

1 **MICHAEL A. CONGER, ESQUIRE (State Bar #147882)**
2 **LAW OFFICE OF MICHAEL A. CONGER**
3 16236 San Dieguito Road, Suite 4-14
4 **Mailing:** P.O. Box 9374
5 Rancho Santa Fe, California 92067
6 Telephone: (858) 759-0200
7 Facsimile: (858) 759-1906

8 Attorney for all Plaintiffs, individually,
9 and on behalf of all others similarly situated

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **FOR THE COUNTY OF SAN DIEGO**

12 DONALD R. SHORT, JAMES F. GLEASON,
13 CASEY MEEHAN, MARILYN SHORT, PATTY
14 WESTERVELT, AND DOTTIE YELLE,
15 individually, and on behalf of all others similarly
16 situated,

17 Plaintiffs,

18 v.

19 CC-LA JOLLA, Inc., a Delaware Corporation, CC-
20 LA JOLLA, L.L.C., a Delaware limited liability
21 company, CC-DEVELOPMENT GROUP, INC.,
22 CLASSIC RESIDENCE MANAGEMENT
23 LIMITED PARTNERSHIP, an Illinois Limited
24 Partnership, and DOES 1 to 110, inclusive,

25 Defendants.

CASE NO: GIC877707

Date: March 28, 2008

Time: 10:30 a.m.

Judge: Hon. Yuri Hofmann

Dept: 60

Action Filed: December 29, 2006

Trial Date: September 5, 2008

NOTICE OF CLASS
REPRESENTATIVES' MOTION
FOR PROTECTIVE ORDER
LIMITING DEFENDANTS TO A
REASONABLE NUMBER, LENGTH
AND LOCATION OF
DEPOSITIONS OF ABSENT CLASS
MEMBERS

26 **TO ALL PARTIES AND TO THE COUNSEL OF RECORD FOR EACH PARTY:**

27 **PLEASE TAKE NOTICE** that on March 28, 2008, at 10:30 a.m., or as soon thereafter
28 as the matter may be heard in Department 60 of the above-entitled court, located at 330 West
Broadway, San Diego, California, class representatives Donald R. Short, James F. Gleason,
Casey Meehan, Marilyn Short, and Patty Westervelt, will and hereby do move the Court pursuant
to Code of Civil Procedure sections 2017.020, 2019.030, and 2025.420 and California Rules of
Court, rule 3.768(b) and (d), for an order limiting the number and length of absent class member
depositions.


This motion will be made on the ground that a protective order is necessary to protect the

1 deponents from annoyance, oppression, and undue burden and expense. The Motion will be
2 based upon this Notice, the accompanying Memorandum of Points and Authorities, the
3 declaration of Michael A. Conger, the declaration of James F. Gleason, the documents separately
4 lodged with this Notice, the arguments of counsel, and the records and files in this action,
5 expressly including the briefs, declarations, exhibits and all other documents filed in support of
6 the plaintiffs' motion to certify class action.

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8 Dated: February 1, 2008

LAW OFFICE OF MICHAEL A. CONGER

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10 By:


11 Michael A. Conger
12 Attorney for the Class
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