

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego

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Clerk of the Superior Court  
By Adriana Ive Anzalone, Deputy Clerk

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Cross-Defendant REBECCA BERRY

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

11 LARRY GERACI, an individual,  
12 Plaintiff,

13 v.

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

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

19 v.

20 LARRY GERACI, an individual,  
21 REBECCA BERRY, an individual, and  
DOES 1 THROUGH 10, INCLUSIVE,  
22 Cross-Defendants.  
23

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

Judge: Hon. Joel R. Wohlfeil

**PLAINTIFF/CROSS-DEFENDANTS' NOTICE  
OF LODGMENT OF EVIDENCE IN  
OPPOSITION TO DEFENDANT/CROSS-  
COMPLAINANT'S MOTION FOR  
SUMMARY JUDGMENT OR,  
ALTERNATIVELY, SUMMARY  
ADJUDICATION**

**[IMAGED FILE]**

**DATE: May 23, 2019**

**TIME: 9:00 a.m.**

**DEPT: C-73**

Filed: March 21, 2017

Trial Date: June 28, 2019


25 Plaintiff and Cross-Defendant, LARRY GERACI, and Cross-Defendant, REBECCA  
26 BERRY, hereby lodge true and correct copies of the following evidence in support of their opposition  
27 to the Defendants' motion for summary judgment or, alternatively, summary adjudication of issues:  
28 ///

<u>No.</u>	<u>Exhibit Description</u>	<u>Evidentiary Foundation</u>
1.	November 2, 2016 Written Agreement for the purchase of property located at 6176 Federal Blvd., CA ("the Nov 2 <sup>nd</sup> Written Agreement")	Declaration of Larry Geraci ¶ 5
2.	Ownership Disclosure Statement, signed October 31, 2016	Declaration of Larry Geraci ¶ 12
3.	Email from Darryl Cotton to Larry Geraci, dated November 2, 2016 and Larry Geraci's response to Darryl Cotton.	Declaration of Larry Geraci ¶ 13
4.	Geraci's AT&T Call Detail	Declaration of Larry Geraci ¶ 14
5.	Email to Darryl Cotton from Firouzeh Tirandazi, dated March 21, 2017 @ 8:54 a.m.	Declaration of Larry Geraci ¶ 18
6.	Email to Larry Geraci from Darryl Cotton, dated March 21, 2017 @ 3:18 p.m.	Declaration of Larry Geraci ¶ 19
7.	Email to Firouzeh Tirandazi from Larry Geraci, dated March 21, 2017 @ 3:25 p.m.	Declaration of Larry Geraci ¶ 20

Respectfully submitted,

Dated: May 8, 2019

FERRIS & BRITTON,  
A Professional Corporation

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