

ALAN R. BRAYTON, ESQ., S.B. #73685
DAVID R. DONADIO, ESQ., S.B. #154436
NANCY T. WILLIAMS, ESQ., S.B. #201095
NWilliams@braytonlaw.com
BRAYTON♦PURCELL LLP
Attorneys at Law
222 Rush Landing Road
P.O. Box 6169
Novato, California 94948-6169
(415) 898-1555
(415) 898-1247 (Fax No.)

Attorneys for Plaintiff

SUPERIOR COURT OF CALIFORNIA

COUNTY OF SAN FRANCISCO

YSIDRO LIMON, SR.,

Plaintiff,

vs.

AMCORD, INC., et al.,

Defendants.

ASBESTOS

No. CGC-15-276378

REQUEST FOR WAIVER OF PERSONAL
APPEARANCE OF YSIDRO LIMON AT
DEFAULT PROVE UP HEARING

Hearing Date: September 21, 2017

Time: 9:00 a.m.

Dept.: 514, Hon. Stephen M. Murphy

Trial Date: Not Applicable

Filing Date: January 2, 2015

This matter involves damages in connection with plaintiff's exposure to asbestos containing products supplied by defendants CARROLL DUNCAN & CO., C.F. BOLSTER COMPANY, E.S. BROWNING CO., and K & R AUTOMOTIVE and/or installed and/or disturbed by said defendants as a contractor or supplier. Such exposure contributed to cause plaintiff's asbestos-related disease.

Defendants were each served with summons and complaint but did not answer or otherwise respond and are each in default. Plaintiff has filed for entry of default judgments. Plaintiff's motion for Default Judgment and Prove up is set for hearing on September 21, 2017. The evidence in support of the plaintiff's damages is set forth in plaintiff's application, memorandum and supporting declaration and exhibits thereto.

Plaintiff respectfully requests that the Court waive the *personal appearance of the actual plaintiff* at the Default Prove Up hearing. **Counsel for Plaintiff will appear for oral**

1 **argument.** The facts pertaining to the damages will be presented through the evidence attached
2 to the Declaration of Nancy T. Williams, including the testimony of plaintiff in support of default
3 judgment.

4 Plaintiff respectfully requests that the Court waive plaintiff's appearance for the Default
5 Prove up hearing. Plaintiff will be represented by counsel at the hearing.

6 Dated: July 26, 2017

BRAYTON❖PURCELL LLP

7
8 By: /s/ Nancy T. Williams
9 Nancy T. Williams
Attorneys for Plaintiff
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28