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15 *Attorneys for Plaintiffs*

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17 **COUNTY OF LOS ANGELES**

18 KESHARA SHAW; ALMA ROSA FARIAS DE  
SOLANO; JOSUE RICARDO GASTELUM-  
19 CAMPISTA; MARITZA GONZALEZ; RONNIE  
HEARD, JR.; DEYANIRA HOOPER; JUDITH  
20 LARSON; VICENTA MARTINEZ; AND  
AKELA WROTEN, JR.,

21 Plaintiffs,

22 v.

23 LOS ANGELES UNIFIED SCHOOL  
DISTRICT; AUSTIN BEUTNER, Los Angeles  
24 Unified School District Superintendent; and  
25 DOES 1-25, inclusive,

26 Defendants.

27 UNITED TEACHERS LOS ANGELES,

28 Relief Defendant.

**FILED**  
Superior Court of California  
County of Los Angeles

FEB 25 2021

Sherri R. Carter, Executive Officer/Clerk of Court  
By Tanya Herrera Deputy  
Tanya Herrera

Case No. 20STCV36489

Honorable Yvette M. Palazuelos  
Dept. 9

**PLAINTIFFS' NOTICE OF MOTION AND  
MOTION TO COMPEL PRELIMINARY  
INJUNCTION DISCOVERY**

*[Memorandum of Points And Authorities,  
Declaration of Edward Hillenbrand, Separate  
Statement, and [Proposed] Order filed  
Concurrently herewith]*

Date: To be determined by the Court  
Time: 10:00 a.m.  
Dept.: 9

Complaint Filed: 09/24/2020  
First Am. Complaint Filed: 10/07/2020

**ORIGINAL**

1                   **TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2                   PLEASE TAKE NOTICE that pursuant to Cal. Civ. Proc. Code §§ 2025.450 and 2031.310, on a  
3 date to be determined by the Court, in Department 9 of the above-entitled Court, located at the Spring  
4 Street Courthouse, 312 North Spring Street, Los Angeles, CA 90012, Plaintiffs Keshara Shaw, Alma Rosa  
5 Farias De Solano, Josue Ricardo Gastelum-Campista, Maritza Gonzalez, Ronnie Heard, Jr., Deyanira  
6 Hooper, Judith Larson, Vicenta Martinez, and Akela Wroten, Jr. will, and hereby do, move for an order  
7 to compel Defendant Los Angeles Unified School District and Relief Defendant United Teachers Los  
8 Angeles to affirm their collection efforts, produce proper privilege logs, and produce improperly withheld  
9 internal communications.

10                  This Motion is based on this Notice of Motion, the Memorandum of Points and Authorities,  
11 Separate Statement, and Declaration of Edward Hillenbrand filed concurrently herewith, all records,  
12 documents papers on file herein, and such other argument as may be presented at the time of the hearing  
13 on this matter.

1 DATED: February 25, 2021

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1 **PROOF OF SERVICE**

2 I, La Tonya Fountain, am employed in the County of Los Angeles, State of California. I am over  
3 the age of 18 and not a party to the within action. My business address is 555 South Flower Street, Suite  
4 3700, Los Angeles, California 90071.

5 On February 25, 2021, a copy of the foregoing document was served on the interested parties in this action  
6 as follows:

7  **By CASE ANYWHERE**

8 By causing a true and correct copy of the document(s) to be electronically served by transmission  
9 by use of the Case Anywhere electronic service platform for those parties on the Case Anywhere  
Service, list.

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20 *Attorneys Specially Appearing for Defendants Los Angeles Unified School District and Austin*  
21 *Beutner*

*Counsel For United Teachers Los Angeles Relief Defendant*

22 I declare under penalty of perjury that the foregoing is true and correct.

23 Executed on February 25, 2021, at Los Angeles, California.

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25 

26  
27 La Tonya D. Fountain