

ROA 509  
2 pages

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego  
**04/29/2019** at 01:36:00 PM  
Clerk of the Superior Court  
By E- Filing, 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  
5 Fax: (619) 232-9316  
mweinstein@ferrisbritton.com  
6 stoothacre@ferrisbritton.com

7 Attorneys for Plaintiff/Cross-Defendant LARRY GERACI and  
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.

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

Judge: Hon. Joel R. Wohlfeil

**PLAINTIFF/CROSS-DEFENDANT  
LARRY GERACI'S EVIDENTIARY  
OBJECTIONS IN OPPOSITION TO  
DEFENDANT/CROSS-COMPLAINANT  
DARRYL COTTON'S MOTION FOR  
PARTIAL ADJUDICATION**

16 AND RELATED CROSS-ACTION

[IMAGED FILE]

**DATE: May 10, 2019**  
**TIME: 9:00 a.m.**  
**DEPT: C-73**

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

23 Plaintiff/Cross-Defendant Larry Geraci submits these evidentiary objections to the evidence  
24 submitted by Defendant/Cross-Complainant Darryl Cotton in support of his Motion for Partial  
25 Adjudication.

26 ///

27 ///

28 ///

PLAINTIFF/CROSS-DEFENDANT'S EVIDENTIARY OBJECTIONS

MATERIAL OBJECTED TO	GROUNDS FOR OBJECTIONS	RULING ON THE OBJECTION
<p>Declaration of Andrew Flores in Support of Cross-Complainant Darryl Cotton's Motion for Partial Adjudication</p>		
<p>Paragraph 4 – Declaration of Andrew Flores – “I have personally reviewed all the documents, pleadings, and orders in case, <u>Geraci v. Cotton</u>, case no. 37-2-017-00010073-CU-BC-CTL. Including all the relevant cross-complaint information.</p>	<p>Lacks Relevance (Evid. Code, §§ 210, 350, and 351.)</p>	<p>Sustained: _____            Overruled: _____            _____            Judge            Dated: _____</p>
<p>Paragraph 5 - Declaration of Andrew Flores – “In my review of all the documents, pleadings, and orders in that case, the court has not directly addressed the subject of contract integration throughout the course of the litigation.”</p>	<p>Lacks Relevance (Evid. Code, §§ 210, 350, and 351.)</p>	<p>Sustained: _____            Overruled: _____            _____            Judge            Dated: _____</p>

Dated: April 29, 2019

FERRIS & BRITTON,  
 A Professional Corporation

By: Michael R. Weinstein  
 Michael R. Weinstein  
 Scott H. Toothacre  
 Attorneys for Plaintiff/Cross-Defendant  
 LARRY GERACI and Cross-Defendant  
 REBECCA BERRY