

1 FITZGERALD KREDITOR BOLDUC RISBROUGH LLP
Michael J. FitzGerald (SBN 70842)
2 mfitzgerald@fkbrlegal.com
Natalie F. Foti (SBN 259351)
3 nfoti@fkbrlegal.com
2 Park Plaza, Suite 850
4 Irvine, California 92614
Telephone: (949) 788-8900
5 Facsimile: (949) 788-8980

6 Attorneys for Defendant GENE JAMES

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF ORANGE
CENTRAL JUSTICE CENTER
MAR 20 2023
DAVID H. YAMASAKI, Clerk of the Court
BY: DO DEPUTY

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
9 **FOR THE COUNTY OF ORANGE – CENTRAL JUSTICE CENTER**

11 JAMES BIEBER,
12 Plaintiff,
13 v.
14 GENE JAMES and DOES 1-50, inclusive,
15 Defendants.

Case No. 30-2020-01145593-CU-DF-CJC
[Unlimited Jurisdiction]
[Assigned for all purposes to:
Honorable David Hoffer – Dept. C16]

~~PROPOSED~~ JUDGMENT

Complaint Filed: May 26, 2020
Trial Date: Vacated

21 On December 14, 2022, plaintiff JAMES BEIBER (“Plaintiff”) filed a voluntary dismissal of
22 this entire action without prejudice. On the same day, the clerk entered the Dismissal. A true and correct
23 copy of the Dismissal is attached as Exhibit A.

24 The filing of a dismissal without prejudice makes defendant GENE JAMES (“Defendant”) the
25 prevailing party and entitled to file a cost bill (*Cano v. Glover* (2006) 143 Cal. 4th 326, 331 [defendant
26 in action that was dismissed without prejudice was entitled to costs under Code of Civil Procedure
27 section 1032(a)(4)]; *Fries v. Rite Aid Corp.* (2009) 173 Cal.App.4th 182). The court retains jurisdiction
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1 to award costs despite entry of the dismissal (*Brown v. Desert Christian Ctr.* (2011) 193 Cal.App.4th
2 733, 738).


3 On December 29, 2022, Defendant timely filed and served a Memorandum of Costs in the
4 amount of \$15,028.08 as the “prevailing party” under Code of Civil Procedure section 1032(a)(4), true
5 and correct copy of which is attached as **Exhibit B**.

6 Plaintiff did not timely file a motion to strike or tax Defendant’s cost bill within the time
7 allowable under California Rules of Court, Rule 3.1700(b)(1).

8 California Rules of Court, Rule 3.1700(b)(4) provides: “After the time has passed for a motion
9 to strike or tax costs or for determination of that motion, the clerk must immediately enter the costs on
10 the judgment.”

11 Based on the foregoing, IT IS HEREBY ORDERED, ADJUDGED, AND DECREED that
12 Defendant GENE JAMES shall have costs of suit awarded in his favor and against Plaintiff JAMES
13 BIEBER in the amount and sum of \$15,028.08.

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15 DATED: 3/20/23

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17 Hon. David Hoffer
18 JUDGE OF THE SUPERIOR COURT
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EXHIBIT A

CIV-110

ATTORNEY OR PARTY WITHOUT ATTORNEY: STATE BAR NO: 189780 NAME: PAUL J. CARTER FIRM NAME: BERGKVIST BERGKVIST & CARTER, LLP STREET ADDRESS: 400 Oceangate, Suite 800 CITY: Long Beach STATE: CA ZIP CODE: 90802 TELEPHONE NO.: (562) 435-1426 FAX NO.: (562) 495-4255 E-MAIL ADDRESS: pc@lawbbc.com ATTORNEY FOR (Name): Plaintiff, JAMES BIEBER	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE STREET ADDRESS: 700 Civic Center Drive West MAILING ADDRESS: 700 Civic Center Drive West CITY AND ZIP CODE: Santa Ana, 92701 BRANCH NAME: Central Justice Center	
Plaintiff/Petitioner: JAMES BIEBER Defendant/Respondent: GENE JAMES	
REQUEST FOR DISMISSAL	CASE NUMBER: 30-2020-01145593-CU-DF-CJC
A conformed copy will not be returned by the clerk unless a method of return is provided with the document.	
This form may not be used for dismissal of a derivative action or a class action or of any party or cause of action in a class action. (Cal. Rules of Court, rules 3.760 and 3.770.)	

1. TO THE CLERK: Please dismiss this action as follows:
- a. (1) With prejudice (2) Without prejudice
 - b. (1) Complaint (2) Petition
 - (3) Cross-complaint filed by (name): _____ on (date): _____
 - (4) Cross-complaint filed by (name): _____ on (date): _____
 - (5) Entire action of all parties and all causes of action
 - (6) Other (specify):*
2. (Complete in all cases except family law cases.)
 The court did did not waive court fees and costs for a party in this case. (This information may be obtained from the clerk. If court fees and costs were waived, the declaration on the back of this form must be completed)

Date: December 14, 2022
 PAUL J. CARTER

(TYPE OR PRINT NAME OF ATTORNEY PARTY WITHOUT ATTORNEY)


 (SIGNATURE)

*If dismissal requested is of specified parties only of specified causes of action only, or of specified cross-complaints only, so state and identify the parties, causes of action, or cross-complaints to be dismissed.

Attorney or party without attorney for:
 Plaintiff/Petitioner Defendant/Respondent
 Cross Complainant

3. TO THE CLERK: Consent to the above dismissal is hereby given.**
 Date: _____

(TYPE OR PRINT NAME OF ATTORNEY PARTY WITHOUT ATTORNEY)


 (SIGNATURE)


** If a cross-complaint - or Response (Family Law) seeking affirmative relief - is on file, the attorney for cross-complainant (respondent) must sign this consent if required by Code of Civil Procedure section 681 (i) or (j).

Attorney or party without attorney for:
 Plaintiff/Petitioner Defendant/Respondent
 Cross Complainant

(To be completed by clerk)

- 4. Dismissal entered as requested on (date): 12/14/2022
- 5. Dismissal entered on (date): _____ as to only (name): _____
- 6. Dismissal not entered as requested for the following reasons (specify): _____
- 7. a. Attorney or party without attorney notified on (date): _____
- b. Attorney or party without attorney not notified. Filing party failed to provide
 a copy to be conformed means to return conformed copy

Date: 12/14/2022 Clerk, by _____
 Form 106 DAVID H. YAMASAKI, Clerk of the Court


 A. Nguyen-Do, Deputy
 Code of Civil Procedure, § 681 et seq.; Gov. Code, § 68090
 Cal. Rules of Court, rule 3.1390
 www.courts.ca.gov

Plaintiff/Petitioner: JAMES BIEBER
Defendant/Respondent: GENE JAMES

CASE NUMBER:
30-2020-01146593-CU-DF-CJC

COURT'S RECOVERY OF WAIVED COURT FEES AND COSTS

If a party whose court fees and costs were initially waived has recovered or will recover \$10,000 or more in value by way of settlement, compromise, arbitration award, mediation settlement, or other means, the court has a statutory lien on that recovery. The court may refuse to dismiss the case until the lien is satisfied. (Gov. Code, § 68637.)

Declaration Concerning Waived Court Fees

1. The court waived court fees and costs in this action for *(name)*:
2. The person named in item 1 is *(check one below)*:
 - a. not recovering anything of value by this action.
 - b. recovering less than \$10,000 in value by this action.
 - c. recovering \$10,000 or more in value by this action. *(If item 2c is checked, item 3 must be completed.)*
3. All court fees and court costs that were waived in this action have been paid to the court *(check one)*: Yes No

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

Date:

(TYPE OR PRINT NAME OF ATTORNEY PARTY MAKING DECLARATION)

(SIGNATURE)

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is 400 Oceangate, Suite 800, Long Beach, California 90802-4307.

On **December 14, 2022**, I served the following documents **REQUEST FOR DISMISSAL** (Pursuant to C.C.P. Section 1010.6, the above document was served electronically on the parties appearing on the service list associated with this case at their respective email addresses).

Attorney for Defendant Gene James,

Michael J. FitzGerald
Natalie F. Foti
FitzGerald Kreditor Bolduc Risbrough LLP
2 Park Plaza, Suite 850
Irvine, CA 92614
Email: mfitzgerald@fkbrlegal.com;
nfoti@fkbrlegal.com

Executed on **December 14, 2022**, at Long Beach, California.

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

(Federal) I declare that I am employed in the office of a member of the bar of this court at those direction the service was made.


LIZ AMOZOC

EXHIBIT B

1 FITZGERALD KREDITOR BOLDUC RISBROUGH LLP
Michael J. FitzGerald (SBN 70842)
2 mfitzgerald@fkbrlegal.com
2 Park Plaza, Suite 850
3 Irvine, California 92614
Telephone: (949) 788-8900
4 Facsimile: (949) 788-8980
5 Attorneys for Defendant GENE JAMES

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7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **FOR THE COUNTY OF ORANGE – CENTRAL JUSTICE CENTER**
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10 JAMES BIEBER,
11 Plaintiff,
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13 v.
14 GENE JAMES and DOES 1-50, inclusive,
15 Defendants.

Case No. 30-2020-01145593-CU-DF-CJC
[Unlimited Jurisdiction]
[Hon. David Hoffer – Dept. C16]

**MEMORANDUM OF COSTS
(WORKSHEET)**

Complaint Filed: May 26, 2020
Trial Date: November 14, 2022

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1 **MEMORANDUM OF COSTS (WORKSHEET)**

2 *(Base on Optional Judicial Council Form MC-011)*

3 **1. Filing and motion fees**

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Paper filed	Filing Fee
Initial Appearance Fees	\$435.00

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8 TOTAL 1: \$435.00

9 **2. Jury fees**

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Date	Fees & mileage
a.	\$
b.	\$
c.	\$
d.	\$
e.	\$

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16 TOTAL 2: \$0.00

17 **3. Juror food: \$0.00 and lodging: \$0.00**

18 TOTAL 3: \$0.00

19 **4. Deposition costs**

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Name of deponent	Taking	Transcribing	Travel	Videotaping	Subtotals
a. James Bieber	\$	\$	\$	\$	\$1,656.75
b. Kellie Bieber	\$	\$	\$	\$	\$811.50
c. Steve Knoblock	\$	\$	\$	\$	\$1,080.00
d. Anthony Rubolina	\$	\$	\$	\$	\$1,136.02
e. Melissa Phelps McCready	\$	\$	\$	\$	\$610.40
f. Martina McBurney-Wheeler	\$	\$	\$	\$	\$1,179.37
g. Gene James	\$	\$	\$	\$	\$2,544.68

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28 TOTAL 4: \$9,018.72

1 **5. Service of process**

Name of person served	Public officer	Registered processor	Publication	Other (<i>specify</i>)
a.	\$	\$	\$	\$
b.	\$	\$	\$	\$
c.	\$	\$	\$	\$

7 TOTAL 5: \$0.00

8 **6. Attachment expenses (*specify*):** _____ 6. \$0.00

9 **7. Surety bond premiums (*itemize bonds and amounts*):** _____ 7. \$0.00

10 **8(a). Ordinary witness fees**

Name of witness	Daily fee	Mileage	Total
(1)			\$
(2)			\$
(3)			\$
(4)			\$
(5)			\$

18 SUBTOTAL 8a. \$0.00

19 **8(b). Expert fees (*per Code of Civil Procedure section 998*)**

Name of witness	Fee	Total
(1)		\$
(2)		\$
(3)		\$
(4)		\$

26 SUBTOTAL 8b. \$0.00

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1 **8(c). Court-ordered expert fees**

Name of witness	Fee	Total
(1)		\$
(2)		\$

6 SUBTOTAL 8c. \$0.00

7 TOTAL (8a, 8b, & 8c) 8. \$0.00

8 **9. Court-ordered transcripts (specify):** _____ 9. \$0.00

9 **10. Attorney fees (enter here if contractual or statutory fees are fixed without necessity of a court**
10 **determination; otherwise a noticed motion is required):** _____ 10. \$0.00

11 **11. Models, enlargements, and photocopies of exhibits (specify):** _____ 11. \$0.00

12 **12. Court reporter fees (as established by statute)**

<i>(Name of reporter):</i>	Fees: \$
<i>(Name of reporter):</i>	Fees: \$

15 TOTAL 12: \$0.00

16 **13. Interpreter fees**

a. Fees for certified or registered interpreter for the deposition of a party or witness	
<i>(Name of interpreter):</i>	Fees: \$
<i>(Name of interpreter):</i>	Fees: \$
b. Fees for a qualified court interpreter authorized by the court for an indigent person represented by a qualified legal service project or pro bono attorney	
<i>(Name of interpreter):</i>	Fees: \$
<i>(Name of interpreter):</i>	Fees: \$

24 TOTAL 13: \$0.00

25 **14. Fees for electronic filing or service of documents through an electronic filing service**
26 **provider (enter here if required by the court):** _____ 14. \$894.43

27 **15. Fees for hosting electronic documents through an electronic filing service provider (enter**
28 **here if required by the court):** _____ 15. \$0.00

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16. Other (specify): Subpoena Services, Copies and Postage, Fees for Services of Subpoenas

Description	Total
Computer Legal Research Fees	\$3,192.07
Copies and Postage	\$11.13
Fees for Services of Subpoenas <ul style="list-style-type: none"> • Subpoena of records, COX Communication (\$54.52) • Subpoena for Personal Appearance, Steve Knoblock (\$140.00) • Subpoena of records, Steve Knoblock (\$109.21) • Subpoena for Personal Appearance, Melissa Phelps McCready (\$140.00) • Records from Melissa Phelps McCready (\$197.00) • Subpoena for Personal Appearance, Anthony Rubolino (\$140.00) • Subpoena for Personal Appearance & Records, Martina McBurney-Wheeler (\$462.00) • Service fees, Deposition of Kellie Bieber (\$92.00) • Service fees, Deposition of Kellie Bieber (\$142.00) 	\$1,476.73
TOTAL 16. \$4,679.93	
TOTAL COSTS	\$15,028.08

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PROOF OF SERVICE
James Bieber v. Gene James
OCSC Case No.: 30-2020-01145593-CU-DF-CJC

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 2 Park Plaza, Suite 850, Irvine, California 92614.

On December 29, 2022, I served the foregoing document(s) described as:

MEMORANDUM OF COSTS (WORKSHEET)

on the interested parties in this action by placing a true copy the original thereof addressed as follows:

Paul J. Carter, Esq.
Bergkvist, Bergkvist & Carter, LLP
400 Oceangate, Suite 800
Long Beach, CA 90802
T: 562-435-1426
F: 562-495-4255
E: pc@lawbbc.com

Attorneys for Plaintiff JAMES BIEBER

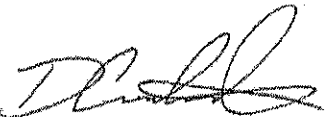
(MAIL) (C.C.P. § 1013(a)) Pursuant to CCP § 1013(a) and under firm practice said envelope would be deposited with the U.S. Postal Service on the same day with postage thereof fully prepaid at Irvine, California in the ordinary course of business. I am readily familiar with FitzGerald Kreditor Bolduc Risbrough LLP's ordinary business practice of collection and processing correspondence for mailing. I followed this business practice and I placed the envelope for collection and mailing on the date identified above. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage date is more than one day after date of deposit for mailing in affidavit.

(ELECTRONIC SERVICE) (CCP § 1010.6(a)(4)) I caused such document(s) to be electronically served on all interested parties in this action shown by email. Electronic service is complete at the time of transmission. My electronic notification address is: dcastaneda@fkbrlegal.com.

(ELECTRONIC SERVICE) (CCP § 1010.6(a)(4)) I caused such document(s) to be electronically served on all interested parties in this action via One Legal which is then printed and maintained with the original documents in our office. Electronic service is complete at the time of transmission. My electronic notification address is: 2 Park Plaza, Suite 850, Irvine, California 92614 and my e-mail address is: dcastaneda@fkbrlegal.com.

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

Executed on December 29, 2022, at Irvine, California.



Desiray Castaneda

MC-010

ATTORNEY OR PARTY WITHOUT ATTORNEY STATE BAR NUMBER: NAME: Michael J. FitzGerald (SBN 70842) / Charles C. McKenna (SBN167169) FIRM NAME: FITZGERALD KREDITOR BOLDUC RISBROUGH LLP STREET ADDRESS: 2 Park Plaza, Suite 850 CITY: Irvine STATE: CA ZIP CODE: 92614 TELEPHONE NO.: (949)788-8900 FAX NO.: (949)788-8980 E-MAIL ADDRESS: mfitzgerald@fkbrlegal.com / cmckenna@fkbrlegal.com ATTORNEY FOR (name): defendant, GENE JAMES	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF ORANGE STREET ADDRESS: 700 W. Civic Center Drive MAILING ADDRESS: 700 W. Civic Center Drive CITY AND ZIP CODE: Santa Ana, CA 92701 BRANCH NAME: Central Justice Center	
PLAINTIFF: JAMES BIEBER DEFENDANT: GENE JAMES	
MEMORANDUM OF COSTS (SUMMARY)	CASE NUMBER: 30-2020-01145593-CU-DF-CJC

The following costs are requested:

	\$	TOTALS
1. Filing and motion fees	\$	435.00
2. Jury fees	\$	
3. Jury food and lodging	\$	
4. Deposition costs	\$	9,018.72
5. Service of process	\$	
6. Attachment expenses	\$	
7. Surety bond premiums	\$	
8. Witness fees	\$	
9. Court-ordered transcripts	\$	
10. Attorney fees (enter here if contractual or statutory fees are fixed without necessity of a court determination; otherwise a noticed motion is required)	\$	
11. Court reporter fees as established by statute	\$	
12. Models, enlargements, and photocopies of exhibits	\$	
13. Interpreter fees	\$	
14. Fees for electronic filing or service	\$	894.43
15. Fees for hosting electronic documents	\$	
16. Other	\$	4,679.93
TOTAL COSTS	\$	15,028.08

I am the attorney, agent, or party who claims these costs. To the best of my knowledge and belief this memorandum of costs is correct and these costs were necessarily incurred in this case.

Date: December 28, 2022

Michael J. FitzGerald, Esq.

 (TYPE OR PRINT NAME)


 (SIGNATURE OF DECLARANT)

(Proof of service on reverse)

SHORT TITLE
James Bleber v. Gene James

CASE NUMBER:
30-2020-01146593-CU-DF-CJC

PROOF OF MAILING PERSONAL DELIVERY

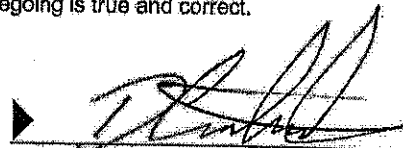
1. At the time of mailing or personal delivery, I was at least 18 years of age and **not a party** to this legal action.
2. My residence or business address is (*specify*):
Desiray Castaneda // FITZGERALD KREDITOR BOLDUC RISBROUGH LLP
2 Park Plaza, Suite 850, Irvine, CA 92614
3. I mailed or personally delivered a copy of the *Memorandum of Costs (Summary)* as follows (*complete either a or b*):
 - a. **Mail.** I am a resident of or employed in the county where the mailing occurred.
 - (1) I enclosed a copy in an envelope AND
 - (a) **deposited** the sealed envelope with the United States Postal Service with the postage fully prepaid.
 - (b) **placed** the envelope for collection and mailing on the date and at the place shown in items below following our ordinary business practices. I am readily familiar with this business' practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.
 - (2) The envelope was addressed and mailed as follows:
 - (a) Name of person served: Paul J. Carter, Esq
 - (b) Address on envelope:
Bergkvist, Bergkvist & Carter, LLP
400 Oceangate, Suite 800, Long Beach, CA 90802
 - (c) Date of mailing: 12/29/2022
 - (d) Place of mailing (*city and state*): Irvine, CA
 - b. **Personal delivery.** I personally delivered a copy as follows:
 - (1) Name of person served:
 - (2) Address where delivered:
 - (3) Date delivered:
 - (4) Time delivered:

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

Date: December 29, 2022

Desiray Castaneda

(TYPE OR PRINT NAME)


(SIGNATURE OF DECLARANT)

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PROOF OF SERVICE
James Bieber v. Gene James
OCSC Case No.: 30-2020-01145593-CU-DF-CJC

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 2 Park Plaza, Suite 850, Irvine, California 92614.

On December 29, 2022, I served the foregoing document(s) described as:

MEMORANDUM OF COSTS (SUMMARY)

on the interested parties in this action by placing a true copy the original thereof addressed as follows:

Paul J. Carter, Esq.
Bergkvist, Bergkvist & Carter, LLP
400 Oceangate, Suite 800
Long Beach, CA 90802
T: 562-435-1426
F: 562-495-4255
E: pc@lawbbc.com

Attorneys for Plaintiff JAMES BIEBER

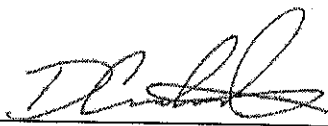
(MAIL) (C.C.P. § 1013(a)) Pursuant to CCP § 1013(a) and under firm practice said envelope would be deposited with the U.S. Postal Service on the same day with postage thereof fully prepaid at Irvine, California in the ordinary course of business. I am readily familiar with FitzGerald Kreditor Bolduc Risbrough LLP's ordinary business practice of collection and processing correspondence for mailing. I followed this business practice and I placed the envelope for collection and mailing on the date identified above. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage date is more than one day after date of deposit for mailing in affidavit.

(ELECTRONIC SERVICE) (CCP § 1010.6(a)(4)) I caused such document(s) to be electronically served on all interested parties in this action shown by email. Electronic service is complete at the time of transmission. My electronic notification address is: dcastaneda@fkbrlegal.com.

(ELECTRONIC SERVICE) (CCP § 1010.6(a)(4)) I caused such document(s) to be electronically served on all interested parties in this action via One Legal which is then printed and maintained with the original documents in our office. Electronic service is complete at the time of transmission. My electronic notification address is: 2 Park Plaza, Suite 850, Irvine, California 92614 and my e-mail address is: dcastaneda@fkbrlegal.com.

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

Executed on December 29, 2022, at Irvine, California.



Desiray Castaneda

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PROOF OF SERVICE
James Bieber v. Gene James
OCSC Case No.: 30-2020-01145593-CU-DF-CJC

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action; my business address is 2 Park Plaza, Suite 850, Irvine, California 92614.

On March 17, 2023, I served the foregoing document(s) described as:

[PROPOSED] JUDGMENT

on the interested parties in this action by placing a true copy the original thereof addressed as follows:

Paul J. Carter, Esq.
Bergkvist, Bergkvist & Carter, LLP
400 Oceangate, Suite 800
Long Beach, CA 90802
T: 562-435-1426
F: 562-495-4255
E: pc@lawbbc.com

Attorneys for Plaintiff JAMES BIEBER


(MAIL) (C.C.P. § 1013(a)) Pursuant to CCP § 1013(a) and under firm practice said envelope would be deposited with the U.S. Postal Service on the same day with postage thereof fully prepaid at Irvine, California in the ordinary course of business. I am readily familiar with FitzGerald Kreditor Bolduc Risbrough LLP's ordinary business practice of collection and processing correspondence for mailing. I followed this business practice and I placed the envelope for collection and mailing on the date identified above. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage date is more than one day after date of deposit for mailing in affidavit.

(ELECTRONIC SERVICE) (CCP § 1010.6(a)(4)) I caused such document(s) to be electronically served on all interested parties in this action shown by email. Electronic service is complete at the time of transmission. My electronic notification address is: dcastaneda@fkbrlegal.com.

(ELECTRONIC SERVICE) (CCP § 1010.6(a)(4)) I caused such document(s) to be electronically served on all interested parties in this action via One Legal which is then printed and maintained with the original documents in our office. Electronic service is complete at the time of transmission. My electronic notification address is: 2 Park Plaza, Suite 850, Irvine, California 92614 and my e-mail address is: dcastaneda@fkbrlegal.com.

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

Executed on March 17, 2023, at Irvine, California.



Desiray Castaneda