

1-2. 21CV03075 Hall, Chantelle v. City of Chico, et al.

EVENT: (1) Plaintiff's Motion to Compel Further Interrogatory Responses from the City of Chico

(2) Defendant Villa Rita Partners, LP's Motion for Determination of Good Faith Settlement

Plaintiff's Motion to Compel Further Interrogatory Responses from the City of Chico

CRC 3.1345

(c) Contents of separate statement A separate statement is a separate document filed and served with the discovery motion that provides all the information necessary to understand each discovery request and all the responses to it that are at issue. The separate statement must be full and complete so that no person is required to review any other document in order to determine the full request and the full response. Material must not be incorporated into the separate statement by reference. The separate statement must include--for each discovery request (e.g., each interrogatory, request for admission, deposition question, or inspection demand) to which a further response, answer, or production is requested--the following:

(1) The text of the request, interrogatory, question, or inspection demand;

(2) The text of each response, answer, or objection, and any further responses or answers;

(3) A statement of the factual and legal reasons for compelling further responses, answers, or production as to **each** matter in dispute;

(4) If necessary, the text of all definitions, instructions, and other matters required to understand each discovery request and the responses to it;

(5) If the response to a particular discovery request is dependent on the response given to another discovery request, or if the reasons a further response to a particular discovery request is deemed necessary are based on the response to some other discovery request, the other request and the response to it must be set forth; and

(6) If the pleadings, other documents in the file, or other items of discovery are relevant to the motion, the party relying on them must summarize each relevant document.

[Emphasis Added]

Plaintiff's counsel's declaration attaches as Exhibit A, a document captioned "Separate Statement in Support of Motion to Compel Further Interrogatory Responses from the City of Chico". The document only lists each interrogatory followed by the response. Nowhere in the document is there an analysis corresponding to each discovery request which explains why the response to the specific discovery request is inadequate.

Thus, the "separate statement" fails to comply with subdivision (c)(3). Because it fails to comply with subdivision (c)(3), it is not really a separate statement because the Court cannot simply rely on the document to adjudicate the particular discovery request. As the rule notes, the concept is that "no person is required to review any other document." Rather, because the document does not comply with subdivision (c)(3), we are forced to refer to the points and authorities.

The problem with that is, the points and authorities make general statements that are not tailored to specific requests. For example, the points and authorities state "When the city did respond with actual facts, their evidence was not tailored to the particular defense, rehashing the same statement over and over and over again."

It is untenable for the Court to review each discovery request and guess as to how or why the evidence was not tailored to the particular defense.

The motion is continued to July 29, 2026 for Plaintiff to file a separate statement which complies with CRC 3.1345(c). Plaintiff shall file and serve the separate statement no later than June 30, 2026. Defendant shall file an opposition no later than July 14.

Defendant Villa Rita Partners, LP's Motion for Determination of Good Faith Settlement

The motion is GRANTED. Defendant Villa Rita shall prepare and submit a form of order within two weeks.

3. 22CV01196 Renteria Graciano, Agustina v. Hignell, Incorporated

EVENT: Status Conference

Per CCP 384(b), counsel is directed to prepare an amended judgment which directs payment of the \$146,412.24 in unclaimed funds to the Cy Pres recipient Legal Aid at Work.

4. **23CV00528 Rosinski, Melinda et al v. Piercey, Matthew, et al.**

EVENT: Plaintiffs' Motion to Compel Requests for Production to Rodney Piercey Set No. 1 and Request for Sanctions

This discovery motion, along with all pending and future discovery motions is referred to the selected discovery referee, Douglas Robbins, Esq.

5. **25CV00962 Kelly Boslow, Successor in Interest to Jo M Pulos et al v. Golden Roseleaf LLC et al.**

EVENT: Motion for Leave to Amend Complaint

Motion for Leave to Amend Complaint is GRANTED.

The Court notes that the proof of service fails to comply with CCP 1013a in that it does not state who was served and at what address. However, because Defendants have yet to appear, no notice is required, see CCP 1014.

Also, in the event future motions to amend are filed, such motions should comply with the requirements of CRC 3.1324.

The Court will sign the proposed order.

6-7. 25CV04127 Wells Fargo Bank, N.A. v. Dashler, Cassandra O

EVENT: (1) Plaintiff's Motion for Judgment on the Pleadings

(2) Case Management Conference

Plaintiff's Motion for Judgment on the Pleadings is GRANTED. The Court will sign the proposed order and judgment. The Case Management Conference is vacated.

8. 25CV04208 Curtis-Brown, Stephanie v. Marple, Larry et al

EVENT: Plaintiff's Motion for Deemed Admissions and Request for Sanctions (Continued from 6/3/26)

Plaintiff's Motion for Deemed Admissions is moot in light of the responses provided while this motion was pending. The Court finds the responses were untimely and as a result all objections are waived.

Regarding sanctions, Defendant contends that a simple phone call would have eliminated the need to file this motion. Technically, no meet and confer is required when no responses have been provided, as was the case here. However, as we have seen in the past, if a party decides to file a motion without meeting and conferring, and it turns out there was a legitimate reason for the delayed response, we have in the past denied sanctions in appropriate circumstances.

These circumstances are more nuanced because Defendant had already received a generous 30 day extension to respond to the discovery. Ms. Savage's position that they could have simply picked up the phone and called is undermined by the fact she had already received a 30 day extension.

Nevertheless, the request for sanctions is denied. While the Court finds Plaintiff was justified in filing this motion (counsel had previously provided a 30 day extension), the unexpected medical issues encountered by defense counsel leading up to and after the responsive deadline warrant the denial of sanctions.

9. 25CV05125 Duckett, Heather v. Foremost Insurance Company et al.

EVENT: Demurrer to Plaintiff Heather Duckett's Complaint

In light of the filing of the First Amended Complaint, the motion is moot.

10. 26CV00516 Howard, Sierra v. Van Blaricom, Gloria Jean et al.

EVENT: Defendants Paradise Unified School District and Gloria Jean Van Blaricom's Motion to Strike

In light of the First Amended Complaint, Defendants Paradise Unified School District and Gloria Jean Van Blaricom's Motion to Strike is moot.

11. 26CV01122 Hhays, Incorporated v. Pello, Nick

EVENT: Petition for Release of Property from Lien (Continued from 4/29/26)

Petition for Release of Property from Lien is GRANTED. The Court will sign the proposed order.

12. 26CV01297 Hongyan Revocable Intervivos Trust v. Pello, Nick

EVENT: Petition for Release of Property from Lien (Continued from 4/29/26)

Petition for Release of Property from Lien is GRANTED. The Court will sign the proposed order.

13. 26CV01185 Steele-Pfleger, Amanda v. Brower's 25Hr Towing et al

EVENT: Order to Show Cause Re: Preliminary Injunction; Order Shortening Time; Writ of Possession (Continued from April 29, 2026)

At the previous April 29, 2026 hearing the Court continued the OSC re: Preliminary Injunction and kept the TRO in place so that Plaintiff could serve the TRO, OSC re: Preliminary Injunction, Ex Parte application and Summons and Complaint in compliance with the Code of Civil Procedure. Service is required both under CRC 3.1150 and CCP 527 which prohibits the granting of a preliminary injunction without notice to the other party.

As of this writing, the Court has not received a proof of service. Consequently, the OSC re: preliminary injunction is denied without prejudice and the TRO is dissolved. Regarding the writ of possession, it is also denied on the notice issue. It is also denied for the reason that a writ of possession must use the mandatory Judicial Council forms CD-100 and CD-120.

The Court will prepare the order.

14. 26CV02088 In re the Petition of R B

EVENT: Petition for Approval for Transfer of Structured Settlement Payment Rights

The hearing is continued to July 22, 2026 at 9:00am for Petitioner to submit an unredacted petition and to file a proof of service as required by Ins. Code 10139.5(f)(2)(l).