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18 Attorneys for Plaintiffs

19 **UNITED STATES DISTRICT COURT**
20 **FOR THE SOUTHERN DISTRICT OF CALIFORNIA**

21 LANA RAE RENNA, et al.,
22 Plaintiffs,

23 vs.

24 ROB BONTA, et al.,
25 Defendants.
26

Case No.: 20-cv-2190-DMS-DEB

DECLARATION IN SUPPORT OF
MOTION TO WITHDRAW AS
COUNSEL FOR PLAINTIFF
RICHARD BAILEY

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DECLARATION OF RAYMOND M. DIGUISEPPE

I, Raymond M. DiGuiseppe, am not a party in the above-titled action. I am over the age of 18, have personal knowledge of the facts and events referred to in this Declaration, and am competent to testify to the matters stated below.

1. Defendant Luis Lopez served Plaintiff Bailey with Defendant Lopez’s First Set of Written Discovery on December 15, 2021. Defendant Lopez served the same set of discovery on the rest of the Plaintiffs.

2. Co-counsel and I drafted responses to Defendant Lopez’s discovery requests on behalf of all the Plaintiffs, including Plaintiff Bailey, and transmitted those draft responses to them for their review and approval. All the Plaintiffs have responded to our communications by participating in the discovery process so that we could properly and timely complete their responses, with the sole exception of Plaintiff Bailey.

3. Co-counsel and I have contacted Plaintiff Bailey numerous times through multiple verified contact methods in an attempt to connect with him and engage him in the discovery process, each time emphasizing the need for his timely participation and cooperation in the case. These contacts were as follows:

- January 18, 2022: Email
- January 20, 2022: Email
- January 21, 2022: Phone call to Plaintiff Bailey’s cell phone, with voice message
- January 21, 2022: Text message to Plaintiff Bailey’s cell phone
- January 24, 2022: Phone call to Plaintiff Bailey’s cell phone with voice message
- January 25, 2022: Phone call to Plaintiff Bailey’s cell phone
- February 2, 2022: Email

