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*Attorneys for Defendant CALVIN BROADUS
a/k/a "SNOOP DOGG"*

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JANE DOE, an Individual Woman,

Plaintiff,

v.

CALVIN BROADUS AKA "SNOOP
DOGG", individually; DONALD
CAMPBELL AKA "BISHOP DON
MAGIC JUAN", individually; SNOOP
DOGG'S, LLC; THE BROADUS
COLLECTION, LLC; CASA VERDE
CAPITAL, LLC; and MERRY JANE
EVENTS, INC.,

Defendants.

Case No. 2:22-cv-00900-GW-AS

**DEFENDANT CALVIN
BROADUS'S NOTICE OF
PLAINTIFF'S NON-OPPOSITION
TO HIS MOTION TO DISMISS HER
FIRST AMENDED COMPLAINT**

[Fed. R. Civ. P. 12(b)(6)]

The Hon. George H. Wu

Hearing Date: April 21, 2022

Time: 8:30 a.m.

1 **PLEASE TAKE NOTICE** that under Local Rule 7-9, last Thursday, March
 2 31, 2022, was Plaintiff Jane Doe’s deadline to file an opposition to the Rule 12(b)(6)
 3 Motion to Dismiss filed by Defendant Calvin Broadus—known as “Snoop Dogg”—
 4 on March 24, 2022. March 31, 2022, was also Plaintiff’s deadline to file an opposition
 5 to the Rule 12(b)(6) motions to dismiss filed on March 24, 2022, by the other
 6 defendants in this action. Mr. Broadus’s Motion and the other defendants’ motions
 7 are each scheduled to be heard on April 21, 2022, at 8:30 a.m.

8 Plaintiff filed no opposition to Mr. Broadus’s Motion to Dismiss. Nor did
 9 Plaintiff file an opposition to the other defendants’ motions to dismiss. This is *the*
 10 *second time* Plaintiff forced defendants to file their motions to dismiss—after meeting
 11 and conferring—then failed to file any timely opposition.¹

12 Plaintiff has not refuted Mr. Broadus’s arguments that her First Amended
 13 Complaint fails to state a claim under Federal Rule of Civil Procedure Rule 12(b)(6).
 14 Plaintiff’s counsel never contacted defendants’ counsel to seek an extension of time
 15 or rescheduling of the April 21, 2022, hearing date; he has been silent since the filing
 16 of defendants’ second round of motions to dismiss.

17 Plaintiff has failed to oppose the dismissal of the First Amended Complaint’s
 18 implausible claim under the federal Trafficking Victims Protection Act and the
 19 patently false, and time-barred, claims under California law. Under Local Rule 7-12,
 20 “[t]he failure to file any required document, or the failure to file it within the deadline,
 21 may be deemed consent to the granting . . . of the motion[.]”

22 Given Plaintiff’s failure to file a timely opposition, Mr. Broadus respectfully
 23 requests the Court deem Plaintiff to have consented to granting his Motion and dismiss
 24 with prejudice each of Plaintiff’s claims in her First Amended Complaint.

25
 26
 27 ¹ During and after each meet and confer session, leading up to Defendants’ filing
 28 of their now two rounds of motions to dismiss, Plaintiff’s counsel said nothing about
 withdrawing or amending Plaintiff’s operative complaint, forcing defense counsel in
 each instance to incur the time and expense of preparing and filing Rule 12(b)(6)
 motions that Plaintiff then failed to oppose by this Court’s deadlines.

1 Respectfully submitted,
2 Dated: April 6, 2022 KELLER/ANDERLE LLP

3
4 By: /s/ Jennifer L. Keller

5 Jennifer L. Keller

6 Jennifer L. Keller

7 Jeremy W. Stamelman

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17 *Attorneys for Defendant CALVIN BROADUS*
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE

I am over the age of 18 and not a party to the within action. My business address is 18300 Von Karman Avenue, Suite 930, Irvine, California 92612. On April 6, 2022, I served the foregoing document described as

DEFENDANT CALVIN BROADUS'S NOTICE OF PLAINTIFF'S NON-OPPOSITION TO HIS MOTION TO DISMISS HER FIRST AMENDED COMPLAINT

on the following-listed attorneys who are not on the list to receive e-mail notices for this case (who therefore require manual notice) by the following means of service:

SERVED BY U.S. MAIL: There are currently no individuals on the list to receive mail notices for this case.

SERVED BY CM/ECF: I certify that, on April 6, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system. The filing of the foregoing document will send copies to the following CM/ECF participants:

The following are those who are currently on the list to receive e-mail notices for this case.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Executed on April 6, 2022 at Irvine, California.

/s/ Jennifer L. Keller

Jennifer L. Keller