

1 James D. Crosby (State Bar No. 110383)  
Attorney at Law  
2 550 West C Street  
San Diego, CA 92101  
3 Telephone: (619) 450-4149  
Email: crosby@crosbyattorney.com

4 Attorney for Defendant Larry Geraci  
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8 **SUPERIOR COURT OF CALIFORNIA**  
9 **COUNTY OF SAN DIEGO**

10 DARRYL COTTON,

11 Plaintiff,

12 v.

13 LAWRENCE (A/K/A LARRY) GERACI, an  
individual,

14 Defendant.  
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Case No. 37-2022-00000023-CU-MC-CTL

**DEFENDANT’S OBJECTIONS TO  
EVIDENCE SUBMITTED BY PLAINTIFF  
IN SUPPORT OF PLAINTIFF’S MOTION  
TO VACATE VOID JUDGMENT**

Date: July 12, 2024

Time: 9:00 a.m.

Dept.: C-75

Judge: Hon. James A. Mangione

Complaint Filed: January 3, 2022

Trial Date: Unassigned

18 Defendant Larry Geraci lodges submits the following objections to the evidence submitted  
19 by Plaintiff in support of Plaintiff’s Motion to Vacate Void Judgment.

- 20 1. **All of Exhibits A through K attached to Plaintiff’s Notice of Ex Parte Application**  
21 **and Ex Parte Application (1) To Vacate Void Judgment and Court Referral to the**  
**Department of Justice**

22 Offered in Support of Notice of Ex-Parte Application and Ex-Parte Application (1) To  
23 Vacate Void Judgment and Court Referral to the Department of Justice.

24 **Grounds:** Relevance, Evidence Code §210. This “new evidence” and the plethora of  
25 pleadings, grand jury complaints, and other exhibits are wholly irrelevant to whether or  
26 not the Cotton I judgment is void. This is so, especially considering that “[n]o extrinsic  
27 evidence [outside the judgment roll] is allowed” in a party’s attempt to prove that a  
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judgment is void. *OC Interior Services LLC v. Nationstar Mortgage, LLC* (2017 4<sup>th</sup> Dist.) 7 Cal.App.5<sup>th</sup> 318, 1327-1328.; Also there is no foundation laid for admission of any of the exhibits.

**Sustained:** \_\_\_\_\_

**Overruled:** \_\_\_\_\_

Date: June 10, 2024



James D. Crosby  
Attorney for Defendant Larry Geraci