Electronically Filed by Superior Court of California, County of Orange, 10/19/2020 06:12:00 PM. 30-2019-01111797-CU-PO-CJC - ROA # 56 - DAVID H. YAMASAKI, Clerk of the Court By Briana Jurado, Deputy Clerk.

	CIV-141	
ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 262007	FOR COURT USE ONLY	
NAME: Sean A. Brady FIRM NAME: Michel & Associates, P.C.		
STREET ADDRESS: 180 East Ocean Blvd., Suite 200		
CITY: Long Beach STATE: CA ZIP CODE: 90802		
TELEPHONE NO.: (562) 216-4444 FAX NO.: (562) 216-4445		
E-MAIL ADDRESS: sbrady@michellawyers.com		
ATTORNEY FOR (Name): MFY Technical Solutions, LLC		
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE		
STREET ADDRESS: 700 West Civic Center Drive		
MAILING ADDRESS: 700 West Civic Center Drive		
CITY AND ZIP CODE: Santa Ana, 92701 BRANCH NAME: Central Justice Center		
PLAINTIFF/PETITIONER: Francisco G. Cardenas DEFENDANT/RESPONDENT: Ghost Gunner, Inc., et al.		
	CASE NUMBER:	
DECLARATION OF DEMURRING OR MOVING PARTY		
IN SUPPORT OF AUTOMATIC EXTENSION	30-2019-01111797-CU-PO-CJC	
1. (Name of party): MFY Technical Solutions, LLC	was served with	
x a complaint an amended complaint a cross-complaint		
an answer other (specify):		
in the above-titled action.		
2. For a demurrer or motion to strike, a responsive pleading is due on (date): October 20,	2020	
DECLARATION		
I intend to file a demurrer, motion to strike, or motion for judgment on the pleadings in this action. Before I can do so, I am required to meet and confer with the party who filed the pleading that I am responding to at least five days before the date when the responsive pleading is due (if I am filing a demurrer or motion to strike) and at least five days before the last day a motion for judgment on the pleadings may be filed (if I am filing a motion for judgment on the pleadings). We have not been able to meet and confer. I have not previously requested an automatic extension of time. Therefore, on timely filing and serving a declaration that meets the requirements of Code of Civil Procedure sections 430.41, 435.5, or 439, I am entitled to an automatic 30-day extension of time within which to file a responsive pleading or motion for judgment on the pleadings.		
I made a good faith attempt to meet and confer with the party who filed the pleading at leading was due (if I am filing a demurrer or motion to strike) and at least five days before pleadings may be filed (if I am filing a motion for judgment on the pleadings). I was unable (the reasons why the parties could not meet and confer are stated):	e the last day a motion for judgment on the	
x below on form MC-031, Attached Declaration		
On October 14, 2020, and again on October 15, 2020, I, Sean A. Brady, counsel for and other defendants named in this matter, sent electronic correspondence to the tw Francisco Cardenas in the caption of the complaint filed in this action, Gerald B. Sing addresses listed in that caption, requesting to meet and confer on behalf of my client filing of a demurrer. I did not receive a response until today, October 19, 2020, from in his email address listed on the complaint that I copied and pasted. I did not see th with the typo did not send back an error message. Mr. Rosenfeld's response to my comeet and confer on the matters raised in my correspondence to him until October 26 deadline to file a responsive pleading.	o attorneys listed as counsel for Plaintiff gleton and Ben Rosenfeld, at the email is concerning, among other matters, their Mr. Rosenfeld. Apparently, there was a typo e typo until today because the email address orrespondence stated that he is unable to	
I declare under penalty of perjury under the laws of the State of California that the inf	ormation above is true and correct.	
Date: October 19, 2020		

(SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

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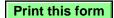
Form Approved for Optional Use Judicial Council of California CIV-141 [Rev. January 1, 2019]

Sean A. Brady

DECLARATION OF DEMURRING OR MOVING PARTY IN SUPPORT OF AUTOMATIC EXTENSION

Code of Civil Procedure, §§ 430.41, 435.5, 439 www.courts.ca.gov

(NAME OF PARTY OR ATTORNEY FOR PARTY)





1	PROOF OF SERVICE
2 3	STATE OF CALIFORNIA COUNTY OF ORANGE
4 5	I, Laura Palmerin, am employed in the City of Long Beach, Los Angeles County, California. I am over the age eighteen (18) years and am not a party to the within action. My business address is 180 East Ocean Boulevard, Suite 200, Long Beach, California 90802.
6	On October 19, 2020, I served the foregoing document(s) described as:
7 8	DECLARATION OF DEMURRING OR MOVING PARTY IN SUPPORT OF AUTOMATIC EXTENSION
9 10 11	on the interested parties in this action by placing [] the original [X] a true and correct copy thereof by the following means, addressed as follows:
12 13 14	Gerald B. Singleton Singleton Law Firm 450 A Street, 5th Floor San Diego, CA 92101 gerald@SLFfirm.com
15 16 17	Ben Rosenfeld 115 ½ Bartlett Street San Francisco, CA 94110 ben.rosenfeld@comcast.net
18 19	Attorneys for Plaintiff
20 21	X (BY ELECTRONIC MAIL) As follows: I served a true and correct copy by electronic transmission through One Legal. Said transmission was reported and completed without error.
22	X (STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
24	Executed on October 19, 2020, at Long Beach, California.
25	Janufaleine
26	Laura Palmerin
27	
28	

PROOF OF SERVICE