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13 **GREGORIO CONTRERAS SANCHEZ**

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

15 **FOR THE COUNTY OF SAN MATEO**

16 GREGORIO CONTRERAS SANCHEZ,

17 Plaintiff,

18 vs.

19 FIDEL CONTRERAS SANCHEZ AND
20 GUADALUPE CONTRERAS SANCHEZ, and
21 DOES 1-20, inclusive,

22 Defendants.

23 AND ALL RELATED CROSS ACTIONS
24 AND CONSOLIDATED ACTION

Case No.: 23-CIV-00683

The Hon. Nancy L. Fineman

**OPPOSITION OF PLAINTIFF
GREGORIO CONTRERAS SANCHEZ
TO THE DEFENDANTS’ MOTION TO
COMPEL FURTHER RESPONSES TO
REQUESTS FOR ADMISSIONS; AND
REQUEST THAT THE COURT ISSUE
AN IMMEDIATE PROTECTIVE
ORDER AGAINST DEFENDANTS’
ATTORNEYS ANDREW WATTERS
AND JERAMY STONE AND THAT
SIGNIFICANT SANCTIONS BE
IMPOSED ON DEFENDANTS’
ATTORNEYS ANDREW WATTERS
AND JERAMY STONE FOR THEIR
MISCONDUCT AND ABUSE**

[Filed Concurrently with Declaration of
Ligia M. Parmenter; Declaration of Gregorio
Contreras; and Request for Judicial Notice]

Date: June 25, 2024

Time: 2:00 p.m.

Dept.: 4

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I. INTRODUCTION AND FACTUAL BACKGROUND

A. Plaintiff Diligently and Timely Responded to The Written Discovery Requests and Diligently Complied With The Directives of The Honorable Commissioner Michael L. Mau Through The IDC Process.

As documented in detail below, Defendants’ statements that Plaintiff has refused to meet and confer and engage in the IDC process, is patently false. (Parmenter Decl., ¶ 3.)

Here, the uncontroverted facts are that Plaintiff, timely and diligently responded in good faith to all of the Defendants’ written discovery requests and rightfully preserved each of his meritorious objections. (Parmenter Decl., ¶ 4.) Plaintiff also followed with great diligence each and every one of the directives of the Honorable Commissioner Michael L. Mau. with regards to the purported deficiencies in the responses and provided amended responses in full compliance with Commissioner Maa’s directions. (Parmenter Decl., ¶ 5.) It is the Defendants’ Attorneys who refuse to obey orders or respect our judicial system.

What is more, as the Court noted in its Order of October 18, 2023, less specificity is required when the defendant “[M]ust necessarily possess full information concerning the facts of the controversy.” (Tenet Healthsystem Desert, Inc. v. Blue Cross of California (2016) 245 Cal.App.4th 821, 838; Committee On Children's Television, Inc. v. General Foods Corp. (1983) 35 Cal.3d 197, 217.)”

Even further, Defendants’ Guadalupe Contreras and Fidel Contreras burglarized the Plaintiff’s home, and stole all of his documents related to the Plaintiff’s mobile home. (See Declaration of Gregorio Contreras.) It was Plaintiff’s intention to bring a Motion for the Spoilation of Evidence, however, due to the enormous and extremely costly work load imposed by the Defendants’ actions in this case, resources have instead been invested in attempting to bring this litigation to an end.

B. Defendants’ Attorneys Andrew Watters and Jeramy Stone Have Become Obsessed in Harming, Ruining, Threatening And “Shaming” - Plaintiff’s Counsel

Defendants’ instant motion is a further pretextual attempt to harass and intimidate Plaintiff and his counsel, and part of an abusive pattern of behavior by Defendants’ Attorneys Andrew Watters and Jeramy Stone (hereinafter collectively “Defendants’ Attorneys”), that violates the obligations of professionalism and civility, the California Code of Civil

1 Procedure, the California Rules of Professional Conduct, the Business and Professions Code
2 and encompasses Unfair Business Practices. (Parmenter Decl., ¶ 6.)

3 As further documented below – Defendants’ Attorneys have become obsessed with
4 harming, “shaming” and attempting to ruin the Plaintiff’s counsel. (Parmenter Decl., ¶ 7.)
5 Based on information and belief, this is because she is a woman of Hispanic descent and the
6 Defendants’ Attorneys believe they can bully her with no repercussions. (Parmenter Decl., ¶

7 8.)
8 Plaintiff’s counsel, Ligia Parmenter, does not in any manner know Defendants’
9 Attorneys. (Parmenter Decl., ¶ 9.) She never met them before, does not want to socialize with
10 them or be around them in any capacity; and other than the exchange that has occurred in this
11 case through her work as an attorney, she has never had any dealings of any nature
12 whatsoever with Defendants’ Attorneys which in any manner warrants the “shaming”.
13 harassment and threats she has received from Defendants’ Attorneys. (Id.)

14 **C. The Court Should Take Defendants’ Attorneys’ Egregious Misconduct**
15 **Seriously As This Misconduct Has Spilled Over Into “Shaming” And Deriding**
16 **The Court And The Honorable Chinhayi C. Cadet In A Heinous Manner.**

17 To maintain the fair and independent administration of justice, lawyers
18 (in this case Plaintiff’s counsel Ligia M. Parmenter) should defend
19 judges and courts unjustly criticized. Lawyers also are obligated to
20 maintain the respect due to the courts of justice and judicial officers.
21 (See Bus. & Prof. Code, § 6068, subd. (b).)¹ (Parmenter Decl., ¶ 10.)

22 Defendants’ appear to have done a good job of deriding the Plaintiff’s counsel and
23 have prejudiced her before the Court. (Parmenter Decl., ¶ 11.) As soon as the Defendants’
24 Attorneys read this Opposition and Request for a Protective Order, they will scramble to
25 remove their “shaming” postings from the internet. (Parmenter Decl., ¶ 12.) (All postings
26 have been diligently copied from the internet as they appear on Defendants’ Attorneys’ law
27 office website.) (Id.) In addition, Defendants’ Attorneys will again threaten and report the

28 ¹ Plaintiff’s counsel (Ligia Parmenter) learned of this egregious misconduct today and
therefore brings this to the Superior Court of California’s attention for the protection of Judge
Chinhayi C. Cadet. Previously, the Defendants’ Attorneys’ “shaming” website simply stated
that the “shaming” of Judge Chinhayi C. Cadet, would come at a later date. Today, June 11,
2024 – there appeared heinous and degrading comments.

1 Plaintiff's Attorney to the State Bar for her representation of the Plaintiff in this case. (Id.)
2 Plaintiff's counsel has been significantly prejudiced and harmed by the Defendants' Attorneys
3 unlawful actions. (Id.)

4 Respectfully, the Court should be put on notice (as uncovered today June 11, 2024)
5 that no one appears to be safe from the Defendants' Attorneys' ongoing "shaming" attacks as
6 they have also heinously "shamed" and derided in a libelous manner Superior Court of
7 California County of San Mateo Superior Court **Judge Chinhayi C. Cadet**. (Parmenter
8 Decl., ¶ 13.) As such, this is not a he said – she said – matter as may be believed by the Court.
9 (Id.)

10 It is respectfully requested that the Court move to take protective action against
11 Defendants' Attorneys **Andrew Watters** and **Jeramy Stone**, as their egregious misconduct has
12 now taken on "shaming" Superior Court of California County of San Mateo Superior Court
13 **Judge Chinhayi C. Cadet**. (Parmenter Decl., ¶ 14.)

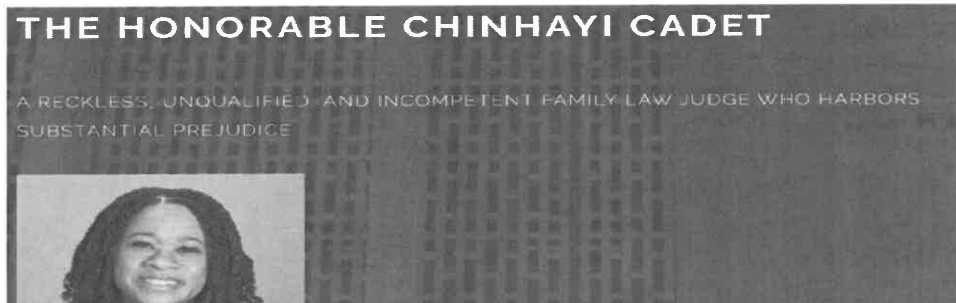
14  **Andrew Watters**
15 <https://www.andrewwatters.com> › hall-of-shame › chinha... ⋮

16 **The Honorable Chinhayi Cadet**

17 Mar 27, 2024 – The Honorable **Chinhayi Cadet**, by Andrew G. **Watters**, Esq. Under ... Seems
18 important when calling out a **judge** in the same area I practice.

19 Plaintiff's Request for Judicial Notice ("RJN"), Exhibit A.

20 Indeed, a Google search of the Honorable Chinhayi C. Cadet yields Defendants'
21 Attorneys' "Hall of Shame", public/internet "shaming" about the Honorable Judge as second
22 only to the San Mateo Superior Court's own website. (Parmenter Decl., ¶ 16.) Defendants'
23 Attorneys' "shaming" states, inter alia, as follows:



27 RJN, Exhibit B.
28

1 Quote from above: “A RECKLESS, UNQUALIFIED, AND INCOMPETENT FAMILY LAW
2 JUDGE WHO HARBORS SUBSTANTIAL PREJUDICE”. (Parmenter Decl., ¶ 18.)
3 <https://www.andrewwatters.com/hall-of-shame/chinhayi-cadet/> [Date of screen shot 6-11-
4 2024] Please see Request for Judicial Notice for complete “shaming” as per Defendants’
Attorneys. (Id.)

5 Defendants’ Attorneys’ public shaming of the Honorable Chinhayi C. Cadet, then goes
6 on to boast as follows: “The “under construction” page that preceded this writeup received
7 more views than the rest of the Hall of Shame combined. I get occasional calls and emails
8 from other attorneys about Judge Cadet, most of whom are shocked that this person is a judge.
9 I have more to say, but this is a start.” RJN, Exhibit B. (Parmenter Decl., ¶ 19.)

10 Clearly, unless the Court issues a protective order and sanctions against the
11 Defendants’ Attorneys, more libelous and abusive public “shaming” will transpire.
12 (Parmenter Decl., ¶ 20.)

13 **D. Defendants’ Attorneys’ Unlawful and Egregious Misconduct Has Irreparably**
14 **Harmed Plaintiff’s Counsel Ligia Parmenter – a Veteran Attorney of Over 30**
15 **Years, and She Has Sustained Serious Harm and Damages In Being Branded A**
16 **“Crazed Attorney” By The Defendants’ Attorneys’ Andrew Watters And Jeremy**
17 **Stone. Potential Clients, Clients, Attorneys, Opposing Counsel, And Judges Read**
18 **About This False, Libelous, Slanderous and Damaging False Statement Whenever**
19 **a Search Is Conducted of Plaintiff’s Counsel.**

20 Days before the foregoing, on March 7, 2024, Defendants’ Attorneys caused the
21 following abusive false statement of Plaintiff’s counsel to be published on the internet.
22 (Parmenter Decl., ¶ 21.) This abusive and false statement appears on the first page of a
23 Google search and is one of the top searches on the first page when the name “Ligia
24 Parmenter” is searched. (Parmenter Decl., ¶ 22.)

25  Andrew Watters
<https://www.andrewwatters.com/hall-of-shame/ligia-p...>

26 **Ligia Parmenter, Esq.**

27 **Mar 7, 2024 – March 7, 2024. Ligia Parmenter, Esq. I finally have had enough of this crazy**
28 **attorney. Coming soon. Back to Hall of Shame.**

RJN, Exhibit C.

1 When clicking on Defendants’ Attorneys’ libelous and false statement “crazed
2 attorney” regarding the Plaintiff’s counsel the following was placed there by Defendants’
3 Attorneys: (Parmenter Decl., ¶ 24.)

4 **Parmenter Law Offices**
Attorneys at Law

1-415-738-7901

5 home areas of practice about attorneys why we’re different en español contact

6
7 At our office we care about getting you the **results you deserve**. We are consumer
8 protection advocates. We take pride in the reputation we have earned by **doing the**
9 **right thing for our clients**.

10 We take pride in the fact that **ethics and honesty mean everything to us**. No
11 matter what your particular legal problem is, we are here to do what is right for you
12 and provide **smart, honest guidance** about a full range of legal matters.



13 RJN, Exhibit D.

14 This information is placed there to cause further harm to the Plaintiff’s counsel and
15 have creepy persons perhaps learn of the Plaintiff’s counsel to attempt to harm her.

16 (Parmenter Decl., ¶ 25.)

17 It is requested that the Court issue an immediate protective order and order the
18 Defendants’ Attorneys to immediately remove these libelous and dangerous postings.

19 (Parmenter Decl., ¶ 26.)

20 **E. Constant Threats from Defenants’ Attorneys To Report Plaintiff’s Counsel To**
21 **The State Bar If She Does Not Do What They Demand of Her**

22 As to the Plaintiff’s counsel, Ligia M. Parmenter, Defendants’ Attorneys have sent two
23 letters, one on August 3, 2023, (Parmenter Decl., Exhibit A) and another on August 7, 2023
24 (Parmenter Decl., Exhibit B), threatening to report her to the State Bar of California if she did
25 not withdraw the Plaintiff’s meritorious Motion for Reconsideration Re: Order Granting a Lis
26 Pendens, after Defendants’ Attorneys filed a Motion to Expunge a Lis Pendens (which was
27 non-existent). (Parmenter Decl., ¶ 27.) In response to the Plaintiff’s Motion for
28 Reconsideration, the Court ruled on November 6, 2023, that: **“The Court has determined
that its prior order, granting defendants’ Motion to Expunge, was in error”**. RJN,
Exhibit E. (Parmenter Decl., ¶ 30.)

The filing of the Motion for Reconsideration, appeared to cause Defendants’ Attorneys
to become unhinged. (Parmenter Decl., ¶ 32.)

1 After receiving the two (2) letters threatening to report her to the State Bar, on
2 September 19, 2023, (Parmenter Decl, Exhibits A and B) Defendants' Attorneys sent the
3 following additional threat to Plaintiff's counsel Ligia M. Parmenter:

4 Dear Ms. Parmenter,

5 As you know, Jeramy and I represent the Defendant in this action.

6 We read your latest filing (reply on motion for reconsideration), and
7 for this and other reasons we have serious concerns about your mental
8 state. Your false statements of fact and your extensive inclusion of
9 absolutely irrelevant matter, such as my lawsuit against Federal
10 prisoner Mahsa Parviz and your claims about how I supposedly practice
11 law, indicate that something is seriously wrong with you.

12 Mahsa is a nine-time felon who is in prison and is on a harassing
13 crusade against me. I have every right to shame her online in a web
14 page that is 100% true and 100% fair to her. And now I am providing you
15 notice that I am likely going to shame you as well for your
16 lunatic-level behavior.

17 My Hall of Shame web page about Zheng Liu states that he is "perhaps"
18 the most insane, unfit licensed attorney in California. You are rapidly
19 approaching that level, and I hope you will reconsider while there is
20 still time to avoid having my potential Hall of Shame web page about you
21 being higher-ranked on Google than your own website.

22 Best,

23 Andrew Watters

24 (Parmenter Decl., Exhibit C.) (Parmenter Decl., ¶ 33.)

25 On November 6, 2023, the Court entered the following order regarding the foregoing
26 threat to the Plaintiff's counsel: (Parmenter Decl., ¶ 35.)

27 Further, counsel are admonished to adhere to the State Bar's Rules of Professional Conduct, and
28 are advised to reference the Civility Toolbox available at:

https://www.calbar.ca.gov/Portals/0/documents/ethics/Civility/Atty-Civility-Guide-Revised_Sept-2014.pdf.

Defense counsel's statements to Plaintiff's counsel that "we have serious concerns about your
mental state," that "something is seriously wrong with you," and that "I am likely going to shame you as
well for your lunatic-level behavior," are not acceptable professional discourse, and continued
communication of this type will not be tolerated. (Parmenter Decl. iso Supp. Reply iso Mot. for
Reconsideration, Exh. A.)

RJN, Exhibit E.

1 As set forth above, Defendants’ Attorneys chose to blatantly disregard the Court’s
2 admonishment and Order to them. (RJN, Exhibit E) (Parmenter Decl., ¶ 36.) Instead, they
3 chose to weaponize the litigation process as they did with the Motion for Reconsideration
4 regarding the Lis Pendens (and the instant Motions to Compel Further Responses to
5 Discovery) in the hopes that the Plaintiff’s counsel would have to drop the case of the
6 Plaintiff due to the enormous amounts of hours that must be devoted to the Defendants’
7 Attorneys’ shenanigans. (Id.) When Plaintiff’s counsel continued to work on behalf of the
8 Plaintiff, Defendants ‘Attorneys took it upon themselves to disobey the Court’s Order of
9 November 6, 2023 (see above), in order to bring further harm to Plaintiff’s counsel.
(Parmenter Decl., ¶ 37.)

10 On March 7, 2024, Defendants’ Attorneys went ahead and published the false
11 statement that the Plaintiff’s counsel is “crazed”. (RJN, Exhibits C and D) **Which is patently**
12 **false**, and brings harm, significant damages, shame and mortification to the Plaintiff’s
13 counsel. (Parmenter Decl., ¶ 38.)

14 What is more, Plaintiff’s counsel is extremely afraid of contacting the Defendant’s
15 Attorneys for fear they will act in an even further malicious manner. (Parmenter Decl., ¶ 39.)
16 Plaintiff has lost many clients from this false statement and in addition, other counsel read
17 this false statement and begin to treat the Plaintiff’s counsel in a derogatory manner. (Id.)
18 This is extremely unfair and the Defendants’ Attorneys’ need to be severely sanctioned so this
does not occur again. (Id.)

19 **F. Defendants’ Attorneys’ Misconduct and Maliciousness May Lead To Physical**
20 **Harm as Stated On Defendants’ Attorneys’ Law Office Website – A Protective**
21 **Order Is Necessary Here To Protect Innocent Parties From Further Harm.**

22 Defendants’ Attorneys’ law office website also make reference to their being ‘Polite
23 Gunfighters”. (Parmenter Decl., ¶ 40.) It is not known what this means, but there is no place
24 for the word “gunfighter” in a law office website, especially in depicting an attorney. As
25 attorneys, we fairly and justly try to resolve matters pursuant to the laws. (Id.) We also do
26 not engage in horrific violence or justify any form of violence even if according to the warped
27 mentality of the Defendants’ Attorneys it is “polite”. (Id.) As set forth below, Defendants’
28 Attorneys law office website identifies them as follows:

ANDREW G. WATTERS

THE POLITE GUNFIGHTER®

RJN, Ex. F

Coming from persons that do not respect our judicial system, this is an extremely frightening allegation. (Parmenter Decl., ¶ 42.) Defendants' Attorneys that have demonstrated and put into full force their hatred and desire to harm Plaintiff's counsel. (Id.)

II. PLAINTIFF DILIGENTLY AND TIMELY RESPONDED TO THE WRITTEN DISCOVERY REQUESTS AND DILIGENTLY COMPLIED WITH THE DIRECTIVES OF THE HONORABLE COMMISSIONER MICHAEL L. MAU THROUGH THE IDC PROCESS.

A. Plaintiff Diligently and Timely Responded To The Defendants' Discovery Requests – Preserving All Of His Meritorious Objections

Plaintiff in this matter diligently and timely provided verified responses to each and every one of the Defendants' written discovery requests. Plaintiff diligently and good faith responded without any requests for an extension of time, and further preserved his objections to the written discovery requests. (Parmenter Decl., ¶ 43.)

On August 8, 2023, Defendants served upon Plaintiff Gregorio Contreras: Form Interrogatories, Set One; Request for Admissions, Set One; Request for Production of Documents, Set One; and Special Interrogatories, Set One. This service was done by email. (Parmenter Decl., ¶ 44.)

Pursuant to Code, on September 10, 2023, Plaintiff **diligently** and **timely** served his verified responses to Defendants' Form Interrogatories, Set One; Request for Admissions, Set One; Request for Production of Documents, Set One; and Special Interrogatories, Set One. (Parmenter Decl., ¶ 45.)

On December 19, 2023, Defendants' served Plaintiff Gregorio Contreras with Form Interrogatories, Set Two; and Request for Admissions, Set Two. This service was done by email. (Parmenter Decl., ¶ 46.)

Pursuant to Code, on January 20, 2024, Plaintiff **diligently** and **timely** served his verified responses to Defendants' Form Interrogatories, Set Two; and Request for Admissions, Set Two. (Parmenter Decl., ¶ 47.)

After receipt of the Plaintiff's responses, if there was a concern, Defendants failed to property meet and confer. As set forth above, on September 10, 2023, Plaintiff timely

1 responded to the Defendants’ written discovery requests in a timely manner and provided
2 verified responses. (Parmenter Decl., ¶ 48.) A few days thereafter on Wednesday, September
3 20, 2023, Defendants’ Attorney Jeramy Stone emailed a slew of purported meet and confer
4 letters to Plaintiff’s counsel demanding that the Plaintiff change his verified responses to the
5 Defendants’ written discovery requests by the deadline of Monday, September 25, 2023.
6 (Parmenter Decl., ¶ 49.). Friday, September 22, 2023 was a court holiday, thereby providing
7 the Plaintiff with **48 hours to respond to Defendants’ slew of demands**. As set forth above,
8 this was done, as above described, as part of the Defendants continued and very alarming
9 manner of harassing the Plaintiff and his counsel. (Parmenter Decl., ¶ 50.) In this manner,
10 Defendants’ Attorneys’ could set up a situation whereby it appears that there has been a
11 failure to “meet and confer” as done by the Defendants’ Attorneys’ herein. (Parmenter Decl.,
12 ¶ 51.) This prejudices the Plaintiff and her counsel and provides the Defendants’ Attorneys’
13 with ammunition to “shame” the Plaintiff’s counsel on their “Hall of Shame” law office
14 website. (Parmenter Decl., ¶ 52.)

15 On November 18, 2023, Plaintiff diligently submitted his IDC formal statement to the
16 Court for review. Defendants’ Attorneys’ had previously submitted each of their concerns.
17 (Parmenter Decl., ¶ 53.)

18 On January 3, 2024, the Honorable Michael L. Mau held the first of the IDCs.
19 Defendants’ Attorney Jeramy Stone had every opportunity to enunciate his purported
20 concerns. The Honorable Michael L. Mau issued directives for the Plaintiff to follow in order
21 to provide amended responses. (Parmenter Decl., ¶ 54.)

- 22 1. Plaintiff will amend responses to FI No.'s 2.3, 2.4, 2.6, 9.2, 12.1-12.7, 13.1-13.2, 15.1 and 17.1 (for
23 RFA's 1-13, and 16).
- 24 2. Plaintiff will amend responses to SI No.'s 9-14, 21-23 and 31. No.'s 17-19 are withdrawn as disputed.
- 25 3. Plaintiff will amend its responses to the RFP No.'s 1-16's as apparently Plaintiff has an inability to
26 comply with the actual production, and therefore that should be explained per the code.

27 Plaintiff's amendments will be served by 1/31/24. As such, the IDC is continued to 2/20/24 at 3:00 p.m.,
28 with updated IDC briefs (or an email to vacate the IDC) by 2/15/24.

Parmenter Decl., Exhibit D.

Plaintiff diligently addressed Honorable Michael L. Mau’s directions. Amended
verified responses were diligently and timely served. (Parmenter Decl., ¶ 56.)

On February 20, 2024, the Honorable Michael L. Mau held the second of the IDCs.
(Parmenter Decl., ¶ 57.) Defendants’ Attorney Jeramy Stone had every opportunity to further

1 enunciate his purported concerns. (Id.) The Honorable Michael L. Mau issued directives for
2 the Plaintiff to follow in order to provide further responses. (Id.)

3 Defendant's IDC request was continued from 1/3/24. Plaintiff did serve amended responses, but
4 omitted to amend FI No. 15.1. Also for various responses where witness information was provided,
5 further amendments are necessary for those individuals named who are not parties to this case, by
6 providing their actual contact information.

7 Defendant's new IDC request concerned its RFA's (Set Two) and related FI 17.1 (Set Two). FI 17.1 was
8 only answered with objections and needs to be amended substantively.

9 Plaintiff's above amendments will be served by 3/6/24. As such, the IDC is continued to join with the
10 CMC already set for 3/7/24 at 9:00 a.m. for a compliance check.

11 Parmenter Decl., Exhibit E.

12 During this IDC Defendants' Attorney misrepresented that the responses were
13 incorrect and that the Plaintiff had provided no "witnesses" or only a "couple of witnesses"
14 which was false. (Parmenter Decl., ¶ 59.)

15 Plaintiff diligently addressed Honorable Michael L. Mau's directions. Further
16 amended verified responses were diligently and timely served. (Parmenter Decl., ¶ 60.)

17 Plaintiff served the following Amended Responses which addressed each of the
18 Honorable Michael L. Mau's directions.

- 19 ○ Form Interrogatories - (Parmenter Decl., Exhibit F.)
- 20 ○ Request for Admissions - (Parmenter Decl., Exhibit G.)
- 21 ○ Special Interrogatories - (Parmenter Decl., Exhibit H.)

22 On March 7, 2024, Plaintiff diligently appeared for the Case Management Conference.
23 Defendants' Attorney Jeremy Stone launched into a diatribe before the Court claiming that
24 the Plaintiff had failed to provide responses and that all of the Plaintiff's responses to the
25 written discovery requests were "gibberish". (Parmenter Decl., ¶ 62.)

26 It appears that immediately after this, Defendants' Attorneys' then set off on a
27 scorched earth attack on the Plaintiff's counsel. First Defendants' Attorneys caused to be
28 posted on the internet: (Parmenter Decl., ¶ 63.)



Andrew Watters

<https://www.andrewwatters.com> › hall-of-shame › ligia-p... ⋮

Ligia Parmenter, Esq.

Mar 7, 2024 – March 7, 2024. **Ligia Parmenter, Esq.** I finally have had enough of this crazy attorney. Coming soon. Back to Hall of Shame.

RJN, Exhibit C

This was apparently followed by Defendants' Attorneys' contacting Defendant Yadira

1 Acosta’s attorney, and stating who knows what regarding the Case Management Conference
 2 which took place on that day, which set into motion Mr. Gregory Antone, also sending a
 3 flurry of emails threatening to report the Plaintiff’s counsel to the State Bar of California if,
 4 inter alia, she did not dismiss Yadira Acosta from this action.

5 On March 18, 2024, Defendants’ Attorneys’ sent to the Plaintiff the following email –
 6 demanding that the Plaintiff provide amended response to (all) each and everyone of the
 7 above stated written discovery requests that had been diligently responded to by the Plaintiff.
 8 (Parmenter Decl., ¶ 64.)

9 • 23-CIV-00683 Meet and Confer regarding Plaintiff's deficient discovery res



10 • **Jeramy Stone**
 11 From: jeramy@andrewwatters.com
 12 To: L.M.Parmenter, Manny Juarez, Greg Antone
 13 Cc: Andrew G. Watters

14 Ms. Parmenter and Mr. Juarez,

15 Please advise when we can expect Code compliant responses to the
 16 discovery requests sent to your client, Gregorio Contrearras Sanchez. As
 17 you are aware, the IDC expires on March 22. After that date, the IDC is
 18 complete and our client is authorized to file Motions to Compel as to
 19 each discovery request (Requests for Admissions, Requests for
 20 Production, Form Interrogatories, and Special Interrogatories). Please
 21 let us know by COB Friday March 22, 2024 whether you will submit amended
 22 responses to each set. If we do not hear from you, we will file our
 23 motions to compel further responses.

24 Best regards,
 25 Jeramy

26 Parmenter Decl., Exhibit G.

27 **III. ARGUMENT**

28 **A. Defendants’ Instant Motion Must Be Denied – Plaintiff Diligently Complied
 With His Discovery Responses Acted With Substantial Justification**

Defendants’ feigned “unhappiness” with Plaintiffs’ responses neither makes those
 responses improper nor baseless. Plaintiff diligently responded to the discovery requests. Yet
 further, each objection therein has complied with Code of Civil Procedure section 2033.210,
 subd. (a). The party to whom requests for admission have been directed shall respond in
 writing under oath separately to each request; and (b) Each response shall answer the
 substance of the requested admission, or set forth an objection to the particular request.

As noted by this Court in its ruling, October 18, 2023, less specificity is required when

1 the defendant “[M]ust necessarily possess full information concerning the facts of the
2 controversy.” (*Tenet Healthsystem Desert, Inc. v. Blue Cross of California* (2016) 245
3 Cal.App.4th 821, 838; *Committee On Children's Television, Inc. v. General Foods Corp.*
4 (1983) 35 Cal.3d 197, 217.)”

5 Even further, Defendants’ Guadalupe Contreras and Fidel Contreras burglarized the
6 Plaintiff’s home, and stole all of his documents related to the Plaintiff’s mobile home. (See
7 Declaration of Gregorio Contreras.) It was Plaintiff’s intention to bring a Motion for the
8 Spoilation of Evidence, however, due to the enormous and extremely costly work load
9 imposed by the Defendants’ actions in this case, resources have been invested in attempting to
bring this litigation to an end. (See Declaration of Gregorio Contreras.)

10 **B. Defendants’ Instant Motion Must Be Denied Because There Was a Failure To**
11 **Properly Meet And Confer – And Defendants Thereafter Misled The Court Into**
12 **The Fallacy That Plaintiff Did Not Meet And Confer.**

13 As set forth above, less than ten (10) days after serving his responses on September 20,
14 2023, Defendants’ Attorney Jeramy Stone emailed a slew of purported meet and confer letters
15 to Plaintiff’s counsel demanding that the Plaintiff change his verified responses to the
16 Defendants’ written discovery requests by the deadline of Monday, September 25, 2023.
17 Parmenter Decl., ¶ A. Friday, September 22, 2023 was a court holiday, thereby providing the
18 Plaintiff with **48 hours to respond to Defendants’ slew of demands**. Defendants had ample
19 opportunity to meet and confer, however, that was not what was desired – as clearly
delineated above. Defendants’ Attorneys then demanded an IDC.

20 The meet and confer is the central precept to the purposes of the California Discovery
21 Act of 1986, that civil discovery be essentially self-executing. *Zellerino v. Brown* (1991) 235
22 Cal.App.3d 1097, 111. This rule is designed "to encourage the parties to work out their
23 differences informally so as to avoid the necessity for a formal order..." *McElhaney v. Cessna*
24 *Aircraft Co.* (1982) 134 Cal. App. 3d 285, 289.

25 The purpose of a meet and confer is for the parties to “put down their swords” and
26 engage in as is humanly possible good faith discussions concerning discovery issues that are
27 either necessary for trial or can put issues to rest, for parties to revisit their positions, and to
28 avoid unnecessary discovery. “...talk the matter over, compare their views, consult and
deliberate.” *Townsend v. Superior Court* (1981) 61 CA 4th 1434, 1439. This did not happen in

1 this case. As seen afore, it is clear that Defendants never had any intention of meeting and
2 conferring by virtue of their slew of meet and confer letters with only **48 hours** to respond.
3 Especially in light of the significant amount of time that the Defendants’ had to meet and
4 confer. This is a bad faith approach and demonstrates Defendants were only going through
5 the motions with the intent to file these motions to compel from the outset.

6 On these grounds alone the Court should deny Defendants’ instant motion and their
7 request for monetary sanctions. The approach for bringing this motion is readily transparent.

8 **C. Plaintiff Acted with Substantial Justification and No Monetary Sanctions Are**
9 **Warranted Against The Plaintiff or His Counsel – It Would Be An Injustice**

10 Section 2030.300, subd. (d), states “the court shall impose a monetary sanction ...
11 against any party. person, or attorney who unsuccessfully makes [or opposes] a motion to
12 compel compliance with a demand...” Subdivision (d) also states “unless it finds that the one
13 subject to the sanction acted with **substantial justification** or that **other circumstances** make
14 the imposition of the sanction unjust. Here, Plaintiff diligently followed each of the
15 directives of the IDC process. Only to have the Defendants’ fire off an email that the Plaintiff
16 amend all of their responses to all of the written discovery request

17 Yet further, Defendants filed several motions to compel further responses to discovery
18 against the Plaintiff. Each one demands that Plaintiff, an impoverished person, pay them
19 several thousands of dollars for each of their three motions. Instead of consolidating all three
20 (3) motions into one pleading with one hearing date, requiring one appearance of Plaintiff’s
21 counsel, Defendants’ spreads their motions out over the course of two weeks forcing two
22 separate appearances. Plaintiff believes Plaintiff is simply waging a war of attrition on
23 Plaintiff by cutting and pasting the same motion and setting successive and numerous
24 discovery motions in successive weeks. **This is a misuse of the discovery process.** Further,
25 when Plaintiff requested that the three motions be consolidated into the date of July 2, 2024,
26 because her beloved dog is dying and she needs to take care of him, Defendants’ Attorneys’
27 flatly refused.

28 **D. The Court Should Impose Sanctions Against Defendants’ and Their Counsel**
Andrew Watters And Jeramy Stone For Their Abuse Of The Discovery Act

Under the code, this Court is within its discretion to impose monetary sanctions
against Defendants and / or Defendants’ Attorneys’ Andrew Watters and Jeramy Stone. There

1 is no substantial justification for bringing this motion, and the other two motions to compel.

2 //

3 **IV. WITH REGARDS TO THE DEFENDANTS' ATTORNEYS ANDREW WATERS**
4 **AND JERAMY STONE, THE COURT SHOULD GRANT A PROTECTIVE ORDER**
5 **AGAINST THEM AND IMPOSE SIGNIFICANT SANCTIONS JOINTLY AND**
6 **SEVERALLY AGAINST DEFENANTS, AND DEFENANTS' ATTORNEYS.**

7 It is clear, that the Defendants' Attorneys have violated a Court Order admonishing
8 them with precisely their improper conduct in falsely placing on the internet that Plaintiff's
9 counsel - Ligia Melendez is 'crazed.'" Defendants' Attorneys' malicious actions which, inter
10 alia, violate their obligations of professionalism and civility, the California Code of Civil
11 Procedure, the California Rules of Professional Conduct, the Business and Professions Code
12 and encompasses Unfair Business Practices, should not continue to go unchecked as they have
13 been allowed. Innocent persons are being egregiously harmed, including the Plaintiff's
14 counsel herein and the above referenced Superior Court Judge who has been heinously and
15 falsely accused. This unlawful behavior has a severe impact on the integrity of the judicial
16 process and should not be tolerated.

17 For over a decade, Defendants' Attorney Andrew Watters has been no stranger to
18 reprimands regarding his conduct from the judiciary. It appears Defendants' Attorneys may
19 be attempting to *commit the same type of litigation tactics* that were used by Andrew Watters
20 in the Court of Appeal case of - *In re Marriage of Davenport* (2011) 194 Cal.App.4th 1507,
21 The main problem however, as it relates here, is that Plaintiff in this action is not a wealthy
22 person, as the parties in *Davenport*, with significant amount of money to pay attorney fees
23 and sanctions.

24 Plaintiff respectfully asks the Court to also consider the chilling effect that such
25 conduct has on indigent litigants, such as the Plaintiff, and Plaintiff's counsel, Ligia
26 Parmenter, who are forced to choose between: 1) taking the risk of bringing the egregious
27 misconduct to the attention of others (including the court) and most likely incurring further
28 egregious misconduct against them; or 2) Plaintiff having to walk away from his meritorious
claims regarding his mobile home where he has lived for over a decade, in order to avoid the
risk of having the Defendants' Attorneys' unhinged misconduct directed at them. The mere
thought that a litigant such as the Plaintiff and his counsel must endure Defendants'
Attorneys' misconduct is enough to create fear and anxiety that drives low-income people like

1 the Plaintiff out of the judicial system.

2 The Court has broad discretion to sanction Defendants’ Attorneys’ and issue a protective
3 order. Code of Civil Procedure, section 128 provides that the Court has “the power to . . . control
4 in furtherance of justice, the conduct . . . of all persons in any manner connected with a judicial
5 proceeding before it, in *every manner pertaining thereto*.” Code Civ. Proc. § 128(a)(5). This
6 power includes the power to regulate counsel, including through disqualification as necessary. *In*
7 *re Complex Asbestos Litig.* (1991) 232 Cal. App.3d 572, 585 (“[a] trial court’s authority to
8 disqualify an attorney derives from the power inherent in every court”).

8 **V. CONCLUSION**

9 For the reasons set forth above, Plaintiff urges the Court to deny the Defendants’
10 instant motion to compel and deny Defendants demand for sanctions against the Plaintiff and
11 his counsel. Plaintiff also requests that the Court issue a protective order and also severely
12 sanction the Defendants’ Attorneys for their abusive, and harmful misconduct as documented
13 herein.

14 Dated this 11th day of June 2024.

Respectfully submitted,

PARMENTER LAW OFFICES

17 By:



18 L.M. Parmenter
19 Attorneys for Plaintiff
20 **GREGORIO CONTRERAS SANCHEZ**

PROOF OF SERVICE

I, L.M. PARMENTER, am not a party to this action, I am over 18 years of age and am the attorney for the **Plaintiff GREGORIO CONTRERAS SANCHEZ** herein. My business address is Parmenter Law Offices, 501 ‘B’ Street, Ste. 200, San Rafael, CA 94901. I declare under penalty of perjury that on the below-indicated date, I served the foregoing document(s):

OPPOSITION OF PLAINTIFF GREGORIO CONTRERAS SANCHEZ TO THE DEFENDANTS’ MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSIONS; AND REQUEST THAT THE COURT ISSUE AN IMMEDIATE PROTECTIVE ORDER AGAINST DEFENDANTS’ ATTORNEYS ANDREW WATTERS AND JERAMY STONE AND THAT SIGNIFICANT SANCTIONS BE IMPOSED ON DEFENDANTS’ ATTORNEYS ANDREW WATTERS AND JERAMY STONE FOR THEIR MISCONDUCT AND ABUSE

on the parties to this action by placing a true copy thereof in a sealed envelope or package addressed to the person(s) at the address(es) as set forth below and caused said envelope or package to be served in the following manner:

Mr. Andrew Watters, Esquire
Mr. Jeramy Stone, Esquire
555 Twin Dolphin Drive, Ste, 135
Redwood City, CA 94065
(415) 261-8527
ANDREW@ANDREWWATTERS.COM
JERAMY@ANDREWWATTERS.COM
Attorneys for Defendants
Fidel Contreras Sanchez and Guadalupe
Contreras Sanchez

Mr. Gregory J. Antone, Esquire
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Post Office Box 3739
Half Moon Bay, CA 94019-3739
650.619.6043 Fax: 650.284.2196
GREGORYGJALAW@AOL.COM
Attorney for Defendant Yadira Acosta

Mr. Darryl D. Yorkey, Esquire
McLaughlin Sanchez LLP
605 Market Street, Suite 300 San Francisco, CA 94105
DARRYL@MSLLP.LAW
Attorney for Unlawful Detainer Action.

(By Electronic Mail) By causing One Legal to effect e-service at the time the subject document was submitted for filing with the Court using the email address for each recipient that is on file with One Legal for each party served, as per the “Order Receipt” from One Legal.

Executed in San Rafael, California on **June 11, 2024**.



L.M. Parmenter