

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Paul Orloff, Esq. 216791 Orloff & Associates APC 8402 Florence Avenue Suite B1 Downey, California 90240 TELEPHONE NO.: (562) 869-3034 FAX NO. (Optional): (562) 869-3539 E-MAIL ADDRESS (Optional): ATTORNEY FOR (Name): Jaime DeJesus Gonzalez	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Stanley Mosk Courthouse	
PLAINTIFF/PETITIONER: Jaime DeJesus Gonzalez DEFENDANT/RESPONDENT: Alta Standard One LLC	CASE NUMBER: BC506777
NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION (Code Civ. Proc., §§ 1985.3, 1985.6)	

NOTICE TO CONSUMER OR EMPLOYEE

TO (name): Marc Bohbot and/or Attorney of Record

- PLEASE TAKE NOTICE THAT **REQUESTING PARTY (name):** Jaime DeJesus Gonzalez
SEEKS YOUR RECORDS FOR EXAMINATION by the parties to this action on (specify date): 11/25/13
The records are described in the subpoena directed to **witness (specify name and address of person or entity from whom records are sought):** Bank of America
A copy of the subpoena is attached.
- IF YOU OBJECT to the production of these records, YOU MUST DO ONE OF THE FOLLOWING BEFORE THE DATE SPECIFIED.
IN ITEM a. OR b. BELOW:
 - If you are a party to the above-entitled action, you must file a motion pursuant to Code of Civil Procedure section 1987.1 to quash or modify the subpoena and give notice of that motion to the **witness** and the **deposition officer** named in the subpoena at least five days before the date set for production of the records.
 - If you are not a party to this action, you must serve on the **requesting party** and on the **witness**, before the date set for production of the records, a written objection that states the specific grounds on which production of such records should be prohibited. You may use the form below to object and state the grounds for your objection. You must complete the Proof of Service on the reverse side indicating whether you personally served or mailed the objection. The objection should **not** be filed with the court. **WARNING: IF YOUR OBJECTION IS NOT RECEIVED BEFORE THE DATE SPECIFIED IN ITEM 1, YOUR RECORDS MAY BE PRODUCED AND MAY BE AVAILABLE TO ALL PARTIES.**
- YOU OR YOUR ATTORNEY MAY CONTACT THE UNDERSIGNED to determine whether an agreement can be reached in writing to cancel or limit the scope of the subpoena. If no such agreement is reached, and if you are not otherwise represented by an attorney in this action, YOU SHOULD CONSULT AN ATTORNEY TO ADVISE YOU OF YOUR RIGHTS OF PRIVACY.

Date: 10/31/13

Paul Orloff

(TYPE OR PRINT NAME)



(SIGNATURE OF



REQUESTING PARTY



ATTORNEY)

OBJECTION BY NON-PARTY TO PRODUCTION OF RECORDS

- ☐ I object to the production of all of my records specified in the subpoena.
- ☐ I object only to the production of the following specified records:

- The specific grounds for my objection are as follows:

Date:

(TYPE OR PRINT NAME)

(Proof of service on reverse)

(SIGNATURE)

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PLAINTIFF/PETITIONER: Jaime DeJesus Gonzalez	CASE NUMBER:
DEFENDANT/RESPONDENT: Alta Standard One LLC	BC506777

PROOF OF SERVICE OF NOTICE TO CONSUMER OR EMPLOYEE AND OBJECTION

(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☐ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. I served a copy of the *Notice to Consumer or Employee and Objection* as follows (check either a or b):
 - a. ☐ **Personal service.** I personally delivered the *Notice to Consumer or Employee and Objection* as follows:
 - (1) Name of person served:
 - (2) Address where served:
 - (3) Date served:
 - (4) Time served:
 - b. ☐ **Mail.** I deposited the *Notice to Consumer or Employee and Objection* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (1) Name of person served:
 - (2) Address:
 - (3) Date of mailing:
 - (4) Place of mailing (city and state):
- (5) I am a resident of or employed in the county where the *Notice to Consumer or Employee and Objection* was mailed.
- c. My residence or business address is (specify):
- d. My phone number is (specify):

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

Date:

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

PROOF OF SERVICE OF OBJECTION TO PRODUCTION OF RECORDS

(Code Civ. Proc., §§ 1985.3, 1985.6)

☐ Personal Service ☐ Mail

1. At the time of service I was at least 18 years of age and not a party to this legal action.
2. I served a copy of the *Objection to Production of Records* as follows (complete either a or b):
 - a. **ON THE REQUESTING PARTY**
 - (1) ☐ **Personal service.** I personally delivered the *Objection to Production of Records* as follows:
 - (i) Name of person served:
 - (ii) Address where served:
 - (iii) Date served:
 - (iv) Time served:
 - (2) ☐ **Mail.** I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (i) Name of person served:
 - (ii) Address:
 - (iii) Date of mailing:
 - (iv) Place of mailing (city and state):
 - (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
 - b. **ON THE WITNESS**
 - (1) ☐ **Personal service.** I personally delivered the *Objection to Production of Records* as follows:
 - (i) Name of person served:
 - (ii) Address where served:
 - (iii) Date served:
 - (iv) Time served:
 - (2) ☐ **Mail.** I deposited the *Objection to Production of Records* in the United States mail, in a sealed envelope with postage fully prepaid. The envelope was addressed as follows:
 - (i) Name of person served:
 - (ii) Address:
 - (iii) Date of mailing:
 - (iv) Place of mailing (city and state):
 - (v) I am a resident of or employed in the county where the *Objection to Production of Records* was mailed.
3. My residence or business address is (specify):
4. My phone number is (specify):

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

Date:

(TYPE OR PRINT NAME OF PERSON WHO SERVED)

(SIGNATURE OF PERSON WHO SERVED)

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Paul Orloff, Esq. 216791 Orloff & Associates APC 8402 Florence Avenue Suite B1 Downey, California 90240 TELEPHONE NO.: (562) 869-3034 FAX NO.: (562) 869-3539 E-MAIL ADDRESS: ATTORNEY FOR (Name): Jaime DeJesus Gonzalez SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 N. Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, California 90012 BRANCH NAME: Stanley Mosk Courthouse PLAINTIFF/PETITIONER: Jaime DeJesus Gonzalez DEFENDANT/RESPONDENT: Alta Standard One LLC	FOR COURT USE ONLY
DEPOSITION SUBPOENA FOR PRODUCTION OF BUSINESS RECORDS	CASE NUMBER: BC506777

THE PEOPLE OF THE STATE OF CALIFORNIA, TO (name, address, and telephone number of deponent, if known):
 Bank of America c/o CT CORPORATION 818 W SEVENTH ST, Los Angeles,
 California 90017

1. YOU ARE ORDERED TO PRODUCE THE BUSINESS RECORDS described in item 3, as follows:

To (name of deposition officer): CLASSIC LEGAL SERVICES	
On (date): 11/25/2013	At (time): 10:00 am
Location (address): 205 S. Broadway, Suite 825, Los Angeles, California 90012	
Do not release the requested records to the deposition officer prior to the date and time stated above.	

- ☐ by delivering a true, legible, and durable copy of the business records described in item 3, enclosed in a sealed inner wrapper with the title and number of the action, name of witness, and date of subpoena clearly written on it. The inner wrapper shall then be enclosed in an outer envelope or wrapper, sealed, and mailed to the deposition officer at the address in item 1.
 - ☐ by delivering a true, legible, and durable copy of the business records described in item 3 to the deposition officer at the witness's address, on receipt of payment in cash or by check of the reasonable costs of preparing the copy, as determined under Evidence Code section 1563(b).
 - ☒ by making the original business records described in item 3 available for inspection at your business address by the attorney's representative and permitting copying at your business address under reasonable conditions during normal business hours.
2. The records are to be produced by the date and time shown in item 1 (but not sooner than 20 days after the issuance of the deposition subpoena, or 15 days after service, whichever date is later). Reasonable costs of locating records, making them available or copying them, and postage, if any, are recoverable as set forth in Evidence Code section 1563(b). The records shall be accompanied by an affidavit of the custodian or other qualified witness pursuant to Evidence Code section 1561.
3. The records to be produced are described as follows (if electronically stored information is demanded, the form or forms in which each type of information is to be produced may be specified):
 SEE ATTACHMENT

☒ Continued on Attachment 3.

4. IF YOU HAVE BEEN SERVED WITH THIS SUBPOENA AS A CUSTODIAN OF CONSUMER OR EMPLOYEE RECORDS UNDER CODE OF CIVIL PROCEDURE SECTION 1985.3 OR 1985.6 AND A MOTION TO QUASH OR AN OBJECTION HAS BEEN SERVED ON YOU, A COURT ORDER OR AGREEMENT OF THE PARTIES, WITNESSES, AND CONSUMER OR EMPLOYEE AFFECTED MUST BE OBTAINED BEFORE YOU ARE REQUIRED TO PRODUCE CONSUMER OR EMPLOYEE RECORDS.

DISOBEDIENCE OF THIS SUBPOENA MAY BE PUNISHED AS CONTEMPT BY THIS COURT. YOU WILL ALSO BE LIABLE FOR THE SUM OF FIVE HUNDRED DOLLARS AND ALL DAMAGES RESULTING FROM YOUR FAILURE TO OBEY.

Date issued: 10/31/2013

PAUL ORLOFF

(TYPE OR PRINT NAME)


 (SIGNATURE OF PERSON ISSUING SUBPOENA)
 ATTORNEY FOR GONZALEZ

(Proof of service on reverse)

(TITLE)

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PLAINTIFF/PETITIONER: Jaime DeJesus Gonzalez	CASE NUMBER: BC506777
DEFENDANT/RESPONDENT: Alta Standard One LLC	

**PROOF OF SERVICE OF DEPOSITION SUBPOENA FOR
PRODUCTION OF BUSINESS RECORDS**

1. I served this *Deposition Subpoena for Production of Business Records* by personally delivering a copy to the person served as follows:

a. Person served (*name*):

b. Address where served:

c. Date of delivery:

d. Time of delivery:

e. (1) ☐ Witness fees were paid.

Amount:..... \$ _____

(2) ☐ Copying fees were paid.

Amount:..... \$ _____

f. Fee for service:..... \$ _____

2. I received this subpoena for service on (*date*):

3. Person serving:

a. ☐ Not a registered California process server.

b. ☐ California sheriff or marshal.

c. ☐ Registered California process server.

d. ☐ Employee or independent contractor of a registered California process server.

e. ☐ Exempt from registration under Business and Professions Code section 22350(b).

f. ☐ Registered professional photocopier.

g. ☐ Exempt from registration under Business and Professions Code section 22451.

h. Name, address, telephone number, and, if applicable, county of registration and number:

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

Date:

▶ _____

(SIGNATURE)

(For California sheriff or marshal use only)
I certify that the foregoing is true and correct.

Date:

▶ _____

(SIGNATURE)

ATTACHMENT 3

1. Copies of any and all records for the period of time between October 29, 2012 and December 7, 2013, referencing the name, "MARC BOHBOT";
2. Copies of any and all records for the period of time between October 29, 2012 and December 7, 2013, referencing the name, "Marc Bohbot";
3. Copies of any and all records for the period of time between October 29, 2012 and December 7, 2013, referencing the name, "Alta Standard One, LLC";
4. Copies of any and all records for the period of time between October 29, 2012 and December 7, 2013, referencing Cashier's Check No. 0309009284 in the amount of \$50,000;
5. Copies of any and all records for the period of time between October 29, 2012 and December 7, 2013, referencing Cashier's Check No. 0309009285 in the amount of \$50,000;
6. Copies of any and all records for the period of time between October 29, 2012 and December 7, 2013, referencing Cashier's Check No. 0309009286 in the amount of \$50,000;
7. Copies of any and all records for the period of time between October 29, 2012 and December 7, 2013, referencing Cashier's Check No. 0309009287 in the amount of \$300,000;
8. Copies of any and all records for the period of time between October 29, 2012 and December 7, 2013, referencing Cashier's Check No. 0309009288 in the amount of \$150,000;
9. Copies of any and all records for the period of time between October 29, 2012 and December 7, 2013, referencing Cashier's Check No. 0309009289 in the amount of \$100,000;
10. Copies of any and all records for the period of time between October 29, 2012 and December 7, 2013, referencing Cashier's Check No. 0309009290 in the amount of \$100,000;
11. Copies of any and all records for the period of time between October 29, 2012 and December 7, 2013, referencing Cashier's Check No. 0309009307 in the amount of \$1,495,000
12. Copies of any and all records for the period of time between October 29, 2012 and December 7, 2013, referencing Cashier's Check No. 0113016284 in the amount of \$2,295,000