

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

F I L E D
Clerk of the Superior Court

JAN 28 2014

By: C. REIN, Deputy

'14 JAN 28 PM 207

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

**SUPPLEMENTAL DECLARATION OF
ASHLEY A. ESCUDERO IN SUPPORT OF
EX PARTE APPLICATION FOR ADMISSION
OF DONALD T. RIDLEY, ESQ. PRO HAC
VICE**

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

21
22
23 **TO THIS HONORABLE COURT AND TO ALL PARTIES AND TO THEIR**
24 **ATTORNEYS OF RECORD:**

25 Specially-appearing nonparty witness Gerrit Lösch hereby submits the Supplemental
26 Declaration of Ashley A. Escudero in Support of the Ex Parte Application of Gerrit Lösch for
27 Admission of Donald T. Ridley, Esq., *Pro Hac Vice*.

1 **SUPPLEMENTAL DECLARATION OF ASHLEY A. ESCUDERO IN SUPPORT OF EX**
2 **PARTE APPLICATION OF GERRIT LÖSCH FOR ADMISSION OF DONALD T.**
3 **RIDLEY, ESQ., *PRO HAC VICE***

4 I, Ashley A. Escudero, declare as follows:

5 1. I am an attorney duly licensed to practice before all courts in the State of California
6 and am an associate at the law firm of Morris, Polich & Purdy LLP. I am the local attorney of
7 record for Gerrit Lösch, and have personal knowledge of the facts stated herein. If called as a
8 witness, I could and would competently testify to the following.

9 2. On behalf of my client, Gerrit Lösch, I filed and served the Ex Parte Application of
10 Gerrit Lösch for Admission of Donald T. Ridley, Esq., *Pro Hac Vice*, Memorandum Of Points And
11 Authorities In Support Thereof; Declaration Of Ashley A. Escudero, Application Of Donald T.
12 Ridley, Esq. For Admission To The Bar Of This Court Pro Hac Vice; and [Proposed] Order on all
13 parties of record on January 24, 2014. As set forth in the Ex Parte Application, the hearing date
14 was set for January 28, 2014.

15 3. On January 24, 2014, I received a phone message from Plaintiff's counsel, Devin M.
16 Storey, Esq. I immediately contacted Mr. Storey who informed me that his office was unavailable
17 on January 28, 2014, to attend the ex parte hearing. Mr. Storey asked that I move the hearing date
18 to either January 30, 2014, or February 6, 2014; two dates for which ex parte applications submitted
19 by parties in this case were already scheduled to be heard.


20 4. I contacted the Clerk of the Court on January 24, 2014, to request the hearing be
21 moved to either January 30 or February 6. The clerk was able to accommodate my request and
22 graciously rescheduled the hearing to January 30, 2014.

23 5. I contacted Mr. Storey by phone to informally notify him that the hearing had been
24 rescheduled to January 30, 2014 at 8:30 a.m. During that conversation Mr. Storey informed me his
25 client may file an Opposition to the Ex Parte Application of Gerrit Lösch for Admission of Donald
26 T. Ridley, Esq., *Pro Hac Vice*.

27 6. I contacted Mr. Storey on the morning of January 27, 2014. I asked Mr. Storey if he
28 would share with me the grounds upon which his client would oppose the Ex Parte Application of

1 Gerrit Lösch for Admission of Donald T. Ridley, Esq., *Pro Hac Vice*. Mr. Storey informed me that
2 he was considering whether or not to file an opposition to the Ex Parte Application of Gerrit Lösch
3 for Admission of Donald T. Ridley, Esq., *Pro Hac Vice*, and advised that he would contact me by
4 the end of the day with his decision. Before the end of the day on January 27, 2014, Mr. Storey
5 contacted me by phone and informed me that Plaintiff will not oppose the Ex Parte Application of
6 Gerrit Lösch for Admission of Donald T. Ridley, Esq., *Pro Hac Vice*.

7 I declare under penalty of perjury and the laws of the State of California that the foregoing
8 is true and correct. Executed this 28th day of January, 2014, in the City of San Diego, State of
9 California.

10 By:  _____
11 Ashley A. Escudero
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

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 28, 2014, I served the foregoing document described as: **SUPPLEMENTAL DECLARATION OF ASHLEY A. ESCUDERO IN SUPPORT OF EX PARTE APPLICATION FOR ADMISSION OF DONALD T. RIDLEY, ESQ. PRO HAC VICE** 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
	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 Fax: (845) 306.0709 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).

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

2 Executed on January 28, 2014, at San Diego, California.

3 

4 Lisa K. Leão

5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28