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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| ,  Plaintiff,  v.  ,  Defendant. | Case No.  SEPARATE STATEMENT  Judge:  Dept.:  Filing Date:  Trial Date: |

Pursuant to California Rules of Court, Rule 3.1345 and California Code of Civil Procedure (“C.C.P.”) § 2033.300 *et seq.*, plaintiff PLAINTIFF: respectfully submits the following separate statement in support of HISHER: motion to compel further responses.

SEPARATE STATEMENT

|  |  |
| --- | --- |
| REQUEST FOR | RESPONSE TO |
|  |  |

REASONS WHY FURTHER RESPONSES SHOULD NOT BE COMPELLED:

Defendant is not in compliance with . . .

LAW OFFICE OF ZACHARY T. TYSON

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

Zachary T. Tyson