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MICHAEL BROAD (SBN: 121348)  
Attorney at Law  
166 Santa Clara Avenue  
Oakland, CA 94610  
Telephone: (510) 835-5772  
Facsimile: (510) 835-5773

JAY IAN ABOUDI (SBN: 251984)  
GENERAL COUNSEL  
OAKLAND PORT SERVICES CORPORATION  
11 Burma Road  
Oakland, CA 94607  
Telephone: (510) 719-5583  
Facsimile: (510) 803-4529

Attorneys for Defendant  
OAKLAND PORT SERVICES CORPORATION  
d/b/a AB TRUCKING (erroneously sued as AB  
TRUCKING, INC.)

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF ALAMEDA

LAVON GODFREY and GARY GILBERT, on  
behalf of themselves and all others similarly  
situated,

Plaintiffs,

v.

OAKLAND PORT SERVICES  
CORPORATION d/b/a AB TRUCKING, and  
DOES 1 through 20, inclusive,

Defendants.

**FILED BY FAX**

ALAMEDA COUNTY

January 15, 2010

CLERK OF  
THE SUPERIOR COURT  
By Rosanne Case, Deputy

CASE NUMBER:  
**RG08379099**

CASE NO. RG 08-379099

**NOTICE OF MOTION AND MOTION  
TO COMPEL FURTHER ANSWERS TO  
INTERROGATORIES; AND FOR  
SANCTIONS; MEMORANDUM IN  
SUPPORT THEREOF; AND  
DECLARATION OF JAY ABOUDI**

Hearing Date: February 11, 2010  
Hearing Time: 2:00 p.m.  
Dept: Dept. 20, Judge Freedman  
Action Filed: March 28, 2008  
Trial Date: Not yet assigned  
Reservation No. R - 1027608

**TO EACH PARTY AND TO THE COUNSEL OF RECORD FOR EACH PARTY:**

**YOU ARE HEREBY NOTIFIED THAT on February 11, 2010 at 2:00 p.m., in**  
Department 20 of this Court located at 1221 Oak Street, Oakland, California 94612 will move  
the Court for an order compelling deponents LAVON GODFREY and GARY GILBERT to

1 provide further answers to the interrogatories set forth in the Statement of Interrogatories and  
2 Responses in Dispute filed with this motion.

3 Defendant OAKLAND PORT SERVICES CORPORATION d/b/a AB TRUCKING will  
4 also move the Court for an order that Plaintiffs LAVON GODFREY and GARY GILBERT and  
5 Plaintiffs' law firm WEINBERG, ROGER, & ROSENFELD, A Professional Corporation, pay  
6 the sum of \$3,540.00 as the reasonable costs and attorney fees incurred by Defendant  
7 OAKLAND PORT SERVICES CORPORATION for these proceedings.

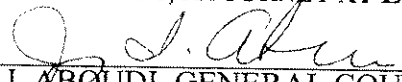
8 This motion is made on the ground that the interrogatories are relevant to the subject  
9 matter of the action, and Plaintiffs' refusal to answer fully is without substantial justification.  
10 This motion is made on the additional ground that Plaintiffs' failure to submit timely responses  
11 in compliance with California Code of Civil Procedure § 2030.290(b).

12 This motion will be based upon this notice, the attached memorandum in support and  
13 declaration, the separate Statement of Interrogatories and Responses in Dispute, and the records  
14 and files in this action.

15

16 Dated: January 15, 2010

**JAY IAN ABOUDI, ATTORNEY AT LAW**



JAY I. ABOUDI, GENERAL COUNSEL  
Attorney for Defendant  
OAKLAND PORT SERVICES  
CORPORATION d/b/a AB TRUCKING

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