

ROA 120
2 pgs

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
02/27/2018 at 04:40:00 PM
Clerk of the Superior Court
By Ines Quirarte, Deputy Clerk

1 FERRIS & BRITTON
A Professional Corporation
2 Michael R. Weinstein (SBN 106464)
Scott H. Toothacre (SBN 146530)
3 501 West Broadway, Suite 1450
San Diego, California 92101
4 Telephone: (619) 233-3131
Fax: (619) 232-9316
5 mweinstein@ferrisbritton.com
stoothacre@ferrisbritton.com
6

7 Attorneys for Plaintiff/Cross-Defendant
LARRY GERACI

8 **SUPERIOR COURT OF CALIFORNIA**
9 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**

10 LARRY GERACI, an individual,
11 Plaintiff,

12 v.

13 DARRYL COTTON, an individual; and
14 DOES 1 through 10, inclusive,
15 Defendants.

16 DARRYL COTTON, an individual,
17 Cross-Complainant,

18 v.

19 LARRY GERACI, an individual, REBECCA
20 BERRY, an individual, and DOES 1
THROUGH 10, INCLUSIVE,
21 Cross-Defendants.

Case No. 37-2017-00010073-CU-BC-CTL

Judge: Hon. Joel R. Wohlfeil
Dept.: C-73

**NOTICE OF LODGMENT IN SUPPORT
OF MOTION BY PLAINTIFF/CROSS-
DEFENDANT LARRY GERACI FOR A
PRELIMINARY INJUNCTION OR
OTHER ORDER TO COMPEL ACCESS
TO THE SUBJECT PROPERTY FOR
SOILS TESTING**

[IMAGED FILE]

Hearing Date: March 23, 2018
Hearing Time: 9:00 a.m.

Filed: March 21, 2017
Trial Date: May 11, 2018

1 Plaintiff/Cross-Defendant, LARRY GERACI ("Geraci"), hereby lodges the following
 2 documents as exhibits to this Notice of Lodgment ("NOL") in support of his Motion for Preliminary
 3 Injunction or Other Order to Compel Access to the Subject Property for Soils Testing:

Ex. No.	Exhibit Description	Evidentiary Foundation
1.	Ownership Disclosure Statement (Form DS-318), dated October 31,2016	Declaration of Larry Geraci, ¶ 6
2.	Written real estate purchase and sale agreement between Larry Geraci and Darryl Cotton dated November 2, 2016 (the "Nov 2nd Written Agreement")	Declaration of Larry Geraci, ¶ 5
3.	Email to Darryl Cotton from Firouzeh Tirandazi re Federal Boulevard MMCC, dated March 21, 2017 at 8:54 a.m.	Declaration of Larry Geraci, ¶ 10
4.	Email to Larry Geraci from Darryl Cotton re Contract Review, dated March 21, 2017 at 3:18 p.m.	Declaration of Larry Geraci, ¶ 11
5.	Email to Firouzeh Tirandazi from Darryl Cotton re PTS 520606 - Federal Blvd MMCC, dated March 21, 2017 at 3:25 p.m.	Declaration of Larry Geraci, ¶ 12
6.	Email to Darryl Cotton from Michael R. Weinstein re CUP Application - Soils Testing, dated January 18, 2018	Declaration of Michael R. Weinstein, ¶ 5
7.	Email to Darryl Cotton from Michael R. Weinstein re CUP Application - Soils Testing, dated February 6, 2018	Declaration of Michael R. Weinstein, ¶ 7
8.	Email to Darryl Cotton from Michael R. Weinstein re CUP Application - Soils Testing, dated February 26, 2018	Declaration of Michael R. Weinstein, ¶ 8

24 Dated: February 27, 2018

FERRIS & BRITTON
 A Professional Corporation

25
 26 By: Michael R. Weinstein
 27 Michael R. Weinstein
 Scott H. Toothacre
 Attorneys for Plaintiff/Cross-Defendant
 LARRY GERACI