintiff was hit from behind by Defendant Carol Bee with force causing Plaintiff's head to snap back against seat causing injury to his neck.

Defendants negligence proximately caused damage to Mr. Martin of a nature and in amount according to proof at trial.

Part Approved for Children's Use
Judicial Council of California
PC 1274.5 (Rev. January 1, 2007)

CAUSE OF ACTION—General Negligence

Digitized by srujanika@gmail.com

10278100 321-15

CASE NUMBER: 05CVS-34378 KEITH MARTIN VS RICHARD J. ET AL

NOTICE TO PLAINTIFF

Case Management Conference is set for:

DATE: JUN 03 2015

TIME: 10:30AM

PLACE: Department 070
400 McAllister Street
San Francisco, CA 94102-3580

All parties shall appear and participate. Legal notice:

CCR 35-105 required the filing and service of a case management statement form CM-105 no later than 15 days before the date management conference. However, it would be in the interest of a case management order, without an appearance, at the case management conference, if the case management statement is filed, dated and served 10 days before and in twenty-five (25) days before the case management conference.

Plaintiff is advised to copy of the notice upon each party to this action with the summons and complaint. Filing of service subsequently filed with this court shall suffice. This case is eligible for electronic filing and service per Local Rule 7-10. For more information please visit the Courts website at www.supcourt.ca.gov under Online Services.

ALTERNATIVE DISPUTE RESOLUTION POLICY REQUIREMENTS

IT IS THE POLICY OF THE SUPERIOR COURT THAT EVERY CIVIL CASE PARTICIPATE IN EITHER MEDIATION, ARBITRATION, OR AN ALTERNATIVE DISPUTES RESOLUTION PROGRAM OR SOME OTHER FORM OF ALTERNATIVE DISPUTE RESOLUTION PRIOR TO A TRIAL.

See Local Rule 7-10.

Plaintiff is advised to copy of the Alternative Dispute Resolution Information Package on each defendant along with the complaint. All court mediators are to file a signed and dated affidavit and provide clients with a copy of the Alternative Dispute Resolution Information Package prior to filing the Case Management Statement.

DEFENDANT'S ATTENDING THE CASE MANAGEMENT CONFERENCE DOES NOT MEAN THE FAILURE OF FILING A WRITTEN RESPONSE TO THE COMPLAINT. IT MUST BE FILED WITHIN THE TIME LIMIT REQUIRED BY LAW. SEE ALMUNI 11.

Superior Court Alternative Dispute Resolution Coordinator

400 McAllister Street, Room 113

SAC-FRANCISCO, CA 94102

415-557-1455

See Local Rules 3.3, 3.4, and 3.7 for application to Judge presiding.

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Superior Court of California, County of San Francisco
 Alternative Dispute Resolution
 Program Information Package



The plaintiff must serve a copy of the ADR Information package
 on each defendant along with the complaint. (CRC 3.221(c))

WHAT IS ADR?

Alternative Dispute Resolution (ADR) is the term used to describe the various options available for settling a dispute without a trial. There are many different ADR processes, the most common forms of which are mediation, arbitration and settlement conferences. In ADR, trained, impartial people decide disputes or help parties decide disputes themselves. They can help parties resolve disputes without having to go to court.

WHY CHOOSE ADR?

"It is the policy of the Superior Court that every noncriminal, nonjuvenile case participate either in an early settlement conference, mediation, arbitration, early neutral evaluation or some other alternative dispute resolution process prior to trial." (Local Rule 4)

ADR can have a number of advantages over traditional litigation:

- ADR can save time. A dispute often can be resolved in a matter of months, even weeks, through ADR, while a lawsuit can take years.
- ADR can save money, including court costs, attorney fees, and expert fees.
- ADR encourages participation. The parties may have more opportunities to tell their story than in court and may have more control over the outcome of the case.
- ADR is more satisfying. For all the above reasons, many people participating in ADR have reported a high degree of satisfaction.

HOW DO I PARTICIPATE IN ADR?

Litigants may elect to participate in ADR at any point in a case. General civil cases may voluntarily enter into the court's ADR programs by any of the following means:

- Filing a Stipulation to ADR: Complete and file the Stipulation form (attached to this packet) at the clerk's office located at 400 McAllister Street, Room 103;
- Indicating your ADR preference on the Case Management Statement (also attached to this packet); or
- Contacting the court's ADR office (see below) or the Bar Association of San Francisco's ADR Services at 415-782-8905 or www.sfsuperior.org/adr for more information.

For more information about ADR programs or dispute resolution alternatives, contact:

Superior Court Alternative Dispute Resolution
 400 McAllister Street, Room 103, San Francisco, CA 94102
 415-551-3876

Or visit the court ADR website at www.sfsuperior.org/adr

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The San Francisco Superior Court offers different types of ADR processes for general civil matters; each ADR program is described in the subsections below.

1) SETTLEMENT CONFERENCES

The goal of settlement conferences is to provide participants an opportunity to reach a mutually acceptable settlement that resolves all or part of a dispute early in the litigation process.

(A) THE BAR ASSOCIATION OF SAN FRANCISCO (BASF) EARLY SETTLEMENT PROGRAM (ESP): ESP remains as one of the Court's ADR programs (see Local Rule 4.9) but parties must select the program – the Court no longer will order parties into ESP.

Operation: Panels of pre-screened attorneys (one plaintiff, one defense counsel) each with at least 10 years' trial experience provide a minimum of two hours of settlement conference time, including evaluation of strengths and weakness of a case and potential case value. On occasion, a panelist with extensive experience in both plaintiff and defense roles serves as a sole panelist. BASF handles notification to all parties, conflict checks with the panelists, and full case management. The success rate for the program is 78% and the satisfaction rate is 97%. Full procedures are at www.sfbaz.org/esp.

Cost: BASF charges an administrative fee of \$295 per party with a cap of \$690 for parties represented by the same counsel. Waivers are available to those who qualify. For more information, call Marilyn King at 415-752-8905, email adr@sfbaz.org or see the enclosed brochure.

(B) MANDATORY SETTLEMENT CONFERENCES: Parties may elect to apply to the Presiding Judge's department for a specially-set mandatory settlement conference. See Local Rule 6.0 for further instructions. Upon approval of the Presiding Judge, the court will schedule the conference and assign the case for a settlement conference.

2) MEDIATION

Mediation is a voluntary, flexible, and confidential process in which a neutral third party facilitates negotiations. The goal of mediation is to reach a mutually satisfactory agreement, before incurring the expense of going to court, that resolves all or part of a dispute after exploring the interests, needs, and priorities of the parties in light of relevant evidence and the law. A mediator strives to bring the parties to a mutually beneficial settlement of the dispute.

(A) MEDIATION SERVICES OF THE BAR ASSOCIATION OF SAN FRANCISCO: In cooperation with the Superior Court, is designed to help civil litigants resolve disputes before they incur substantial costs in litigation. While it is best to utilize the program at the outset of litigation, parties may use the program at any time while a case is pending.

Operation: Experienced professional mediators, screened and approved, provide one hour of preparation time and the first two hours of mediation time. Mediation time beyond that is charged at the mediator's hourly rate. BASF pre-screens all mediators based upon strict educational and experience requirements. Parties can select their mediator from the panels at www.sfbaz.org/mediation or BASF can assist with mediator selection. The BASF website contains photographs, biographies, and videos of the mediators as well as testimonials to assist with the selection process. BASF staff handles conflict checks and full case management.

ADR-2 10/28/04

Page 2

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Mediators work with parties to arrive at a mutually agreeable solution. The success rate for the program is 64% and the satisfaction rate is 90%.

Cost: BASF charges an administrative fee of \$295 per party. The hourly mediator fee beyond the first three hours will vary depending on the mediator selected. Waivers of the administrative fee are available to those who qualify. For more information, call Marilyn King at 415.782.8905, email gd@sfbar.org, or see the enclosed brochure.

(B) PRIVATE MEDIATION: Although not currently a part of the court's ADR program, civil disputes may also be resolved through private mediation. Parties may elect any private mediator or mediation organization of their choice; the selection and coordination of private mediation is the responsibility of the parties. Parties may find mediators and organizations on the Internet. The cost of private mediation will vary depending on the mediator selected.

3) ARBITRATION

An arbitrator is neutral attorney who presides at a hearing where the parties present evidence through exhibits and testimony. The arbitrator applies the law to the facts of the case and makes an award based upon the merits of the case.

(A) JUDICIAL ARBITRATION: When the court orders a case to arbitration, it is called "judicial arbitration". The goal of arbitration is to provide parties with an adjudication that is earlier, faster, less formal, and usually less expensive than a trial.

Operation: Pursuant to CCP 1141.11 and Local Rule 4, all civil actions in which the amount in controversy is \$50,000 or less, and no party seeks equitable relief, shall be ordered to arbitration. (Upon stipulation of all parties, other civil matters may be submitted to judicial arbitration.) A case is ordered to arbitration after the Case Management Conference. An arbitrator is chosen from the court's arbitration panel. Arbitrations are generally held between 7 and 9 months after a complaint has been filed. Judicial arbitration is not binding unless all parties agree to be bound by the arbitrator's decision. Any party may request a trial within 60 days after the arbitrator's award has been filed.

Local Rule 4.2 allows for mediation in lieu of judicial arbitration, so long as the parties file a stipulation to mediate after the filing of a complaint. If settlement is not reached through mediation, a case proceeds to trial as scheduled.

Cost: There is no cost to the parties for judicial arbitration.

(B) PRIVATE ARBITRATION: Although not currently a part of the court's ADR program, civil disputes may also be resolved through private arbitration. Here, the parties voluntarily consent to arbitration. If all parties agree, private arbitration may be binding and the parties give up the right to judicial review of the arbitrator's decision. In private arbitration, the parties select a private arbitrator and are responsible for paying the arbitrator's fees.

TO PARTICIPATE IN ANY OF THE COURT'S ADR PROGRAMS, PLEASE COMPLETE THE ATTACHED STIPULATION TO ALTERNATIVE DISPUTE RESOLUTION AND SUBMIT IT TO THE COURT. YOU MUST ALSO CONTACT BASF TO ENROLL IN THE LISTED BASF PROGRAMS. THE COURT DOES NOT FORWARD COPIES OF COMPLETED STIPULATIONS TO BASF.

108880321-1-5

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name and address)		FOR COURT USE ONLY
TELEPHONE NO.:		
ATTORNEY FOR (Name):		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF SAN FRANCISCO 450 Golden Gate Street San Francisco, CA 94102-4514		
PLAINTIFF/DEFENDANT		
DEFENDANT/RESPONDENT:		
STIPULATION TO ALTERNATIVE DISPUTE RESOLUTION (ADR)		CASE NUMBER DEPARTMENT #19

- 1) The parties hereby stipulate that this action shall be submitted to the following ADR process:
- Early Settlement Program of the Bar Association of San Francisco (BASF) - Pre-screened experienced attorneys provide a minimum of 2 hours of settlement conference time for a BASF administrative fee of \$250 per party. Waivers are available to those who qualify. BASF handles notification to all parties, conflict checks with the panelists, and full case management. www.sfbas.org/esp
- Mediation Services of BASF - Experienced professional mediators, screened and approved, provide one hour of preparation and the first two hours of mediation time for a BASF administrative fee of \$250 per party. Mediation time beyond that is charged at the mediator's hourly rate. Waivers of the administrative fee are available to those who qualify. BASF assists parties with mediator selection, conflict checks, and full case management. www.sfbas.org/mediation
- Private Mediation - Mediators and ADR provider organizations charge by the hour or by the day, current market rates. ADR organizations may also charge an administrative fee. Parties may find experienced mediators and organizations on the Internet.
- Judicial Arbitration - Non-binding arbitration is available to cases in which the amount in controversy is \$50,000 or less and no equitable relief is sought. The court appoints a pre-screened arbitrator who will issue an award. There is no fee for this program. www.superiorcourt.org
- Other ADR process (describe) _____
- 2) The parties agree that the ADR Process shall be completed by (date): _____
- 3) Plaintiff(s) and Defendant(s) further agree as follows:

Name of Party Stipulating

Name of Party Stipulating

Name of Party or Attorney Executing Stipulation

Name of Party or Attorney Executing Stipulation

Signature of Party or Attorney

Signature of Party or Attorney

 Plaintiff Defendant Cross-defendant Plaintiff Defendant Cross-defendant

Dated: _____

Dated: _____

 Additional signature(s) attached

ADR-2 07/12

STIPULATION TO ALTERNATIVE DISPUTE RESOLUTION

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ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address)		CA-140
		FOR COURT USE ONLY
TELEPHONE NO.: E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): SUPERIOR COURT OF CALIFORNIA, COUNTY OF: STREET ADDRESS: MAILING ADDRESS: CITY AND ZIP CODE: BRANCH NAME: PLAINTIFF/PETITIONER: DEFENDANT/RESPONDENT:		
CASE MANAGEMENT STATEMENT (Check one): <input type="checkbox"/> UNLIMITED CASE (Amount demanded exceeds \$25,000) <input type="checkbox"/> LIMITED CASE (Amount demanded is \$25,000 or less)		Case Number:
A CASE MANAGEMENT CONFERENCE is scheduled as follows: Date: _____ Time: _____ Dept: _____ Div: _____ Room: _____ Address of court (if different from the address above): _____ <input type="checkbox"/> Notice of Intent to Appear by Telephone, by (name): _____		

INSTRUCTIONS: All applicable boxes must be checked, and the specified information must be provided.

1. Party or parties (answer one):
 - This statement is submitted by party (name): _____
 - This statement is submitted jointly by parties (names): _____
2. Complaint and cross-complaint (to be answered by plaintiff and cross-complainants only)
 - a. The complaint was filed on (date): _____
 - b. The cross-complaint, if any, was filed on (date): _____
3. Service (to be answered by plaintiff and cross-complainants only)
 - a. All parties named in the complaint and cross-complaint have been served, have appeared, or have been dismissed.
 - b. The following parties named in the complaint or cross-complaint
 - (1) have not been served (specify names and explain why not): _____
 - (2) have been served but have not appeared and have not been dismissed (specify names): _____
 - (3) have had a default entered against them (specify names): _____
 - c. The following additional parties may be added (specify names, nature of involvement in case, and date by which they may be served): _____
4. Description of case
 - a. Type of case (complaint cross-complaint) (Describe, including causes of action): _____

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CM-110

PLAINTIFF/PETITIONER:	CASE NUMBER:
DEFENDANT/RESPONDENT:	

4. b. Provide a brief statement of the case, including any damages. (If personal injury damages are sought, specify the injury and damages claimed, including medical expenses to date, indicate court and amount, estimated future medical expenses, lost earnings to date, and estimated future lost earnings. If equitable relief is sought, describe the nature of the relief.)

1. 2. 3. 4. 5. 6. 7. 8. 9. 10. 11. 12. 13. 14. 15. 16. 17. 18. 19. 20. 21. 22. 23. 24. 25. 26. 27. 28. 29. 30. 31. 32. 33. 34. 35. 36. 37. 38. 39. 40. 41. 42. 43. 44. 45. 46. 47. 48. 49. 50. 51. 52. 53. 54. 55. 56. 57. 58. 59. 60. 61. 62. 63. 64. 65. 66. 67. 68. 69. 70. 71. 72. 73. 74. 75. 76. 77. 78. 79. 80. 81. 82. 83. 84. 85. 86. 87. 88. 89. 90. 91. 92. 93. 94. 95. 96. 97. 98. 99. 100. 101. 102. 103. 104. 105. 106. 107. 108. 109. 110. 111. 112. 113. 114. 115. 116. 117. 118. 119. 120. 121. 122. 123. 124. 125. 126. 127. 128. 129. 130. 131. 132. 133. 134. 135. 136. 137. 138. 139. 140. 141. 142. 143. 144. 145. 146. 147. 148. 149. 150. 151. 152. 153. 154. 155. 156. 157. 158. 159. 160. 161. 162. 163. 164. 165. 166. 167. 168. 169. 170. 171. 172. 173. 174. 175. 176. 177. 178. 179. 180. 181. 182. 183. 184. 185. 186. 187. 188. 189. 190. 191. 192. 193. 194. 195. 196. 197. 198. 199. 200. 201. 202. 203. 204. 205. 206. 207. 208. 209. 210. 211. 212. 213. 214. 215. 216. 217. 218. 219. 220. 221. 222. 223. 224. 225. 226. 227. 228. 229. 230. 231. 232. 233. 234. 235. 236. 237. 238. 239. 240. 241. 242. 243. 244. 245. 246. 247. 248. 249. 250. 251. 252. 253. 254. 255. 256. 257. 258. 259. 260. 261. 262. 263. 264. 265. 266. 267. 268. 269. 270. 271. 272. 273. 274. 275. 276. 277. 278. 279. 280. 281. 282. 283. 284. 285. 286. 287. 288. 289. 290. 291. 292. 293. 294. 295. 296. 297. 298. 299. 300. 301. 302. 303. 304. 305. 306. 307. 308. 309. 310. 311. 312. 313. 314. 315. 316. 317. 318. 319. 320. 321. 322. 323. 324. 325. 326. 327. 328. 329. 330. 331. 332. 333. 334. 335. 336. 337. 338. 339. 340. 341. 342. 343. 344. 345. 346. 347. 348. 349. 350. 351. 352. 353. 354. 355. 356. 357. 358. 359. 360. 361. 362. 363. 364. 365. 366. 367. 368. 369. 370. 371. 372. 373. 374. 375. 376. 377. 378. 379. 380. 381. 382. 383. 384. 385. 386. 387. 388. 389. 390. 391. 392. 393. 394. 395. 396. 397. 398. 399. 400. 401. 402. 403. 404. 405. 406. 407. 408. 409. 410. 411. 412. 413. 414. 415. 416. 417. 418. 419. 420. 421. 422. 423. 424. 425. 426. 427. 428. 429. 430. 431. 432. 433. 434. 435. 436. 437. 438. 439. 440. 441. 442. 443. 444. 445. 446. 447. 448. 449. 450. 451. 452. 453. 454. 455. 456. 457. 458. 459. 460. 461. 462. 463. 464. 465. 466. 467. 468. 469. 470. 471. 472. 473. 474. 475. 476. 477. 478. 479. 480. 481. 482. 483. 484. 485. 486. 487. 488. 489. 490. 491. 492. 493. 494. 495. 496. 497. 498. 499. 500. 501. 502. 503. 504. 505. 506. 507. 508. 509. 510. 511. 512. 513. 514. 515. 516. 517. 518. 519. 520. 521. 522. 523. 524. 525. 526. 527. 528. 529. 530. 531. 532. 533. 534. 535. 536. 537. 538. 539. 540. 541. 542. 543. 544. 545. 546. 547. 548. 549. 550. 551. 552. 553. 554. 555. 556. 557. 558. 559. 560. 561. 562. 563. 564. 565. 566. 567. 568. 569. 570. 571. 572. 573. 574. 575. 576. 577. 578. 579. 580. 581. 582. 583. 584. 585. 586. 587. 588. 589. 590. 591. 592. 593. 594. 595. 596. 597. 598. 599. 600. 601. 602. 603. 604. 605. 606. 607. 608. 609. 610. 611. 612. 613. 614. 615. 616. 617. 618. 619. 620. 621. 622. 623. 624. 625. 626. 627. 628. 629. 630. 631. 632. 633. 634. 635. 636. 637. 638. 639. 640. 641. 642. 643. 644. 645. 646. 647. 648. 649. 650. 651. 652. 653. 654. 655. 656. 657. 658. 659. 660. 661. 662. 663. 664. 665. 666. 667. 668. 669. 670. 671. 672. 673. 674. 675. 676. 677. 678. 679. 680. 681. 682. 683. 684. 685. 686. 687. 688. 689. 690. 691. 692. 693. 694. 695. 696. 697. 698. 699. 700. 701. 702. 703. 704. 705. 706. 707. 708. 709. 710. 711. 712. 713. 714. 715. 716. 717. 718. 719. 720. 721. 722. 723. 724. 725. 726. 727. 728. 729. 730. 731. 732. 733. 734. 735. 736. 737. 738. 739. 740. 741. 742. 743. 744. 745. 746. 747. 748. 749. 750. 751. 752. 753. 754. 755. 756. 757. 758. 759. 760. 761. 762. 763. 764. 765. 766. 767. 768. 769. 770. 771. 772. 773. 774. 775. 776. 777. 778. 779. 780. 781. 782. 783. 784. 785. 786. 787. 788. 789. 790. 791. 792. 793. 794. 795. 796. 797. 798. 799. 800. 801. 802. 803. 804. 805. 806. 807. 808. 809. 810. 811. 812. 813. 814. 815. 816. 817. 818. 819. 820. 821. 822. 823. 824. 825. 826. 827. 828. 829. 830. 831. 832. 833. 834. 835. 836. 837. 838. 839. 840. 841. 842. 843. 844. 845. 846. 847. 848. 849. 850. 851. 852. 853. 854. 855. 856. 857. 858. 859. 860. 861. 862. 863. 864. 865. 866. 867. 868. 869. 870. 871. 872. 873. 874. 875. 876. 877. 878. 879. 880. 881. 882. 883. 884. 885. 886. 887. 888. 889. 890. 891. 892. 893. 894. 895. 896. 897. 898. 899. 900. 901. 902. 903. 904. 905. 906. 907. 908. 909. 910. 911. 912. 913. 914. 915. 916. 917. 918. 919. 920. 921. 922. 923. 924. 925. 926. 927. 928. 929. 930. 931. 932. 933. 934. 935. 936. 937. 938. 939. 940. 941. 942. 943. 944. 945. 946. 947. 948. 949. 950. 951. 952. 953. 954. 955. 956. 957. 958. 959. 960. 961. 962. 963. 964. 965. 966. 967. 968. 969. 970. 971. 972. 973. 974. 975. 976. 977. 978. 979. 980. 981. 982. 983. 984. 985. 986. 987. 988. 989. 990. 991. 992. 993. 994. 995. 996. 997. 998. 999. 1000.

| CASE MANAGEMENT STATEMENT | | Page 2 of 3 |
|--|--|-------------|
| 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input type="checkbox"/> 11. <input type="checkbox"/> 12. <input type="checkbox"/> 13. <input type="checkbox"/> 14. <input type="checkbox"/> 15. <input type="checkbox"/> 16. <input type="checkbox"/> 17. <input type="checkbox"/> 18. <input type="checkbox"/> 19. <input type="checkbox"/> 20. <input type="checkbox"/> 21. <input type="checkbox"/> 22. <input type="checkbox"/> 23. <input type="checkbox"/> 24. <input type="checkbox"/> 25. <input type="checkbox"/> 26. <input type="checkbox"/> 27. <input type="checkbox"/> 28. <input type="checkbox"/> 29. <input type="checkbox"/> 30. <input type="checkbox"/> 31. <input type="checkbox"/> 32. <input type="checkbox"/> 33. <input type="checkbox"/> 34. <input type="checkbox"/> 35. <input type="checkbox"/> 36. <input type="checkbox"/> 37. <input type="checkbox"/> 38. <input type="checkbox"/> | | |

1027860 321-1-5

CM-115

| | |
|-----------------------|--------------|
| PLAINTIFF/PETITIONER: | CASE NUMBER: |
| DEFENDANT/RESPONDENT: | |

10. c. Indicate the ADR process or procedure that the party or parties are willing to participate in, have agreed to participate in, or have already participated in (check all that apply and provide the specified information):

| | The party or parties completing this form are willing to participate in the following ADR processes (check all that apply): | If the party or parties completing this form in the case have agreed to participate in or have already completed an ADR process or processes, indicate the status of the processes (attach a copy of the parties' ADR stipulation): |
|-------------------------------------|---|---|
| (1) Mediation | <input type="checkbox"/> | <input type="checkbox"/> Mediation session not yet scheduled
<input type="checkbox"/> Mediation session scheduled for (date):
<input type="checkbox"/> Agreed to complete mediation by (date):
<input type="checkbox"/> Mediation completed on (date): |
| (2) Settlement conference | <input type="checkbox"/> | <input type="checkbox"/> Settlement conference not yet scheduled
<input type="checkbox"/> Settlement conference scheduled for (date):
<input type="checkbox"/> Agreed to complete settlement conference by (date):
<input type="checkbox"/> Settlement conference completed on (date): |
| (3) Neutral evaluation | <input type="checkbox"/> | <input type="checkbox"/> Neutral evaluation not yet scheduled
<input type="checkbox"/> Neutral evaluation scheduled for (date):
<input type="checkbox"/> Agreed to complete neutral evaluation by (date):
<input type="checkbox"/> Neutral evaluation completed on (date): |
| (4) Nonbinding judicial arbitration | <input type="checkbox"/> | <input type="checkbox"/> Judicial arbitration not yet scheduled
<input type="checkbox"/> Judicial arbitration scheduled for (date):
<input type="checkbox"/> Agreed to complete judicial arbitration by (date):
<input type="checkbox"/> Judicial arbitration completed on (date): |
| (5) Binding private arbitration | <input type="checkbox"/> | <input type="checkbox"/> Private arbitration not yet scheduled
<input type="checkbox"/> Private arbitration scheduled for (date):
<input type="checkbox"/> Agreed to complete private arbitration by (date):
<input type="checkbox"/> Private arbitration completed on (date): |
| (6) Other (specify): | <input type="checkbox"/> | <input type="checkbox"/> ADR session not yet scheduled
<input type="checkbox"/> ADR session scheduled for (date):
<input type="checkbox"/> Agreed to complete ADR session by (date):
<input type="checkbox"/> ADR completed on (date): |

CM-115 (Rev. 1/1/2013)

CASE MANAGEMENT STATEMENT

PAGE 2

1022860321-1-5

CM-11b

| | |
|-----------------------|--------------|
| PLAINTIFF/PETITIONER: | CASE NUMBER: |
| DEFENDANT/RESPONDENT: | |

11. Insurance

- a. Insurance carrier, if any, for party filing this statement (name):
- b. Reservation of rights: Yes No
- c. Coverage issues will significantly affect resolution of this case (explain):

12. Jurisdiction

Indicate any matters that may affect the court's jurisdiction or processing of this case and describe the status:

- Bankruptcy Other (specify):

Status:

13. Related cases, consolidation, and coordination

- a. There are companion, underlying, or related cases:
 - (1) Name of case:
 - (2) Name of court:
 - (3) Case number:
 - (4) Status: Additional cases are described in Attachment 13a.
- b. A motion to consolidate coordinate will be filed by (name party):

14. bifurcation

- The party or parties intend to file a motion for an order bifurcating, severing, or coordinating the following issue or causes of action (specify moving party, type of motion, and reasons):

15. Other motions

- The party or parties expect to file the following motions before trial (specify moving party, type of motion, and issues):

16. Discovery

- a. The party or parties have completed all discovery.
- b. The following discovery will be completed by the date specified (specify all anticipated discovery):

| Party | Description | Date |
|-------|-------------|------|
|-------|-------------|------|

- c. The following discovery issues, including issues regarding the discovery of electronically stored information, are anticipated (specify):

1022-860321-1-5

CM-110

| | |
|-----------------------|--------------|
| PLAINTIFF/PETITIONER: | Case Number: |
| DEFENDANT/RESPONDENT: | |

17. Economic litigation

- a. This is a limited civil case (i.e., the amount demanded is \$25,000 or less) and the economic litigation procedures in Code of Civil Procedure sections 60-85 will apply to this case.
- b. This is a limited civil case and a motion to withdraw the case from the economic litigation procedures or for additional discovery will be filed. If checked, explain specifically why economic litigation procedures relating to discovery or trial should not apply to this case:

A motion to withdraw the case from the economic litigation procedures or for additional discovery will be filed.

18. Other issues

- The party or parties request that the following additional matters be considered or determined at the case management conference (specify):

19. Meet and confer

- a. The party or parties have met and conferred with all parties on all subjects required by rule 3.724 of the California Rules of Court (if not, explain):
- b. After meeting and conferring as required by rule 3.724 of the California Rules of Court, the parties agree on the following (specify):

20. Total number of pages attached (if any):

I am completely familiar with this case and will be fully prepared to discuss the status of discovery and alternative dispute resolution, as well as other issues raised by this statement, and will possess the authority to enter into stipulations on these issues at the time of the case management conference, including the written authority of the party where required.

Date:

| | |
|----------------------|----------------------------------|
| (TYPE OR PRINT NAME) | (SIGNATURE OF PARTY OR ATTORNEY) |
| (TYPE OR PRINT NAME) | (SIGNATURE OF PARTY OR ATTORNEY) |

 Additional signatures are attached.

EXHIBIT “B”

1 DAVID W. CHEN, ESQ. – State Bar No. 184071
2 **STRATMAN, PATTERSON & HUNTER**
3 Mailing Address
4 P.O. Box 258829, Oklahoma City, OK 73125-8829
5 Physical Address
6 505 14th Street, Suite 400
7 Oakland, CA 94612-1913
8 Phone: (510) 457-3440
9 Fax: (510) 238-8968
10 Attorney for Defendants,
11 RICHARD BEE AND CAROL BEE

12
13
14
15
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17
18
19
20 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
21 **FOR THE COUNTY OF SAN FRANCISCO**

22 KEITH MARTIN,
23 Plaintiff,
24
25 vs.
26 RICHARD BEE and CAROL BEE,
27 Defendants.

28 Case No.: CGC-14-543473
UNLIMITED JURISDICTION

29
30 **DEFENDANTS' REQUESTS FOR**
31 **ADMISSION**

32
33 PROPOUNDING PARTY: Defendants, RICHARD BEE AND CAROL BEE

34 RESPONDING PARTY: Plaintiff, KEITH MARTIN

35 SET NUMBER: ONE

36
37 Defendants, RICHARD BEE AND CAROL BEE, request that within thirty (30) days from the
38 date of service hereof, you answer the following requests for admission, pursuant to *Code of Civil*
39 *Procedure* section 2033.010, et seq.

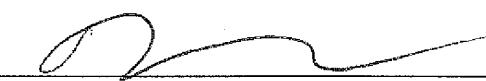
40
41 **REQUESTS**

- 42
43 1. Admit that defendant Richard Bee is not liable for your cause of action for Negligence.
44
45 2. Admit that defendant Carol Bee is not liable for your cause of action for Negligence.

- 1 3. Admit that defendant Richard Bee is not liable for your cause of action for Negligent
2 Entrustment.
- 3 4. Admit that defendant Richard Bee is not liable to you as the vehicle owner of the car operated by
4 Carol Bee.
- 5 5. Admit that defendant Richard Bee did not cause harm to you.
- 6 6. Admit that defendant Carol Bee did not cause harm to you.
- 7 7. Admit that you suffered on physical injury as a result of the accident with Carol Bee on January
8, 2013.
- 9 8. Admit that you suffered no pain as a result of the accident with Carol Bee on January 3, 2013.
- 10 9. Admit that you did not require any medical care as a result of the accident with Carol Bee on
11 January 3, 2013.
- 12 10. Admit that you suffered no harm as a result of the accident with Carol Bee on January 3, 2013.
- 13 11. Admit that you did not suffer any wage loss as a result of the accident with Carol Bee on January
14 3, 2013.
- 15 12. Admit that you did not suffer any loss of income capacity as a result of the accident with Carol
16 Bee on January 3, 2013.

17
18
19 DATED: December 1, 2015

STRATMAN, PATTERSON & HUNTER

20 BY: 

21 DAVID W. CHEN, ESQ.
22 Attorney for Defendants,
23 RICHARD BEE AND CAROL BEE

24
25
26
27
28

1 Re: Martin v. Bee, et al.
2 Case Number: CGC-14-543473

3
4 **PROOF OF SERVICE**
5 **Code of Civil Procedure §§ 1013a, 2015.5**

6 I am a resident of the State of California and over the age of eighteen years, and not a party to the
7 within action. My business address is 505 14th Street, Suite 400, Oakland, CA 94612-1913. On
8 December 1, 2015, I served the following document(s):

9
10 **REQUESTS FOR ADMISSION**

11 By placing the document(s) listed above in a sealed envelope, addressed as set forth
12 below, and placing the envelope for collection and mailing in the place designated for
13 such in our offices, following ordinary business practices.

14 By transmitting via facsimile the document(s) listed above to the fax number(s) set
15 forth below on this date before 5:00 p.m.

16 By causing a true copy thereof to be personally delivered to the person(s) at the
17 address(es) set forth below.

18 By electronically serving the document(s) described above via a Court approved File
19 & Serve vendor on those recipients designated on the Transaction Receipt located on
20 the vendor's Website.

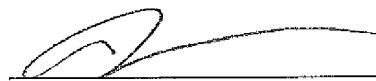
21 By electronically serving the document(s) to the electronic mail address set forth
22 below on this date before 5:00 p.m. pursuant to the signed stipulation of the parties
23 and consistent with Code of Civil Procedure section 1010.6(a)(2).

24 **SEE ATTACHED SERVICE LIST**

25 I am readily familiar with the firm's practice of collection and processing correspondence for
26 mailing with the United States Postal Service. Under that practice, it would be deposited with U.S.
27 Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I
28 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.

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

Executed on December 1, 2015, at Oakland, California.


25
26 DAVID WEI CHEN
27
28

1 Re: Martin v. Bee, et al.
2 Case Number: CGC-14-543473

3 **SERVICE LIST**

4 Keith Martin, in pro per
5 1208 Sir Francis Drake Blvd, #2
6 San Anselmo, CA 94960
7 Phone: (415) 637-7495

8

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27

28

EXHIBIT “C”

1 DAVID W. CHEN, ESQ. – State Bar No. 184071
2 STRATMAN, PATTERSON & HUNTER
3 Mailing Address
4 P.O. Box 258829, Oklahoma City, OK 73125-8829
5 Physical Address
6 505 14th Street, Suite 400
7 Oakland, CA 94612-1913
Phone: (510) 457-3440
Fax: (510) 238-8968
8 Attorney for Defendants,
9 RICHARD BEE AND CAROL BEE

ENDURED
FILED
San Francisco County Superior Court

FEB - 4 2016

CLERK OF THE COURT
By: *C. Hembrey*
Deputy Clerk

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF SAN FRANCISCO**

11 KEITH MARTIN,
12 Plaintiff,
13 vs.
14
15 RICHARD BEE and CAROL BEE,
16 Defendants.

Case No.: CGC-15-543473
UNLIMITED JURISDICTION

**ORDER TO COMPEL PLAINTIFF'S
ATTENDANCE AT DEPOSITION AND
REQUEST FOR REASONABLE SANCTIONS
AND ATTORNEY FEES**

17 Defendants' Motion to Compel Plaintiff's Attendance at Deposition and Request for Reasonable
18 Sanctions and Attorney's Fees was heard on February 4, 2016, by Judge Pro Tem James Fleming of the
19 above Court. After considering the papers on file herein, IT IS HEREBY ORDERED, as follows:

20 The motion is unopposed. Accordingly, Plaintiff Keith Martin is ordered to attend a deposition at
21 the offices of Stratman, Patterson & Hunter, 505 14th Street, Suite 400, Oakland, CA 94612-1913, on
22 February 8, 2016, at 9:00 am or on another mutually convenient date on or before February 14, 2016. In
23 addition, Plaintiff Keith Martin shall pay sanctions of \$587, representing attorneys' fees and court
24 reporter's fees and expenses incurred for Plaintiff Keith Martin's failure to appear at the previously
25 noticed deposition and reasonable attorneys' fees and costs incurred for making this motion, to Stratman,
26 Patterson & Hunter, counsel to defendants Richard Bee and Carol Bee, on or before February 24, 2016.
27

28 DATED: *Feb 4, 2016*

J. Hembrey
JUDGE OF THE SUPERIOR COURT

1 DAVID W. CHEN, ESQ. – State Bar No. 184071
2 STRATMAN, PATTERSON & HUNTER
3 Mailing Address
4 P.O. Box 258829, Oklahoma City, OK 73125-8829
5 Physical Address
6 505 14th Street, Suite 400
7 Oakland, CA 94612-1913
Phone: (510) 457-3440
Fax: (510) 238-8968
8 Attorney for Defendants,
9 RICHARD BEE AND CAROL BEE

EMPOWERED
FILED
San Francisco County Superior Court

FEB - 4 2016

CLERK OF THE COURT
By: D. HERNANDEZ
Deputy Clerk

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9
10 FOR THE COUNTY OF SAN FRANCISCO

11 KEITH MARTIN,
12 Plaintiff,
13 vs.
14 RICHARD BEE and CAROL BEE,
15 Defendants.

Case No.: CGC-15-543473
UNLIMITED JURISDICTION

ORDER ESTABLISHING ADMISSIONS AND
FOR MONETARY SANCTION

18 Defendants' Motion for Order Establishing Admissions and for Monetary Sanctions was heard
19 on February 4, 2016, by Judge Pro Tem James Fleming of the above Court.
20

21 After considering the papers on file herein, IT IS HEREBY ORDERED, as follows:

22 The motion is unopposed. Accordingly, the truth of each matter specified in the request for
23 admission served on Plaintiff Keith Martin on December 1, 2015 is hereby deemed admitted. In
24 addition, Plaintiff Keith Martin shall pay sanctions of \$300, representing reasonable attorneys' fees and
25 costs incurred for making this motion, to Stratman, Patterson & Hunter, counsel to defendants Richard
Bee and Carol Bee, on or before February 24, 2016. Counsel for moving party shall submit an order
27 consistent with the foregoing.

28 DATED: Feb 4, 2016

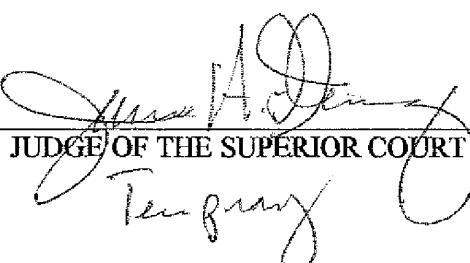

JUDGE OF THE SUPERIOR COURT

EXHIBIT “D”

Law Offices of
STRATMAN, PATTERSON & HUNTER

Scott Caple Stratman
Managing Attorney

Frederick A. Patterson
David E. Hunter III

John D. Hourihan
Edward J. Rodzewich
Robert M. Maltz

Not a Partnership
Employees of Farmers Insurance Exchange,
a Member of the Farmers Insurance Group of Companies

Mailing Address
PO BOX 258829
Oklahoma City, OK, 73125-8829

Physical Address
505 14th Street, Suite 400
Oakland, CA 94612-1913

Telephone (510) 457-3440
Facsimile: (510) 238-8968

David W. Chen
Zachary Smith
Victoria E. Townsend
Sabrina M. Berdux
Nairi Paterson
P. Richard Colombatto
Ryan L. Kraft
Amy E. Bracher
Brennain J. Garber

**Please Reference Our File # in Your Correspondence
Documents Can be Sent to legaldocs@farmers.com**

February 4, 2016

Keith Martin
in Pro Per
1222 Sir Francis Drake Boulevard
San Anselmo, CA 94960-1760

Re: Martin v. Bee, et al.
Case No.: CGC-15-543473
Our File No.: 15-370008

Dear Mr. Martin:

The court today ordered your deposition to take place no later than February 14, 2016. To that end, I am going to offer February 10 at 1:30 p.m and February 11 at 1:30 p.m. The location will be 505 14th Street, suite 400, Oakland, CA 94806. If you do not get back to me by e-mail by the close of business on February 8, 2016, then I will set it for February 11, 2016 at 1:30 p.m.

Sincerely,



David W. Chen
Direct Line: (510) 457-3442
Cell: (510) 402-8918
Email: david.chen@farmersinsurance.com
DWC/dwc

1 DAVID W. CHEN, ESQ. – State Bar No. 184071
2 STRATMAN, PATTERSON & HUNTER
3 Mailing Address
4 P.O. Box 258829, Oklahoma City, OK 73125-8829
5 Physical Address
6 505 14th Street, Suite 400
7 Oakland, CA 94612-1913
Phone: (510) 457-3440
Fax: (510) 238-8968
8 Attorney for Defendants,
9 RICHARD BEE AND CAROL BEE

ENDOKED
FILED
San Francisco County Superior Court

FEB - 4 2016

CLERK OF THE COURT
By: J. H. Hennet
Deputy Clerk

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9
10 FOR THE COUNTY OF SAN FRANCISCO

11 KEITH MARTIN,
12 Plaintiff,
13 vs.
14 RICHARD BEE and CAROL BEE,
15 Defendants.

Case No.: CGC-15-543473
UNLIMITED JURISDICTION

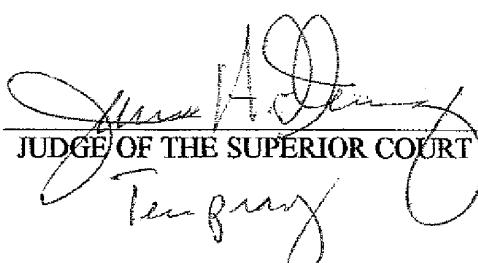
ORDER ESTABLISHING ADMISSIONS AND
FOR MONETARY SANCTION

18 Defendants' Motion for Order Establishing Admissions and for Monetary Sanctions was heard
19 on February 4, 2016, by Judge Pro Tem James Fleming of the above Court.

20 After considering the papers on file herein, IT IS HEREBY ORDERED, as follows:

21 The motion is unopposed. Accordingly, the truth of each matter specified in the request for
22 admission served on Plaintiff Keith Martin on December 1, 2015 is hereby deemed admitted. In
23 addition, Plaintiff Keith Martin shall pay sanctions of \$300, representing reasonable attorneys' fees and
24 costs incurred for making this motion, to Stratman, Patterson & Hunter, counsel to defendants Richard
25 Bee and Carol Bee, on or before February 24, 2016. Counsel for moving party shall submit an order
26 consistent with the foregoing.

27
28 DATED: Feb 4, 2016


JUDGE OF THE SUPERIOR COURT

1 DAVID W. CHEN, ESQ. – State Bar No. 184071
2 STRATMAN, PATTERSON & HUNTER
3 Mailing Address
4 P.O. Box 258829, Oklahoma City, OK 73125-8829
5 Physical Address
6 505 14th Street, Suite 400
7 Oakland, CA 94612-1913
Phone: (510) 457-3440
Fax: (510) 238-8968
8 Attorney for Defendants,
9 RICHARD BEE AND CAROL BEE

ENDO/LSB
FILED
San Francisco County Superior Court

FEB - 4 2016

CLERK OF THE COURT

By: *C. Hembert*
Deputy Clerk

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9
10 **FOR THE COUNTY OF SAN FRANCISCO**

11 KEITH MARTIN,

Case No.: CGC-15-543473
UNLIMITED JURISDICTION

12 Plaintiff,

13 vs.

14 **ORDER TO COMPEL PLAINTIFF'S
15 ATTENDANCE AT DEPOSITION AND
16 REQUEST FOR REASONABLE SANCTIONS
17 AND ATTORNEY FEES**

18 RICHARD BEE and CAROL BEE,

19 Defendants.

20 Defendants' Motion to Compel Plaintiff's Attendance at Deposition and Request for Reasonable
21 Sanctions and Attorney's Fees was heard on February 4, 2016, by Judge Pro Tem James Fleming of the
22 above Court. After considering the papers on file herein, IT IS HEREBY ORDERED, as follows:

23 The motion is unopposed. Accordingly, Plaintiff Keith Martin is ordered to attend a deposition at
24 the offices of Stratman, Patterson & Hunter, 505 14th Street, Suite 400, Oakland, CA 94612-1913, on
25 February 8, 2016, at 9:00 am or on another mutually convenient date on or before February 14, 2016. In
addition, Plaintiff Keith Martin shall pay sanctions of \$587, representing attorneys' fees and court
reporter's fees and expenses incurred for Plaintiff Keith Martin's failure to appear at the previously
noticed deposition and reasonable attorneys' fees and costs incurred for making this motion, to Stratman,
Patterson & Hunter, counsel to defendants Richard Bee and Carol Bee, on or before February 24, 2016.

26 DATED: *Feb 4, 2016*

James H. Fleming
JUDGE OF THE SUPERIOR COURT

1 Re: Martin v. Bee, et al.
2 Case Number: CGC-15-543473

3
4 **PROOF OF SERVICE**
5 **Code of Civil Procedure §§ 1013a, 2015.5**

6
7 I am a resident of the State of California and over the age of eighteen years, and not a party to the
8 within action. My business address is 505 14th Street, Suite 400, Oakland, CA 94612-1913. On April
9 20, 2016, I served the following document(s):

10
11 **NOTICE OF LODGMENT OF EXHIBITS IN SUPPORT OF MOTION FOR**
12 **SUMMARY JUDGMENT BY DEFENDANTS RICHARD BEE AND CAROL**
13 **BEE and EXHIBITS A-D**

14 By placing the document(s) listed above in a sealed envelope, addressed as set forth
15 below, and placing the envelope for collection and mailing in the place designated for
16 such in our offices, following ordinary business practices.

17 By transmitting via facsimile the document(s) listed above to the fax number(s) set
18 forth below on this date before 5:00 p.m.

19 By causing a true copy thereof to be personally delivered to the person(s) at the
20 address(es) set forth below.

21 By electronically serving the document(s) described above via a Court approved File
22 & Serve vendor on those recipients designated on the Transaction Receipt located on
23 the vendor's Website.

24 By electronically serving the document(s) to the electronic mail address set forth
25 below on this date before 5:00 p.m. pursuant to the signed stipulation of the parties
and consistent with Code of Civil Procedure section 1010.6(a)(2).

26 **SEE ATTACHED SERVICE LIST**

27 I am readily familiar with the firm's practice of collection and processing correspondence for
28 mailing with the United States Postal Service. Under that practice, it would be deposited with U.S.
Postal Service on that same day with postage thereon fully prepaid 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.

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

31 Executed on April 20, 2016, at Oakland, California.

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2 Re: Martin v. Bee, et al.
3 Case Number: CGC-15-543473

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6
7 **SERVICE LIST**

8
9
10 Charles A. Bonner, Esq.
11 Law Offices of Bonner & Bonner
12 475 Gate Five Road, Suite 212
13 Sausalito, CA 94965
14 Attorney for Plaintiff, Keith Martin
15 Phone: (415) 331-3070
16 Fax: (415) 331-2738