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9 Attorney for Defendant  
10 STEPHEN LAKE

11 **SUPERIOR COURT OF CALIFORNIA**  
12 **COUNTY OF SAN DIEGO, HALL OF JUSTICE**

13 AMY SHERLOCK, an individual and on  
14 behalf of her minor children, T.S. and S.S.,  
15 ANDREW FLORES, an individual;

16 Plaintiffs,

17 vs.

18 GINA M. AUSTIN, an individual; AUSTIN  
19 LEGALGROUP, a professional corporation,  
20 LARRY GERACI, an individual, REBECCA  
21 BERRY, an individual; JESSICA  
22 MCELFRESH, an individual; SALAM  
23 RAZUKI, an individual; NINUS MALAN, an  
24 individual; FINCH, THORTON, AND  
25 BARID, a limited liability partnership;  
26 ABHAY SCHWEITZER, an individual and  
27 dba TECHNE; JAMES (AKA JIM)  
28 BARTELL, an individual; NATALIE  
TRANG-MY NGUYEN, an individual,  
AARON MAGAGNA, an individual;  
BRADFORD HARCOURT, an individual;  
SHAWN MILLER, an individual; LOGAN  
STELLMACHER, an individual;  
EULENTIAS DUANE ALEXANDER, an  
individual; STEPHEN LAKE, an individual,  
ALLIED SPECTRUM, INC., a California  
corporation, PRODIGIOUS COLLECTIVES,  
LLC, a limited liability company, and DOES 1  
through 50, inclusive,

Defendants.

**ELECTRONICALLY FILED**  
Superior Court of California,  
County of San Diego  
**11/23/2022** at 05:07:00 PM  
Clerk of the Superior Court  
By Regina Chanez, Deputy Clerk

Case No. **37-2021-0050889-CU-AT-CTL**

**NOTICE OF MOTION AND MOTION TO  
COMPEL RESPONSES TO REQUESTS  
FOR PRODUCTION OF DOCUMENTS,  
FORM INTERROGATORIES, AND FOR  
MONETARY SANCTIONS AGAINST  
PLAINTIFF**

**Hearing Date: February 17, 2023**  
**Hearing Time: 9:00 a.m.**

Case Filed: December 3, 2021  
Department: C-75  
Judge: Hon. James Mangione  
Trial Date: N/A

1 **TO THE COURT, ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:**

2 PLEASE TAKE NOTICE that on February 17, 2023, at 9:00 a.m., or as soon thereafter as  
3 this matter may be heard before the Honorable James A. Mangione in Department C-75 of the  
4 County of San Diego Superior Court, Central Division, located at 330 West Broadway, San Diego,  
5 CA 92101, Defendant STEPHEN LAKE (“Defendant” or “LAKE”) will and hereby does move this  
6 Court for an order requiring Plaintiff AMY SHERLOCK, an individual and on behalf of her minor  
7 children T.S. and S.S. (“Plaintiff” or “SHERLOCK”) to respond to LAKE’s Requests for Production  
8 of Documents, Set One (“RFD”) and Form Interrogatories, Set One (“FI”). Further, LAKE will move  
9 this court for an award of monetary sanctions against SHERLOCK and her counsel of record in the  
10 amount of \$2,820.

11 Good cause exists pursuant to *CCP* §§ 2031.300 and 2031.310 to order SHERLOCK to  
12 respond to LAKE’s RFD. Despite providing a lengthy, nearly two-month extension to respond,  
13 SHERLOCK provided no responses by the agreed upon deadline.

14 Further, good cause exists pursuant to *CCP* §§ 2030.290 and 2030.300 to order SHERLOCK  
15 to respond to LAKE’s FI. Despite providing a lengthy, nearly two-month extension to respond,  
16 SHERLOCK provided no responses by the agreed upon deadline.

17 Finally, good cause exists pursuant to *CCP* §§ 2030.290(c), 2030.300(d), 2031.300(c) and  
18 2031.310(d) for the issuance of sanctions against SHERLOCK and her attorney of record in the  
19 amount of \$2,820 since SHERLOCK has abused the discovery process by failing to provide any  
20 responses to LAKE’s discovery requests.

21 This application is based on this Notice, the accompanying Points and Authorities, the  
22 Declaration of Andrew Hall, the record in this case, and any such oral or documentary evidence as  
23 may be presented at the time of hearing on this application.

24 Dated: November 23, 2022

**BLAKE LAW FIRM**

25 By: 

26 STEVEN W. BLAKE, ESQ.  
27 ANDREW E. HALL, ESQ.  
28 Attorneys for Defendant,  
STEPHEN LAKE