

KELLER/ANDERLE LLP

Jennifer L. Keller (SBN 84412)
Jeremy W. Stamelman (SBN 216097)
Shaun A. Hoting (SBN 255158)
18300 Von Karman Ave., Suite 930
Irvine, California 92612
Tel.: (949) 476-8700
Fax: (949) 476-0900
jkeller@kelleranderle.com
jstamelman@kelleranderle.com
shoting@kelleranderle.com

*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 RESPONSE TO
PLAINTIFF'S OPPOSITION TO
DEFENDANT'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 Plaintiff's "Opposition" to Defendant Calvin Broadus's Notice of Non-
 2 Opposition attacks this Court's Local Rules as conflicting with the Federal Rules of
 3 Civil Procedure. Defendant reluctantly files this response to correct a glaring issue –
 4 Plaintiff's attack is based entirely on the *wrong set of rules*. Plaintiff claims that the
 5 committee notes to the Federal Rule of Civil Procedure 27(a) mandate courts give
 6 parties at least 14 days to respond to motions. The Federal Rules of Civil Procedure
 7 say no such thing, and Rule 27 of those rules has nothing to do with motions; it
 8 concerns depositions. *See* Fed. R. Civ. P. 27. Plaintiff is, in fact, quoting from the
 9 committee notes to the Federal Rules of *Appellate* Procedure, which have no
 10 applicability here. *See* Fed. R. App. P. 27(a)(2), 2002 Committee Notes.

11 The Federal Rules of *Civil* Procedure—*i.e.*, the ones applicable here—accord
 12 with the applicable Local Rules. Specifically, Federal Rule of Civil Procedure 6(c)(1)
 13 requires only that a "written motion and notice of the hearing must be served at least
 14 14 days before the time specified for the hearing[.]" Defendant filed and served his
 15 Motion on March 24, setting the matter for hearing on April 21, 2022. Defendant's
 16 Motion complied with the FRCP. The applicable Local Rules required Plaintiff's
 17 response by March 31. *See* L.R. 7-9. Plaintiff failed to respond and, rather than seek
 18 an extension through the appropriate means, attacks the Court's Local Rules and
 19 defense counsel for referencing and relying on them as the basis for an unwarranted
 20 extension. Plaintiff's counsel then engages in sanctionable conduct by frivolously
 21 claiming defendants "unfairly weaponize a local rule which they know conflicts with
 22 federal rules." This representation is obviously false and, along with Plaintiff's other
 23 assertions, concedes Plaintiff's counsel knew about this Court's Local Rule and the
 24 applicable deadline, yet was determined to violate it. The Court should not
 25 countenance such behavior, particularly when it is based on intentionally
 26 misrepresenting to the Court the applicable rules and their content.¹

27 ¹ Though beyond the scope of this response, Defendant notes that Plaintiff's
 28 "Opposition" is emblematic of Plaintiff's practice and pleading to date. For example,
 Plaintiff sued entities for sexual assault, without explaining how an entity could

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

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4 By: /s/ Jennifer L. Keller

5 Jennifer L. Keller

6 Jennifer L. Keller

7 Jeremy W. Stamelman

8 Shaun A. Hoting

9 18300 Von Karman Ave., Suite 930

10 Irvine, California 92612

11 Tel.: (949) 476-8700

12 Fax: (949) 476-0900

13 jkeller@kelleranderle.com

14 jstamelman@kelleranderle.com

15 shoting@kelleranderle.com

16
17 *Attorneys for Defendant CALVIN BROADUS*
18 *a/k/a "SNOOP DOGG"*
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assault her, or do so when those entities did not even exist at the time of the alleged assault.

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 RESPONSE TO PLAINTIFF'S
OPPOSITION TO DEFENDANT'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.

Jennifer L Keller jkeller@kelleranderle.com,
cmckinney@kelleranderle.com, lcano@kelleranderle.com

Jeremy w. Stamelman jstamelman@kelleranderle.com,

Jesse Asher Gessin Jesse@Gessin.Ltd, admin@gessin.ltd

Matt Evan Orellana Finkelberg matt@dereksmithlaw.com

Steffeny Holtz steffeny@sholtzlaw.com, esqcolombo@aol.com

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