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Attorney for X

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

|  |  |
| --- | --- |
| X,  Plaintiff,  v.  X,  Defendants. | Case No.  **SEPARATE STATEMENT**  Judge: X  Dept.: X  Complaint Filed: X  Trial Date: X  Hearing Date: X  Hearing Time: X |
|  |  |

Pursuant to California Rules of Court, Rule 3.1345 and California Code of Civil Procedure (“C.C.P.”) § 2031.310 *et seq*., plaintiff> respectfully submits the following separate statement in support of her motion to compel further responses to Defendant > Response to Request for Production of Documents (Set One).

**SEPARATE STATEMENT**

|  |  |
| --- | --- |
| FROG-E1, NO. 201.1 | RESPONESE TO FROG-E1, NO. 201.1 |
| Was the EMPLOYEE involved in a TERMINATION? If so:   1. state all reasons for the EMPLOYEE’S TERMINATION; 2. state the name, ADDRESS, and telephone number of each PERSON who provided any information relied upon in the TERMINATION decision; and 3. state the name, ADDRESS, and telephone number of each PERSON who provided any information relied upon in the TERMINATION decision; and 4. identify all DOCUMENTS relied upon in the TERMINATION decision. | On information and belief, yes. Discovery and investigation are ongoing. |

REASONS WHY FURTHER RESPONSES SHOULD BE COMPELLED:

LAW OFFICE OF ARTHUR R. BOTHAM

LAW OFFICE OF ZACHARY T. TYSON

DATED: 4/29/24

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

Arthur R. Botham

Zachary T. Tyson

Attorney for

PROOF OF SERVICE

v. DEFENDANT

S.D.S.C. Case No.

I am employed in the County of San Diego, State of California. I am over the age of eighteen (18) years and I am not a party to the action herein. My business address is 2169 First Avenue, San Diego, CA 92101. I caused the foregoing document(s) described as: REQUEST FOR PRODUCTION OF DOCUMENTS (SET ONE) to be served on the interested parties in this action as follows:

DC\_NAME

DC\_FIRM

DC\_ADDRESS

DC\_CITY, DC\_STATE DC\_ZIP