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7
8 Attorney for JAIME DeJESUS GONZALEZ, Trustee
9 of THE MANSDORF FAMILY TRUST

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF VENTURA

COUNTY LINE HOLDINGS, LLC, a
Delaware limited liability
company,

Plaintiff,

v.

JAIME DeJESUS GONZALEZ, an
individual, JANICE M.
McCLANAHAN, an individual;
BEAU-MAISON, INC., a
California corporation; MALIBU
HILLS RANCH, a Nevada
corporation; MALIBU HILLS
RANCH CORP, a Nevada
corporation; MALIBU HILLS
RANCH INC., a corporation of
unknown origin and/or
fictitious business entity;
COUNTY OF ORANGE (CALIFORNIA);
CAPITAL ONE N.A., a national
banking association; GERALD H.
LUSHING, an individual; RONALD
S. LUSHING, an individual; and
DOES 1-100, inclusive,

Defendants.

JAIME DeJESUS GONZALEZ, as
Trustee of THE MANSDORF FAMILY
TRUST

Intervenor.

CASE NO.: 56-2013-00444799-CU-OR-VTA

NOTICE OF DEPOSITION AND NOTICE TO
PRODUCE DOCUMENTS

(CCP §§2025.220(a)(4); 2025.230)

DATE: August 13, 2014

TIME: 9:30 AM

PLACE: 700 South Flower Street
Suite 1222
Los Angeles, CA 90017

1 TO ALL PARTIES AND THEIR COUNSEL:

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3 PLEASE TAKE NOTICE that attorneys for Intervenor JAIME DeJESUS
4 GONZALEZ, the Trustee of THE MANSDORF FAMILY TRUST; shall take the
5 oral deposition of HOWARD WEINBERG, the founder, officer, member,
6 manager and/or employee of COUNTY LINE HOLDINGS, LLC ("COUNTY LINE")
7 believed to be the person at COUNTY LINE who is most qualified to
8 testify about the preparation and recording of the Sheriff's Deed
9 recorded in Ventura County, CA on April 18, 2013 as Instrument No.
10 20130418-00071134-0, including the preparation of legal descriptions
11 attached thereto, and the person most qualified to testify about the
12 execution sale that occurred on such date and the communication and
13 coordination with JOHN C. TORJENSEN or anyone representing JOHN C.
14 TORJENSEN regarding such sale.

15 Such deposition shall occur at the law offices of Gifford,
16 Dearing & Abernathy, LLP located at 700 South Flower Street,
17 Suite 1222, Los Angeles, California 90017 on August 13, 2014 at
18 9:30 A.M.

19 The deposition shall continue from said date and time, if
20 necessary, Sundays and holidays excepted.

21
22 **NOTICE TO PRODUCE MATERIALS**

23 At said deposition, such deponent shall produce the following
24 WRITINGS (as defined below), whether first existing in writing or as
25 electronically-stored information, now in the custody or control of
26 either WEINBERG or COUNTY LINE.
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1 The term "REAL PROPERTY" refers to the approximate 1300
2 contiguous acres of coastal real property in Ventura County that is
3 the subject of this litigation.

4
5 1. All WRITINGS used or relied upon for investigation of
6 either the state of title or the value of the REAL
7 PROPERTY, before April 18, 2013.

8
9 2. All WRITINGS regarding the subject Sheriff's Deed,
10 including all WRITINGS containing or referring to
11 instructions for its recording.

12
13 3. All WRITINGS related to the preparation of the legal
14 descriptions attached to the subject Sheriff's Deed,
15 including the title report or other WRITING from which such
16 legal description was copied.

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18 4. All WRITINGS that caused COUNTY LINE representatives to
19 believe, on or before April 18, 2013, that attaching legal
20 descriptions to the subject Sheriff's Deed before its
21 recording was appropriate, justified or proper.

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1 5. All WRITINGS informing COUNTY LINE agents or employees or
2 WEINBERG of the successful recording of the subject
3 Sheriff's Deed, including any reports of, from or to COUNTY
4 LINE agents, members, officers or employees or of, from or
5 to anyone at, or associated with, JOHN C. TROJESSEN &
6 ASSOCIATES (including TORJESSEN's attorneys,) regarding
7 completion of such recording.

8
9 6. All WRITINGS that identify the source of, or relate to,
10 "Commitment No. NCS-584544-LA2" as referenced in the upper-
11 right corner of the legal descriptions set forth on the
12 subject Sheriff's Deed.

13
14 7. All WRITINGS (other than pleadings in LASC Case Nos.
15 BP146138 AND BP147495) delivered to or received from JOHN
16 C. TORJESSEN & ASSOCIATES or JOHN C. TORJESSEN or their
17 agents, employees or attorneys (including CHRISTOPHER
18 BARNES) and all WRITINGS that log when and where HOWARD
19 WEINBERG (or other representatives or attorneys for COUNTY
20 LINE) met or conversed with JOHN C. TORJESSEN (or any of
21 TORJESSEN's employees, agents, associates or attorneys
22 including CHRISTOPHER BARNES) on any subject, including all
23 notes and statements resulting from such meetings and
24 conversations, from January 1, 2012 to date.

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- 1 8. All WRITINGS related to payments of money or other
2 transfers of value (other than the \$500,000.00 paid at the
3 execution sale), or promises therefor, to or from anyone
4 associated with JOHN C. TORJESEN or JOHN C. TORJESEN &
5 ASSOCIATES and to or from anyone associated with HOWARD
6 WEINBERG or COUNTY LINE, from January 1, 2012 to date.
7
8 9. All WRITINGS related to COUNTY LINE's preparation for, and
9 the expected profit resulting from, the execution sale that
10 occurred on April 18, 2013, including appraisals,
11 preliminary title reports, photographs, memoranda, business
12 plans and investor circulars.
13
14 10. All title reports, litigation guarantees and other writings
15 used to identify either the defendants in this case or any
16 other person or entities with an interest in the subject
17 property.
18
19 11. All WRITINGS regarding the Notice of the Sheriff's Sale of
20 Real Property dated March 7, 2013, or any such notice dated
21 prior thereto for the REAL PROPERTY, and the preparation
22 thereof, including the source of the purported legal
23 descriptions (the Assessor Parcel Numbers) referenced
24 therein.
25
26 12. All WRITINGS related to conduct of the the execution sale
27 that occurred on April 18, 2013.
28

1 13. All WRITINGS related to HOWARD WEINBERG's discovery that
2 the REAL PROPERTY could become available for purchase by an
3 execution sale at any time and, specifically, all writings
4 related to WEINBERG's discovery that such property would
5 become available for such a purchase on April 18, 2013.

6
7 14. A copy of the subject Sheriff's Deed as delivered to a
8 representative of COUNTY LINE, i.e. before any changes,
9 modifications, alterations or additions to such deed.

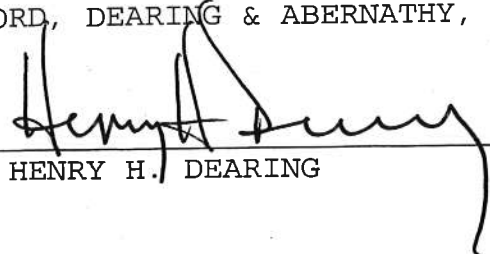
10
11 15. The original Sheriff's Deed as recorded.

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13 The term "WRITINGS" includes photographs and documents that are
14 handwritten, typed, printed, photostatted, photographed or
15 electronically stored. Electronically-stored writings and
16 information, including email and facsimile transmittals, shall be
17 produced in hard-copy printed format on 8½" x 11" white paper.

18
19 And "WRITINGS" includes documents, checks, the instruments,
20 notes, memos, notes of telephone conversations, email messages,
21 letters, transmittals, inquiries, instructions and all other written
22 evidence of payment, transfer, conveyance, communication or
23 representation as defined in Cal. Ev. C. §250.

24
25 Dated: June 19th, 2014

GIFFORD, DEARING & ABERNATHY, LLP

26
27 By: 

HENRY H. DEARING

PROOF OF SERVICE BY MAIL

(1013a, 2015.5 C.C.P.)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES:

I am a resident of the county aforesaid; I am over the age of eighteen years and not a party to the within entitled action; my business address is: **700 S. FLOWER STREET, SUITE 1222, LOS ANGELES, CA 90017.**

On June 20, 2014, I served the within **NOTICE OF DEPOSITION AND NOTICE TO PRODUCE DOCUMENTS (CCP §§2025.220(a)(4); 2025.230)** on the interested parties in said action, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid, in the United States mail at Los Angeles, California addressed as follows:

John Antoni, Esq.
Antoni Albus, LLP
11836 W. Pico Boulevard
Los Angeles, CA 90064

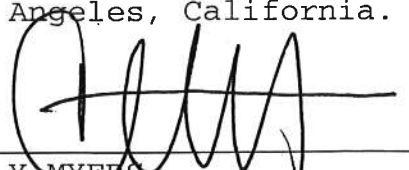
Paul Orloff, Esq.
Orloff and Associates APC
8402 Florence Ave., Suite B1
Downey, CA 90240

Timothy B. Sottile
Sottile & Baltaxe
4333 Park Terrace Dr., #160
Westlake Village, CA 91361

Joel Mark
Hathaway, Perrett, Webster, et al
5450 Telegraph Rd., #200
Ventura, CA 93003

I declare, under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed on June 20, 2014, at Los Angeles, California.


CARLY MYERS