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ELECTRONICALLY FILED
Superior Court of California,
County of Orange
06/24/2019 at 04:19:00 PM
Clerk of the Superior Court
By e Clerk, Deputy Clerk

5 **Attorneys for Defendant ROSS REZAEI and Defendant and Cross-Complainant**
ADVANCE OCCUPATIONAL AND HAND THERAPY CENTER dba SEVENTO7
6 **PHYSICAL & HAND THERAPY**

7
8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF ORANGE, NORTH JUSTICE CENTER**
10

11 WAJIA GHAFoori; and
LAW OFFICES OF MARK B.
12 PLUMMER, PC,

13 Plaintiffs,

14 vs.

15 ROSS REZAEI;
SEVENTO7 PHYSICAL & HAND
16 THERAPY; and
DOES 1 through 100, inclusive,
17

Defendants.

Case No. 30-2018-01014163-CU-CO-NJC
Assigned to Hon. Craig L. Griffin, Dept. N-17
Action Filed: August 22, 2018

**NOTICE OF RULING RE MOTIONS TO
COMPEL AND REQUEST FOR
SANCTIONS**

Date: June 24, 2019
Time: 2:00 p.m.
Dept.: N-05

Trial Date: January 6, 2020

19 ADVANCE OCCUPATIONAL AND HAND
THERAPY CENTER dba SEVENTO7
20 PHYSICAL & HAND THERAPY,

21 Cross-Complainant,

22 vs.

23 WAJIA GHAFoori;
MARK B. PLUMMER;
24 LAW OFFICES OF MARK B. PLUMMER,
PC; and
25 ROES 1 through 50, inclusive,

26 Cross-Defendants.
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1 **PLEASE TAKE NOTICE** that on June 24, 2019, the motions of Defendant and Cross-
2 Complainant ADVANCE OCCUPATIONAL AND HAND THERAPY CENTER dba
3 SEVENTO7 PHYSICAL & HAND THERAPY (“ADVANCE”) to compel Plaintiff WAJIA
4 GHAFoori to provide verified responses to (1) Requests for Admission (Set One), (2) Request
5 for Production (Set One), (3) Special Interrogatories (Set One) and (4) Form Interrogatories (Set
6 One) and request for an award of monetary sanctions came on for hearing, the Honorable Craig L.
7 Griffin presiding. Elmira R. Howard appeared on behalf of ADVANCE. Mark B. Plummer
8 appeared on behalf of WAJIA GHAFoori.

9 After reviewing the moving papers, the Court issued its tentative ruling. Based upon the
10 parties’ stipulation presented to the Court at the hearing, the Court’s tentative was modified to the
11 following which has now become the Court’s final ruling:

12 1. The Motions are granted in part. Plaintiff WAJIA GHAFoori is ordered to
13 provide verified responses to the Special Interrogatories and Form Interrogatories, without
14 objections, by July 8, 2019.

15 2. Plaintiff WAJIA GHAFoori is ordered to serve a privilege log for any material
16 withheld from production based on a privileged objection by July 8, 2019.

17 3. Plaintiff WAJIA GHAFoori and her counsel of record, Mark B. Plummer of the
18 Law Offices of Mark B. Plummer PC are ordered to pay monetary sanctions in the amount of
19 **\$4,000.00** to Defendant ADVANCE OCCUPATIONAL AND HAND THERAPY CENTER dba
20 SEVENTO7 PHYSICAL & HAND THERAPY c/o Anderson, McPharlin & Connors LLP, 707
21 Wilshire Blvd., Suite 4000, Los Angeles, California 90017 within 30 days of receiving notice of
22 this ruling. WAJIA GHAFoori, and her counsel Mark B. Plummer and the Law Offices of Mark
23 B. Plummer PC are jointly and severally liable for the payment of the above **\$4,000** monetary
24 sanctions to ADVANCE. The monetary sanctions are awarded as a result of ADVANCE having
25 to file four motions to compel GHAFoori’s discovery responses.

26 4. The request for sanctions against ADVANCE and its counsel requested in
27 GHAFoori’s oppositions is denied.

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5. Counsel for ADVANCE was ordered to give notice.

DATED: June 24, 2019

ANDERSON, McPHARLIN & CONNERS LLP

By: 

Elmira R. Howard

Attorneys for Defendant ROSS REZAEI and
Defendant and Cross-Complainant ADVANCE
OCCUPATIONAL AND HAND THERAPY CENTER
dba SEVENTO7 PHYSICAL & HAND THERAPY

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of eighteen years and not a party to the within action; my business address is 707 Wilshire Boulevard, Suite 4000, Los Angeles, California 90017-3623.

On June 24, 2019, I served the following document(s) described as **NOTICE OF RULING RE MOTIONS TO COMPEL AND REQUEST FOR SANCTIONS** on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes addressed as follows:

Mark B. Plummer, Esq. Law Offices of Mark B. Plummer, PC 18552 Oriente Drive Yorba Linda, CA 92886 Telephone: (714) 970-3131 Facsimile: (714) 970-3130 E-Mail: lombp.law@gmail.com	Attorneys for Plaintiffs Wajia Ghafoori and Law Offices of Mark B. Plummer, PC
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BY MAIL: I am “readily familiar” with Anderson, McPharlin & Connors’ practice for collecting and processing correspondence for mailing with the United States Postal Service. Under that practice, it would be deposited with the United States Postal Service that same day in the ordinary course of business. Such envelope(s) were placed for collection and mailing with postage thereon fully prepaid at Los Angeles, California, on that same day following ordinary business practices.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on June 24, 2019, at Los Angeles, California.

Irma L. Raygoza