Zachary T. Tyson (SBN 211185)

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Attorney for >

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO, CENTRAL DIVISION

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| >CHRISTOPHER HAO-KEPPEL, on behalf of the State of California, as a private attorney general,  Plaintiff,  v.  >DESERT AUTO GROUP V, LLC; a business entity form unknown, and DOES 1 through 25, Inclusive,  Defendant. | Case No. >37-2022-00044571-CU-OE-CTL  Reservation Number: 3018765  Judge: Hon. Michael T. Smyth  Dept.: >C-67  >Christopher Hao-Keppel’S NOTICE OF MOTION AND MOTION FOR ORDERS: (1) COMPELLING NANCY ABDOU TO PROVIDE FURTHER RESPONSES, WITHOUT A PRELIMINARY STATEMENT OR GENERAL OBJECTIONS, TO FORM INTERROGATORIES – EMPLOYMENT LAW (SET ONE); and, (2) MONETARY SANCTIONS AGAINST LUX, INN, LLC, NANCY ABDOU AND/OR ATTORNEY SETH BOBROFF  Hearing Date: >  Hearing Time: >  Filing Date: >November 03,2022  Trial Date: December 09,2024 > |

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on \_\_\_\_\_\_\_\_\_\_\_\_\_\_ at 1:30 p.m., or as soon thereafter as the matter can be heard, in Department > of the above-captioned court, located at 330 West Broadway, San Diego, California 92101, plaintiff > moves this Court pursuant to Code of Civil Procedure (“C.C.P.”) §§ 2023.010(d) through (f), 2030.30 and 2030.300 for Orders: (1) Compelling NANCY ABDOU to provide, without a Preliminary Statement or General Objections, further responses to Form Interrogatories – Employment Law (Set One); and, (2) Awarding monetary sanctions against defendant NANCY ABDOU and/or attorney SETH BOBROFF.

This motion will be based upon this Notice, the accompanying Memorandum of Points and Authorities, Declaration of Zachary T. Tyson, and [Proposed] Order.

LAW OFFICE OF ZACHARY T. TYSON

Dated: September 7, 2023

By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Zachary T. Tyson

Attorney for >