

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
04/15/2019 at 08:25:00 AM
Clerk of the Superior Court
By E- Filing, Deputy Clerk

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Cross-Defendant REBECCA BERRY

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 AND RELATED CROSS-ACTION

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

Judge: Hon. Joel R. Wohlfeil

**DECLARATION OF SCOTT H.
TOOTHACRE IN SUPPORT OF
PLAINTIFF/CROSS-DEFENDANT
LARRY GERACI'S OPPOSITION TO
DEFENDANT/CROSS-COMPLAINANT
DARRYL COTTON'S MOTION FOR
ORDER THAT INITIAL ANSWERS TO
INTERROGATORIES BE DEEMED
BINDING AND FOR SANCTIONS**

[IMAGED FILE]

DATE: April 26, 2019
TIME: 9:00 a.m.
DEPT: C-73

Filed: March 21, 2017
Trial Date: June 28, 2019

23 I, SCOTT H. TOOTHACRE, declare and say as follows:

24 1. I am an attorney with the law firm of Ferris & Britton, APC, attorneys of record herein
25 for Plaintiff/Cross-Defendant Larry Geraci, and for Cross-Defendant Rebecca Berry. I am licensed to
26 practice before all Courts in the State of California. I make this declaration upon personal knowledge
27 except as to those matters stated upon information and belief, and if called as a witness I would and
28 could competently testify under oath as follows:

