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Attorneys for the Defendant
CHRISTOPHER WILLIAMS and PICK AXE HOLDING LLC

SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN DIEGO, HALL OF JUSTICE

RICARDO VIDAL d.b.a. SCHNELLZUG
CAPITOL;

Plaintiff,

vs.

PICK AXE HOLDINGS, LLC, a California
limited liability company, CHRISTOPHER
WILLIAMS, an individual; and DOES 1 through
50 inclusive,

Defendant.

CT No. 37-2018-0044217-CU-BC-CTL

**DECLARATION OF ANDREW FLORES RE:
REJECTION OF PROPOSED ORDER.**

I ANDREW FLORES, declare:

1. I am over the age of 18 years old and attorney for Defendants in the above referenced matter.
2. The facts set forth herein are true and correct as of my own personal knowledge.
3. On or about November 5, 2021, after conferring with co-counsel, I filed, via OneLegal eFiling service two documents: Proposed Judgement after Trial, and Request for Statement of Decision.
4. When filing electronically via OneLegal service one can elect to serve the parties electronically. At the time I elected to serve the Plaintiff electronically, via his designated representative from the Law Office of Michael Cindrich. The representative was Anthony Bettencourt email address Anthony@michaelcindrich.com
5. Notification of the filing was sent on November 5, 2021 at 3:41 p.m.
6. Unbeknown to me, the court rejected the filing for lack of proof of service.

- 1 7. I must have missed the notification of the rejection.
- 2 8. I practice mainly criminal defense and do not use the electronic filing system too frequently.
- 3 9. I was notified via email by co-counsel of Tiffany and Bosco, Brandon Mika of the discrepancy
- 4 on February 23, 2022. I immediately filed refiled with the proof of service.
- 5 10. Any mistake or error in submitting the proof of service is was my responsibly and I take full
- 6 responsibility for not having do so much earlier.
- 7 11. My sincerest apologies to Court and Counsel.
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9 I declare under the penalty of perjury under the laws of the State of California that the foregoing is true

10 an correct.

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12 Dated: February 23, 2022

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Andrew Flores, Esq.