



1 the Petition for Writ of Mandate, is lodged as **Exhibit 1**.

2 6. A true and correct copy of all the email communication between myself and Larry Geraci  
3 is lodged as **Exhibit 2**, and if called to testify would I authenticate each as such.

4 7. A true and correct copy of all text communication between myself and Larry Geraci is  
5 lodged as **Exhibit 3** and if called to testify I would authenticate each as such.

6 8. A true and correct copy of Plaintiff Larry Geraci's Complaint filed March 21, 2017 is  
7 lodged as **Exhibit 4**.

8 9. A true and correct copy of Cotton's Verified Petition for Alternative Writ of Mandate is  
9 lodged as **Exhibit 5**.

10 10. A true and correct copy of my Cross-Complaint is lodged as **Exhibit 6** and if called to  
11 testify would authenticate it as such.

12 11. A true and correct copy of Plaintiff Larry Geraci's Answer to Cotton's Cross-Complaint  
13 is lodged as **Exhibit 7**.

14 12. A true and correct copy of Plaintiff Larry Geraci's Responses to Form Interrogatories,  
15 Set One is lodged as **Exhibit 8**.

16 13. A true and correct copy of Email from Michael Weinstein is lodged as **Exhibit 9**.

17 14. A true and correct copy of Demurrer by Cross-Defendant Larry Geraci to Second  
18 Amended Cross-Complaint by Darryl Cotton is lodged as **Exhibit 10**.

19 15. A true and correct copy of my Opposition to Larry Geraci's Demurrer to the Second  
20 Amended Cross-Complaint is lodged as **Exhibit 11**.

21 16. A true and correct copy of Reply Memorandum of Points and Authorities in Support of  
22 Cross-Defendant Larry Geraci's Demurrer to Second Amended Cross-Complaint By Darryl Cotton is  
23 lodged as **Exhibit 12**.

24 17. A true and correct copy of Declaration of Larry Geraci in Support of Motion by  
25 Plaintiff/Cross-Defendant Larry Geraci for a Preliminary Injunction or Other Order to Compel Access  
26 to the Subject Property For Soil Testing is lodged as **Exhibit 13**.

27 18. A true and correct copy of Declaration of Larry Geraci in Opposition to Defendant Darryl  
28 Cotton's Motion to Expunge Lis Pendens is lodged as **Exhibit 14**.

1           19.     A true and correct copy of Plaintiff Larry Geraci's Response to Request for Admissions,  
2 Set One is lodged as **Exhibit 15**.

3           20.     During the course of this litigation, I was contacted by Bianca Martinez, a former  
4 employee of Jim Bartell. Ms. Martinez indicated that she was also owed a 10% equity position on my  
5 property because she had discovered it and brought it to the attention of Mr. Bartell and Mr. Geraci, and  
6 that she was owed that as a finder's fee regardless of who won in this litigation.

7           21.     I have reviewed the Plaintiffs additional statement of material facts and supporting  
8 evidence and dispute paragraphs 11-14, 17-43.

9           22.     I understood, when I agreed to allow Rebecca Berry to act as the agent for the CUP  
10 application on my property that she would be an agent of the joint venture between myself and Larry  
11 Geraci .

12           I declare under penalty of perjury according to the laws of the State of California that the  
13 foregoing is true and correct, and that this declaration was executed on May 17, 2019 at San Diego,  
14 California.

  
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DARRYL COTTON

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