

1 DAVID R. DONADIO, ESQ., S.B. #154436  
2 NANCY T. WILLIAMS, ESQ., S.B. #201095  
3 [nwilliams@braytonlaw.com](mailto:nwilliams@braytonlaw.com)  
4 BRAYTON♦PURCELL LLP  
5 Attorneys at Law  
222 Rush Landing Road  
Post Office Box 6169  
Novato, California 94948-6169  
(415) 898-1555  
6 Attorneys for Plaintiff

6 || Attorneys for Plaintiff

## ELECTRONICALLY

FILED

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

11/02/2021

**Clerk of the Court**

NUNEZ

**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN FRANCISCO**

1 YSIDRO LIMON, SR.,  
2 Plaintiff,  
3 vs.  
4 AMCORD, INC., et al.,  
5 Defendants.

**ASBESTOS**  
No. CGC-15-276378

**DECLARATION OF NANCY T.  
WILLIAMS IN SUPPORT OF EX PARTE  
APPLICATION FOR ORDER ADDING  
CASE TO DECEMBER 16, 2021 STATUS  
AND SETTING CONFERENCE**

Date: November 4, 2021  
Time: 11:00 a.m.  
Dept.: 503, Hon. Cynthia Ming-mei Lee  
Trial Date: N/A  
Action Filed: January 2, 2015

I, Nancy T. Williams, declare:

21       1. I am an attorney at law duly licensed to practice before all courts in the State of  
22 California and am an associate in the law firm of Brayton♦Purcell LLP, attorneys for Plaintiffs.  
23       2. Plaintiff YSIDRO LIMON, SR., hereby applies for an order adding case to the  
24 December 16, 2021 Status and Setting Conference scheduled for Brayton♦Purcell LLP cases.  
25 Plaintiff makes this request based upon the good cause shown in this Application and the  
26 accompanying Declaration of Nancy T. Williams and upon oral argument as needed at hearing on  
27 plaintiff's Application.

28 | //

3. On January 2, 2015, plaintiff YSIDRO LIMON, SR., filed a personal injury lawsuit to recover for injuries suffered due to his exposure to asbestos.

3       4. Defendant C.F. BOLSTER COMPANY was served with the Summons and  
4 Complaint on March 12, 2015, and on May 13, 2015, a default was entered as to defendant C.F.  
5 BOLSTER COMPANY.

6           5. On July 14, 2017, the matter was reported as being resolved as to all active  
7 defendants and the matter was removed from the Court's calendar.

8        6. On September 16, 2021, Great American Insurance Company, in its Capacity as  
9    Liability Insurer for C.F. Bolster Company, obtained an order granting leave to file a Complaint  
10   In Intervention. The Complaint in Intervention was filed on September 27, 2021.

11           7. It is appropriate for this matter to be placed back on the Court's calendar so plaintiff  
12 may proceed against C.F. BOLSTER COMPANY.

13       8. Notice of this Application, including a request to be notified as to whether any  
14 opposition will be made, was given to all defendants before 10:00 a.m. Wednesday, November 3,  
15 2021 (See Declaration of Claudia Lucio attached hereto as Exhibit A.) The service list  
16 accompanying the Application states the names, addresses, and telephone and facsimile numbers  
17 of the attorneys for defendants in this action. At this time, we are not aware of any opposition to  
18 this application.

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

21 Executed on November 2, 2021 at Novato, California.

*Loyd Miller*

Nancy T. Williams

# **EXHIBIT A**

1 DAVID R. DONADIO, ESQ., S.B. #154436  
2 NANCY T. WILLIAMS, ESQ., S.B. #201095  
3 [nwilliams@braytonlaw.com](mailto:nwilliams@braytonlaw.com)  
4 BRAYTON♦PURCELL LLP  
5 Attorneys at Law  
222 Rush Landing Road  
Post Office Box 6169  
Novato, California 94948-6169  
(415) 898-1555  
6 Attorneys for Plaintiff

6 || Attorneys for Plaintiff

**SUPERIOR COURT OF CALIFORNIA  
COUNTY OF SAN FRANCISCO**

11 YSIDRO LIMON, SR.,  
12 Plaintiff,  
13 vs.  
14 AMCORD, INC., et al.,  
15 Defendants.

**ASBESTOS**  
No. CGC-15-276378

**DECLARATION OF CLAUDIA LUCIO IN  
SUPPORT OF EX PARTE APPLICATION  
FOR ORDER ADDING CASE TO  
DECEMBER 16, 2021 STATUS AND  
SETTING CONFERENCE**

Date: November 4, 2021  
Time: 11:00 a.m.  
Dept.: 503, Hon. Cynthia Ming-mei Lee  
Trial Date: N/A  
Action Filed: January 2, 2015

I, Claudia Lucio, declare:

20           1. I am over the age of 18, am not a party to the within action, and am employed with  
21 the law firm of Brayton♦Purcell LLP.

22           2. Before 10:00 a.m. Wednesday, November 3, 2021, I e-served via File & ServeXpress  
23 a letter to the offices of counsel for all defendants in this action, informing them that Plaintiff's  
24 counsel intended to appear before this Court to apply for an Order Adding Case to the December  
25 16, 2021 Status Conference.

26 | //

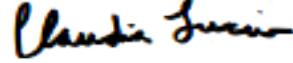
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1           3. This letter included the information that the application would be made in Room 503  
2 of the San Francisco Superior Court, on Thursday, November 4, 2021, at 11:00 a.m. I e-served  
3 the letter to the offices of counsel for defendants as shown on the service list attached.

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

6           Executed on November 2, 2021, at Novato, California.

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9           Claudia Lucio

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# **Brayton Purcell LLP**

## TRIAL LAWYERS

ALAN R. BRAYTON  
GILBERT L. PURCELL\*

DAVID R. DONADIO  
JAMES P. NEVIN\*\*

OF COUNSEL  
JOHN P. MASON  
GARY L. BRAYTON  
RICHARD M. GRANT

\* ADMITTED IN CALIFORNIA AND WASHINGTON, D.C.  
\*\* ADMITTED IN CALIFORNIA AND WASHINGTON  
\*\*\* ADMITTED IN CALIFORNIA AND UTAH

222 Rush Landing Road  
P O Box 6169  
Novato, California 94948-6169  
Telephone: (415) 898-1555  
Facsimile: (415) 898-1247

Los Angeles: (415) 898-1555  
Salt Lake City: (801) 521-1712

Email: mail@braytonlaw.com  
www.braytonlaw.com

ANDREW CHEW  
KIMBERLY J. CHU\*\*  
HUGH C. COOK  
ERICA L. FALKNER  
JANINE M. FIEL-COSSE  
CURT F. HENNECKE  
BRANDY A. HILLMAN-AZEVEDO  
BRYN G. LETSCH  
DANIEL J. MORSE\*\*\*

STEVEN J. PATTI  
VINEETH S. PILLAI  
BRENDA D. POSADA  
CHRISTINE A. RENKEN  
JASON M. ROSE  
GEOFF T. SLONIKER  
ERIC C. SOLOMON  
PHILIP VAN AELSTYN  
NANCY T. WILLIAMS  
GARY V. JUDD (1952-2019)

November 2, 2021

## VIA FILE & SERVEXPRESS

### ALL DEFENSE COUNSEL

Re: Ysidro Limon, Sr. v. Amcord, Inc., et al.  
San Francisco Superior Court Case No. CGC-15-276378

Dear Counsel:

Please take notice on Thursday, November 4, 2021, at 11:00 a.m. in Department 503 of San Francisco Superior Court, plaintiff will apply *ex parte* for an Order adding case to the December 16, 2021 Status and Setting Conference.

In accordance with California Rules of Court, Rule 3.1204(c), please inform us immediately if you intend to oppose plaintiff's *ex parte* Application.

Very truly yours,

/s/

Nancy T. Williams

NTW:ccl

## **Brayton-Purcell Service List**

Date Created: 11/02/2021 11:26 AM

Matter Numbers: 120127.001-Ysidro Limon, Sr.

Run by: Claudia Lucio

**Berkes Crane Robinson & Seal, LLP**

515 S. Figueroa Street, # 1500

Los Angeles, CA 90071

213-955-1150 213-955-1155 (fax)

**Defendants**

Great American Insurance Company, in its Capacity as Liability Insurer for C.F.  
Bolster Company (GRECFB)

**Spanos Przetak**

475 14th Street, Suite 550

Oakland, CA 94612

510-250-0200 510-380-6354 (fax)

**Defendants**