

1 Megan S. Wynne, Esq., SBN 183707
Ashley A. Escudero, Esq., SBN250473
2 **MORRIS POLICH & PURDY LLP**
One America Plaza
3 600 West Broadway, Suite 500
San Diego, California 92101
4 Tel: (619) 557-0404
Fax: (619) 557-0460

5 Donald T. Ridley, Esq.
6 (*pro hac vice application to be filed*)
THE MANDEL LAW FIRM
7 370 Lexington Avenue, Suite 505
New York, NY 10017
8 Tel: (212) 697-7383
Fax: (212) 681-6157

9 Attorneys for Gerrit Lösch

14 JAN 23 PM 4:40

F I L E D
Clerk of the Superior Court

JAN 23 2014

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**

12 JOSE LOPEZ, an Individual,

13 Plaintiff,

14 v.

15 DOE 1, LINDA VISTA CHURCH; DOE
16 2, SUPERVISORY ORGANIZATION;
DOE 3, PERPETRATOR; and DOES 4
17 through 100, inclusive,

18 Defendants.

CASE NO. 37-2012-00099849-CU-PO-CTL

**EX PARTE APPLICATION FOR ADMISSION
OF DONALD T. RIDLEY, ESQ. PRO HAC
VICE; MEMORANDUM OF POINTS AND
AUTHORITIES IN SUPPORT THEREOF;
DECLARATION OF ASHLEY A.
ESCUDERO, APPLICATION OF DONALD T.
RIDLEY, ESQ. FOR ADMISSION TO THE
BAR OF THIS COURT PRO HAC VICE; AND
[PROPOSED] ORDER**

Date: January 28, 2014
Time: 8:30 a.m.
Dept: C-65
Judge: Joan M. Lewis
Trial Date: June 27, 2014

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24 **TO THIS HONORABLE COURT AND TO ALL PARTIES AND TO THEIR**
25 **ATTORNEYS OF RECORD:**

26 GERRIT LÖSCH makes this Special Appearance to bring an *Ex Parte* Application for the
27 admission of Donald T. Ridley of The Mandel Law Firm *pro hac vice* in this matter. This *Ex Parte*

28 SD225540.DOC

1

1 Application will be heard in Department C-65 of the above-entitled court located at 330 West
2 Broadway, San Diego, California 92101, at 8:30 a.m. on January 28, 2014, or as soon thereafter as
3 the matter may be heard.

4 This *Ex Parte* Application is made pursuant to Rule 9.40 of the California Rules of Court on
5 the grounds that Mr. Ridley has specialized knowledge regarding the issues in this lawsuit that pertain
6 to the deposition of Gerrit Lösch, which was ordered by this Court on January 2, 2014 to proceed
7 within the next 90 days, and that Mr. Ridley's specialized knowledge is needed to adequately
8 represent Mr. Lösch in his Motion to Quash the Court's Order regarding his deposition. Furthermore,
9 Mr. Ridley meets all the requirements of admission. *Ex parte* relief is warranted because the Court
10 does not have any hearing dates available to hear Mr. Ridley's *pro hac vice* application as a regularly
11 noticed motion within the next 90 days.

12 This *Ex Parte* Application is based upon this Notice, the attached application signed by Mr.
13 Ridley, the attached memorandum of points and authorities, the Declaration of Ashley A. Escudero,
14 all pleadings, papers and records on file in this action, and upon such other oral and documentary
15 evidence as may be presented at the hearing of the Motion.

16 Dated: January 23, 2014

MORRIS POLICH & PURDY LLP

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19 By: 

Megan S. Wynne, Esq.
Ashley A. Escudero, Esq.
Attorneys for Gerrit Lösch

1 MEMORANDUM OF POINTS AND AUTHORITIES

2 I. INTRODUCTION/SUMMARY OF ARGUMENT

3 Upon information and belief, this case concerns a claim for damages arising out of the
4 alleged abuse of Plaintiff Jose Lopez. Following briefing by the parties and oral argument
5 regarding Plaintiff's Notice of Taking Deposition of Gerrit Lösch, With Production of Documents
6 Required – Video Recorded For Use At Trial ("Notice of Deposition"), the Discovery Referee, the
7 Honorable Vincent P. Di Figlia (Ret.), issued his recommendations including that plaintiff be
8 permitted to depose Mr. Lösch and further, that Mr. Lösch is a managing agent (of Defendant The
9 Watchtower Bible and Tract Society of New York, Inc. ("Watchtower")) within the contemplation
10 of the law. (Declaration of Ashley A. Escudero ("Escudero Decl."), ¶ 2, Exhibit "A", Discovery
11 Referee's Recommendations dated December 20, 2013, p. 3, Section III.A.) This Court affirmed
12 the Discovery Referee's recommendation that plaintiff be permitted to depose Mr. Lösch by a
13 Minute Order dated January 2, 2014 and issued January 10, 2014 ("Minute Order").

14 Mr. Lösch has retained Donald Ridley, Esq., as his attorney of record for all purposes
15 related to this action; however, Mr. Ridley is not admitted in California. Accordingly, Mr. Lösch
16 seeks to have Mr. Ridley admitted *pro hac vice* so that Mr. Ridley may represent Mr. Lösch for all
17 purposes related to this action. Mr. Ridley has been retained as Mr. Lösch's primary counsel and he
18 is uniquely familiar with Mr. Lösch's involvement on the governing body and with the distinction
19 between the governing body and defendant Watchtower, as well as the reasons why Mr. Lösch will
20 be specially appearing to file a Motion to Quash the Court's Minute Order. (Escudero Decl., ¶ 3.)

21 Pursuant to the Court's Minute Order, Mr. Lösch must be produced for deposition within 90
22 days. (See Minute Order.) As Mr. Lösch's retained counsel, Mr. Ridley intends to represent Mr.
23 Lösch in making a Special Appearance in connection with Mr. Lösch's Motion to Quash said
24 deposition that will be filed with the Court shortly; however, Mr. Ridley must first be admitted *pro*
25 *hac vice*. Mr. Lösch's local counsel contacted the Court to obtain a hearing date for a noticed
26 motion for admission *pro hac vice* and was informed that the earliest available date is April 15,
27 2014 – more than 90 days from the date of the Minute Order. (Escudero Decl., ¶ 4.) Therefore, in

1 order for Mr. Lösch's Motion to Quash the Notice of Deposition to be timely heard pursuant to the
2 deadlines set in the Court's Minute Order, Mr. Ridley's application for admission *pro hac vice*
3 should be considered on an *ex parte* basis. If Mr. Ridley's application for admission is not heard *ex*
4 *parte*, Mr. Ridley will not be able to represent Mr. Lösch with respect to his Motion to Quash,
5 which would greatly prejudice Mr. Lösch and deny him his right to counsel with specialized
6 knowledge of the issues related to the Notice of Deposition.

7 **II. AUTHORITY**

8 A person who is not a member of the State Bar of California but who is a member in good
9 standing of and eligible to practice before the bar of any United States court or the highest court in
10 any state, territory, or insular possession of the United States, and who has been retained to appear
11 in a particular cause pending in a court of this state, may in the discretion of such court be permitted
12 upon written application to appear as counsel *pro hac vice*. *California Rules of Court* § 9.40(a).
13 Application for admission *pro hac vice* may be made *ex parte* on the grounds that the Courts have
14 the power to control the pace of litigation pursuant to their case management powers. *California*
15 *Rules of Court* § 3.713(c).

16 **III. THE ATTORNEY'S DECLARATION SATISFIES THE REQUIREMENTS OF**
17 **RULE OF COURT 9.40**

18 Rule 9.40 of California Rules of Court sets forth the procedure to be followed by a person
19 seeking to appear as counsel *pro hac vice* in a California action. The accompanying Application of
20 Donald T. Ridley satisfies each of the requirements set forth in Rule 9.40(d). Because of Mr. Ridley's
21 familiarity with Mr. Lösch and Mr. Lösch's involvement with the governing body, the issues presented
22 in this case and the circumstances from which they arise, and the resulting economies that will be
23 realized if he is permitted to appear as Mr. Lösch's lead counsel, Mr. Lösch respectfully requests that
24 the Court grant this *Ex Parte* Application.

25 **III. NOTICE HAS BEEN SERVED IN COMPLIANCE WITH RULE OF COURT**
26 **9.40(c)(1)**

27 In compliance with Rule 9.40(c)(1), notice of the hearing on this *Ex Parte* Application has been
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1 served on all parties who have appeared in the case; a copy was also served on the State Bar of
2 California at its San Francisco office, along with one check in the required amount of \$50.00 per
3 person for admitting Mr. Ridley *pro hac vice*, and a true, correct, complete copy of this *Ex Parte*
4 application. (Escudero Decl., ¶ 5, Exhibit "B".)

5 **IV. CONCLUSION**

6 Based upon the foregoing, Mr. Lösch respectfully requests that the Court grant this *Ex Parte*
7 Application and issue an order admitting Mr. Ridley *pro hac vice* to represent Mr. Lösch in connection
8 with the Notice of Deposition and any other issues related to this action.

9 Dated: January 23, 2014

MORRIS POLICH & PURDY LLP

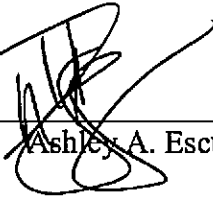
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11 By: 

12 Megan S. Wynne, Esq.
13 Ashley A. Escudero, Esq.
14 Attorneys for Gerrit Lösch
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1 was informed that the earliest available date is April May 23, 2014 – more than 90 days from the
2 date of the Minute Order.

3 5. In compliance with Rule 9.40(c)(1), notice of the hearing on this *Ex Parte*
4 Application was served on all parties who have appeared in the case; a copy was also served on the
5 State Bar of California at its San Francisco office, along with one check in the required amount of
6 \$50.00 per person for admitting Mr. Ridley *pro hac vice*, and a true, correct, complete copy of this
7 *Ex Parte* Application. A true and correct copy of the documents served on the State Bar of
8 California, including the cover letter, copy of the \$50.00 check made payable to the State Bar, and
9 copy of the *Ex Parte* Application are attached hereto as Exhibit “B.”

10 I declare under penalty of perjury and the laws of the State of California that the foregoing
11 is true and correct. Executed this 23rd day of January, 2014, in the City of San Diego, State of
12 California.

13 By: 
14 Ashley A. Escudero

1 Megan S. Wynne, Esq., SBN 183707
Ashley A. Escudero, Esq., SBN250473
2 **MORRIS POLICH & PURDY LLP**
One America Plaza
3 600 West Broadway, Suite 500
San Diego, California 92101
4 Tel: (619) 557-0404
Fax: (619) 557-0460

F I L E D
Clerk of the Superior Court
JAN 23 2014

5 Donald T. Ridley, Esq.
6 (*pro hac vice application to be filed*)
THE MANDEL LAW FIRM
7 370 Lexington Avenue, Suite 505
New York, NY 10017
8 Tel: (212) 697-7383
Fax: (212) 681-6157

9 Attorneys for Gerrit Lösch

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**

12 JOSE LOPEZ, an Individual,
13 Plaintiff,
14 v.
15 DOE 1, LINDA VISTA CHURCH; DOE
16 2, SUPERVISORY ORGANIZATION;
17 DOE 3, PERPETRATOR; and DOES 4
18 through 100, inclusive,
Defendants.

CASE NO. 37-2012-00099849-CU-PO-CTL
**APPLICATION OF DONALD T. RIDLEY,
ESQ. FOR ADMISSION TO THE BAR OF
THIS COURT PRO HAC VICE**
Date: January 28, 2014
Time: 8:30 a.m.
Dept: C-65
Judge: Hon. Joan M. Lewis
Trial Date: June 27, 2014

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20 I, Donald T. Ridley, apply for admission to practice before this Court *pro hac vice*, in order
21 to represent purported third-party witness Gerrit Lösch in this action. In support of this
22 application, I state the following:

23 1. My residence address is 550 Chieftain Street, #202, Osceola, WI 54020. My office
24 address from 2004 through 2012 was The Mandel Law Firm, 370 Lexington Avenue, Suite 505,
25 New York, NY 10017. I am not a resident of California, nor am I regularly engaged in the
26 practice of law in the State of California.

27 2. I currently am "of counsel" to The Mandel Law Firm and have been retained by
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1 Gerrit Lösch to appear in this action.

2 3. I was admitted to practice before the Court of Appeal in the State of New York and
3 all other courts in the State of New York on September 18, 1985. I am a member in good standing
4 of the New York courts. I was admitted to practice before the Supreme Court of the State of
5 Minnesota and all other courts in the State of Minnesota on December 15, 1982. I am currently an
6 inactive member of the Minnesota Bar.

7 4. I have not been suspended or disbarred in any court.

8 5. In the preceding two years, I have not applied to appear pro hac vice in any other
9 California actions.

10 6. Attorney Megan S. Wynne of Morris Polich & Purdy LLP, attorney of record in
11 this action, has agreed to act as associate counsel to Gerrit Lösch in this matter. Ms. Wynne's
12 address is One America Plaza, 600 West Broadway, Suite 500, San Diego, CA 92101.

13 7. Pursuant to California Rules of Court, Rule 9.40(c), and Code of Civil Procedure
14 section 1013a, Megan S. Wynne of Morris Polich & Purdy LLP is serving a true and correct copy
15 of this application and the Ex Parte Application for An Order Admitting Donald T. Ridley to
16 Appear *Pro Hac Vice* In This Action upon all parties who have appeared in this action and upon
17 the State Bar of California at its San Francisco office. (See California Rules of Court, Rule
18 9.40(c), and Code of Civil Procedure sections 1013a and 1005.)

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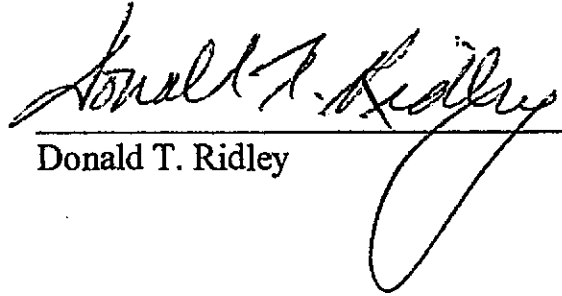
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1 8. The fee in the amount of \$50 along with a copy of this executed application and the
2 Ex Parte Application for Admission of Donald T. Ridley *Pro Hac Vice* in this action is being
3 submitted to the State Bar of California at its San Francisco office, pursuant to California Rules of
4 Court, Rule 9.40(e).

5 I declare under penalty of perjury under the laws of the State of California that the
6 foregoing statements are true and correct.

7 Executed on January 21, 2014, at Osceola, Wisconsin.

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10 Donald T. Ridley
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14 JAN 23 PM 4:41
FILED
Clerk of the Superior Court

JAN 30 2014

By: R. LINDSEY-COOPER, Deputy

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO, CENTRAL DIVISION

JOSE LOPEZ, an Individual,
Plaintiff,
v.
DOE 1, LINDA VISTA CHURCH; DOE
2, SUPERVISORY ORGANIZATION;
DOE 3, PERPETRATOR; and DOES 4
through 100, inclusive,
Defendants.

CASE NO. 37-2012-00099849-CU-PO-CTL

~~PROPOSED~~ ORDER ON EX PARTE
APPLICATION FOR ADMISSION OF
DONALD T. RIDLEY, ESQ. PRO HAC VICE

Date: January 28, 2014
Time: 8:30 a.m.
Dept: C-65
Judge: Joan M. Lewis
Trial Date: June 27, 2014

ORDER

The *Ex Parte* Application For Admission of Donald T. Ridley, Esq. *Pro Hac Vice* came on regularly for hearing on January 28, 2014, at 8:30 a.m. in Department 65 of the above-entitled Court, the Honorable Joan M. Lewis presiding. Appearances were as stated on the record at the time of the hearing. After consideration of all papers and evidence submitted and argument of counsel, and good cause appearing therefore, the application for Admission of Donald T. Ridley, Esq. *pro hac vice* is GRANTED.

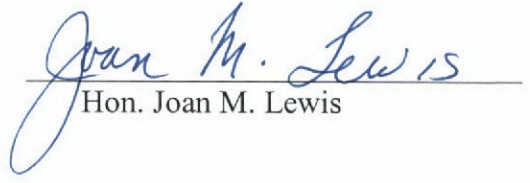
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As such, **IT IS HEREBY ORDERED** that Donald T. Ridley, Esq. is admitted *pro hac vice* to represent Mr. Lösch in connection with the Notice of Deposition and any other issues related to this action.

IT IS SO ORDERED.

Dated: January 30, 2014


Hon. Joan M. Lewis

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PROOF OF SERVICE

(Code Civ. Proc., §§ 1013a, 2015)

Jose Lopez v. Doe 1, Linda Vista Church, et al.; Case No. 37-2012-00099849-CU-PO-CTL
STATE OF CALIFORNIA, COUNTY OF SAN DIEGO

I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action; my business address is One American Plaza, 600 West Broadway, Suite 500, San Diego, California, 92101.

On January 23, 2014, I served the foregoing document described as **EX PARTE APPLICATION FOR ADMISSION OF DONALD T. RIDLEY, ESQ. PRO HAC VICE; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT THEREOF; DECLARATION OF ASHLEY A. ESCUDERO, APPLICATION OF DONALD T. RIDLEY, ESQ. FOR ADMISSION TO THE BAR OF THIS COURT PRO HAC VICE; AND [PROPOSED] ORDER** on the other parties in this action by placing a true copy thereof enclosed in sealed envelopes addressed as follows:

Devin M. Storey THE ZALKIN LAW FIRM 12555 High Bluff Drive, Suite 260 San Diego, CA 92130 (858) 259-3011 Fax: (858) 555-2312 Attorneys for Plaintiff	James M. McCabe THE MCCABE LAW FIRM, APC 4817 Santa Monica Avenue, Suite B San Diego, CA 92107 (619) 224-2848 Fax: (619) 224-0089 Attorneys for Doe 1, Linda Vista Church
Pro Hac Vice Program The State Bar of California 180 Howard Street San Francisco, CA 94105 <i>(Via Mail Only)</i>	Rocky K. Copley LAW OFFICES OF ROCKY K. COPLEY 225 Broadway, Suite 2100 San Diego, CA 92101 (619) 232-3131 Fax: (619) 232-1690 Calvin Rouse, Esq. (<i>Pro Hac Vice</i>) WATCHTOWER BIBLE AND TRACT SOCIETY OF NEW YORK, INC., LEGAL DEPARTMENT 100 Watchtower Drive Patterson, NY 12563 (845) 306-1000 Attorneys for Watchtower

By Mail: I caused each envelope, with postage thereon fully prepaid, to be placed in the United States mail at San Diego, California. I am readily familiar with the practice of Morris Polich & Purdy LLP for collecting and processing correspondence for mailing, said practice being that, in the ordinary course of business, mail is deposited in the United States Postal Service the same day as it is placed for collection.

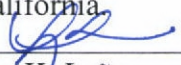
By Facsimile: I caused each document to be transmitted via the facsimile number(s) listed on the attached service list. The facsimile machine I used complied with California Rules of Court, rule 2003(3) and no error was reported by the machine pursuant to California Rules of Court, rule 2008(e).

By Personal Service: I delivered such envelope by hand to the offices of the addressee(s).

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I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on January 23, 2014, at San Diego, California.



Lisa K. Leão

EXHIBIT A

1 Hon. Vincent P. Di Figlia (Ret.)
2 Judicate West
3 402 West Broadway, Suite 2400
4 San Diego, CA 92101
5 Telephone: (619) 814-1966
6 Fax: (619) 814-1967

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8 SUPERIOR COURT FOR THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF SAN DIEGO, CENTRAL DIVISION
10

11 JOSE LOPEZ, an individual;

12 Plaintiff,

13 vs.

14 DOE 1, LINDA VISTA CHURCH, et al.

15 Defendants.
16

Case No. 37-2012-0099849-CU-PO-CTL

RECOMMENDATIONS OF DISCOVERY
REFEREE
CCP § 643

17 I

18 INTRODUCTION

19 This matter came on for hearing on December 13, 2013, in the offices of Judicate West,
20 402 West Broadway, Suite 2400, San Diego, CA 92101, before the Honorable Vincent P.
21 Di Figlia (Ret.) referee. Irwin M. Zalkin, Esq., Devin M. Storey, Esq. and Alexander S. Zalkin,
22 Esq. appeared on behalf of plaintiff Jose Lopez. Rocky K. Copley, Esq. appeared on behalf of
23 Watchtower Bible and Tract Society of New York, Inc. (sued as "Doe 2, Supervisory
24 Organization").

25 II

26 DISCUSSION

27 The case came before the referee on cross-motions by the appearing parties. Plaintiff
28 Lopez moved to compel the deposition testimony of the Watchtower Person Most Qualified

1 (hereinafter PMQ). In previous similar litigation, defendant Watchtower has designated Allen
2 Shuster as its PMQ. Plaintiff additionally seeks to obtain the deposition testimony of Gerrit
3 Losch. Mr. Losch is a long standing member of the Watchtower's "Governing Body." According
4 to deposition testimony given by Mr. Shuster (Plaintiff's Exhibit 9), the Governing Body
5 approves operational guidelines for the United States branch of the Jehovah's Witness
6 Organization, including directives for investigating and reporting of alleged childhood sexual
7 abuse within the church. Mr. Shuster has testified that the Governing Body oversees the
8 worldwide activity of Jehovah's Witnesses. (Plaintiff's Ex. 9 at 19-6-13)

9 Plaintiff's Notice of Deposition of PMQ sets forth 30 specific areas of inquiry and
10 requests production pursuant to C.C.P. §§ 2025 and 2019(a)(3) of 29 classes of documents,
11 (Plaintiff's Exhibit I) Defendant Watchtower has in turn objected to each and every proposed
12 topic of examination and each and every request for production.

13 Watchtower's grounds for objection are:

- 14 1. The information sought is protected from discovery by the minister-communicant
15 privilege (Cal. Evid. Code §§ 1033, 1034).
- 16 2. The information sought is protected from discovery by the First Amendment.
- 17 3. The information sought is protected by the attorney-client and/or work-product
18 doctrine.
- 19 4. The time frame of the request is overly broad, and the relevant area of enquiry should
20 be limited to the year 1986.

21 (See defendant's objections, Plaintiff Ex. 2)

22 These privilege claims have been raised in 2 prior discovery motions brought before
23 Judge Lewis as well as in a failed Motion for Summary Judgment/Adjudication. (Plaintiff's Ex.
24 3, 4 and 5.) In each instance, the aforementioned claims of privilege were found to be without
25 merit, except as to 4 documents deemed privileged under Evidence Code §§1033 and 1034.
26 (Plaintiff's Ex. 3)

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1 As previously noted, this matter came before the referee ostensibly on cross-motions. In
2 setting the hearing, counsel for Watchtower indicated he would be filing a Motion for a
3 Protective Order precluding the deposition testimony of Gerrit Losch.

4 Defendant's opening brief withdrew the request as premature, claiming the notice was
5 defective.

6 In reply, defendant submits the declaration of Danny L. Bland, an employee in
7 defendant's treasurer's office who declares that a search of the records in the treasurer's office
8 reveals that "Gerrit Losch has never been an officer, director, managing agent or employee of
9 Watchtower Bible and Tract Society of New York, Inc." (Bland Decl. p. 2, lines 3-11)

10 III

11 RECOMMENDATION

12 A. DEPOSITION OF GERRIT LOSCH

13 The referee recommends that plaintiff be permitted to depose Mr. Losch. The deposition
14 testimony of Mr. Shuster establishes that the Governing Body, of which Mr. Losch is a member
15 is the principal overseer of the church's activities. Mr. Losch is the longest serving member of
16 the Governing Body and may well possess knowledge pertinent to this litigation.

17 It is noteworthy that opposition to Mr. Losch's deposition was based solely on the
18 previously mentioned Bland declarations. Defendant did not invoke the "apex" grounds as a
19 reason to preclude Mr. Losch's deposition. See *Liberty Mutual Ins. Co. v. Superior Court*, (1992)
20 10 Cal. App. 4th 1282.

21 Despite Mr. Bland's declaration, the referee believes that Mr. Losch's position as a
22 member of the Governing Body and its functions as described by Mr. Shuster, make Mr. Losch a
23 managing agent within the contemplation of the law. C.C.P. § 2025.280(a)

24 B. DEPOSITION OF WATCHTOWER'S PMQ and ACCOMPANYING REQUEST FOR
25 PRODUCTION

26 This honorable court has already ruled on issues of privilege and privacy in this case. It is
27 the referee's recommendation that the deposition of the PMQ be allowed to go forward on the
28 topics enumerated, and that the PMQ be required to produce the documents in question which I

1 believe are relevant to the subject matter of the lawsuit in many areas, including subsequent
2 ratification by the church, if any.

3 To the extent the documents produced might invade the privacy rights of third parties,
4 defendant may produce documents wherein the names, addresses, e-mail addresses, telephone
5 numbers and social security number of third-parties have been redacted.

6 Additionally, in that the court has previously reviewed in camera and withheld some
7 documents pursuant to Evidence Code §§ 1033 and 1034, the referee recommends that defendant
8 prepare a privilege log and provide for in camera review by me those documents which may fall
9 within the minister-communicant and/or attorney/client or work produce privileges.

10 Respectfully submitted,

11
12 
13 HON. VINCENT P. DI FIGLIA (Ret.)
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16 Dated: December 20, 2013
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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF ORANGE:

I am employed in the County of Orange, State of California. I am over the age of 18 and am not a party to the within action. My business address is 1851 East First Street, Suite 1600, Santa Ana, California 92705.

On December 23, 2013 I served the **RECOMMENDATIONS OF DISCOVERY REFEREE** on the following parties in the **Lopez vs. Linda Vista Spanish Congregation, et al.** by placing a true copy to all parties as follows:

Irwin M. Zalkin, Esq.
Devin M. Storey, Esq.
The Zalkin Law Firm, P.C.
12555 High Bluff Drive, Suite 260
San Diego, CA 92130
Email: irwin@zalkin.com
EEmail: dms@zalkin.com

Calvin A. Rouse, Esq.
Mario F. Moreno, Esq.
Watchtower Bible & Tract Society of New York, Inc.
100 Watchtower Drive
Patterson, NY 12563-9204
EEmail: crouse@jw.org
EEmail: mfmorenolaw@gmail.com

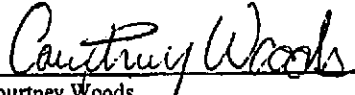
James M. McCabe, Esq.
Law Offices of James M. McCabe
4817 Santa Monica Ave.
Suite B
San Diego, CA 92107
EEmail: jim@mccabelaw.net

Rocky K. Copley, Esq.
Law Offices of Rocky K. Copley
225 Broadway
Suite 2100
San Diego, CA 92101
EEmail: rkcopley@rkc-rocklaw.com

Hon. Joan M. Lewis
Superior Court of California
County of San Diego
220 West Broadway
San Diego, CA 92101
US Mail Only

- | | |
|---|--|
| <input checked="" type="checkbox"/> BY U.S. MAIL: | I caused such envelope(s), with postage fully prepaid, to be placed in the U.S. Mail at Santa Ana, California. |
| <input type="checkbox"/> BY FACSIMILE: | I caused such document to be sent via facsimile to each person on the attached mailing list. |
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| <input checked="" type="checkbox"/> STATE: | I declare under penalty of perjury under the laws of the State of California that the above is true and correct. |
| <input type="checkbox"/> FEDERAL: | I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. |

Executed on December 23, 2013 at Santa Ana, California.



Courtney Woods
Judicate West

EXHIBIT B



**Morris
Polich &
Purdy**^{LLP}

ATTORNEYS AT LAW

www.mpplaw.com

Ashley A. Escudero
aescudero@mpplaw.com

January 23, 2014

VIA U.S. MAIL

State Bar of California
Office of Certification
180 Howard Street
San Francisco, California 94105-1639

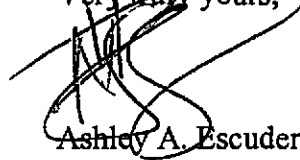
**Re: Jose Lopez v. Linda Vista Church, et al.
San Diego Superior Court – Central Division
Case No. 37-2012-00099849-CU-PO-CTL**

Dear Sir or Madam:

Pursuant to California *Rules of Court*, Rule 9.40, enclosed please find a copy of the Ex Parte Application for Admission of Donald T. Ridley, Esq. *Pro Hac Vice*, including the verified application of Mr. Ridley. One check in the amount of \$50.00 is submitted herewith on behalf of Mr. Ridley.

Please contact me if you have any questions. Thank you.

Very truly yours,



Ashley A. Escudero

AAE:kl
SD227318.DOCX

600 West Broadway, Suite 500, San Diego, California 92101-3357

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Fx: 619.557.0460

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MORRIS POLICH & PURDY, LLP
 (SAN DIEGO FILING FEE ACCOUNT)
 600 WEST BROADWAY, STE. 500
 SAN DIEGO, CA 92101

12853

16-1606/1220
102

DATE January 23, 2014

PAY TO THE ORDER OF State Bar of California \$ 50.00

Fifty Dollars and no/100

SECURITY FEATURES REQUIRED OVER \$250

DOLLARS



CITY NATIONAL BANK
 City National Plaza
 213-673-7700
 525 South Flower St., Ste. 110
 Los Angeles, CA 90071

TWO SIGNATURES REQUIRED OVER \$250

[Handwritten Signature]

MP

⑆00012853⑆ ⑆12201606⑆ 201039309⑆

DETACH AND RETAIN THIS STATEMENT
 THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW. IF NOT CORRECT PLEASE NOTIFY US PROMPTLY. NO RECEIPT DESIRED.
MORRIS POLICH & PURDY, LLP

DATE	DESCRIPTION	AMOUNT
1/23/2014	State Bar of California Office of Certification 180 Howard Street San Francisco, CA 94105 Lopez/Watchtower Ex Parte Hearing Pro Hac Vice Fees - Donald R. Ridley 35665-36932 AAE	\$50.00