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Attorneys for Cross-Defendant Joshua Abel dba Abel Law Offices

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

JOSHUA ABEL dba ABEL LAW OFFICES,

Plaintiff,

vs.

JEFFREY J. CIACHURSKI, CAPTIVA VERDE
INDUSTRIES, LTD, CAPTIVA VERDE
FARMING CORP., GREENBRIAR CAPITAL
CORP., AND DOES 1-50, INCLUSIVE

Defendants,

CASE NO.: 30-2016-00841335

**CROSS DEFENDANT’S NOTICE OF
DEMURRER AND DEMURRER TO
CROSS-COMPLAINANTS’ SECOND
AMENDED CROSS-COMPLAINT;
REQUEST FOR CCP SECTION 128.5
MONETARY SANCTIONS IN THE
AMOUNT OF \$11,390 AGAINST ANGELO
& WHITE AND ALL CROSS-
COMPLAINANTS**

[FILED CONCURRENTLY WITH MEMORANDUM OF POINTS
AND AUTHORITIES ISO DEMURRER TO SECOND AMENDED
CROSS-COMPLAINT; REQUEST FOR JUDICIAL NOTICE;
DECLARATION OF BRUCE D. ABEL IN SUPPORT THEREOF;
DEMAND TO LODGE ORIGINAL TRANSCRIPT; PROPOSED
ORDER]

Date: September 26, 2016
Time: 2:00 p.m.
Dept: C17
Judge: Hon. Craig Griffin

Reservation #72437178

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Superior Court of California,
County of Orange
08/30/2016 at 05:18:00 PM
Clerk of the Superior Court
By Davon Velasquez, Deputy Clerk

Attorneys for Cross-Defendant Joshua Abel dba Abel Law Offices

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

JOSHUA ABEL dba ABEL LAW OFFICES,

Plaintiff,

vs.

JEFFREY J. CIACHURSKI, CAPTIVA VERDE
INDUSTRIES, LTD, CAPTIVA VERDE
FARMING CORP., GREENBRIAR CAPITAL
CORP., AND DOES 1-50, INCLUSIVE

Defendants,

CASE NO.: 30-2016-00841335

**CROSS DEFENDANT'S MEMORANDUM
OF POINTS AND AUTHORITIES IN
SUPPORT OF DEMURRER TO CROSS-
COMPLAINANTS' SECOND AMENDED
CROSS-COMPLAINT; REQUEST FOR
CCP SECTION 128.5 MONETARY
SANCTIONS IN THE AMOUNT OF \$11,390
AGAINST ANGELO & WHITE AND ALL
CROSS-COMPLAINANTS**

[FILED CONCURRENTLY WITH NOTICE OF DEMURRER AND
DEMURRER TO SECOND AMENDED CROSS-COMPLAINT;
REQUEST FOR JUDICIAL NOTICE; DECLARATION OF BRUCE D.
ABEL IN SUPPORT THEREOF]; DEMAND TO LODGE ORIGINAL
TRANSCRIPT; PROPOSED ORDER]

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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

JOSHUA ABEL dba ABEL LAW OFFICES,

CASE NO.: 30-2016-00841335

Plaintiff,

**DECLARATION OF BRUCE D. ABEL IN
SUPPORT OF DEMURRER TO CROSS-
COMPLAINANTS' SECOND AMENDED
CROSS-COMPLAINT**

vs.

JEFFREY J. CIACHURSKI, CAPTIVA VERDE
INDUSTRIES, LTD, CAPTIVA VERDE
FARMING CORP., GREENBRIAR CAPITAL
CORP., AND DOES 1-50, INCLUSIVE

[FILED CONCURRENTLY WITH NOTICE OF DEMURRER AND
DEMURRER TO SECOND AMENDED CROSS-COMPLAINT;
MEMORANDUM OF POINTS AND AUTHORITIES ISO; REQUEST
FOR CCP 128.5 MONETARY SANCTIONS; REQUEST FOR
JUDICIAL NOTICE; DEMAND TO LODGE ORIGINAL
TRANSCRIPT; PROPOSED ORDER]

Defendants,

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JOSHUA ABEL dba ABEL LAW OFFICES,

Plaintiff,

vs.

JEFFREY J. CIACHURSKI, CAPTIVA VERDE
INDUSTRIES, LTD, CAPTIVA VERDE
FARMING CORP., GREENBRIAR CAPITAL
CORP., AND DOES 1-50, INCLUSIVE

Defendants,

CASE NO.: 30-2016-00841335

**CROSS DEFENDANT'S REQUEST FOR
JUDICIAL NOTICE IN SUPPORT OF
DEMURRER TO CROSS-
COMPLAINANTS' SECOND AMENDED
CROSS-COMPLAINT; REQUEST FOR
CCP SECTION 128.5 MONETARY
SANCTIONS IN THE AMOUNT OF \$11,390
AGAINST ANGELO & WHITE AND ALL
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[FILED CONCURRENTLY WITH NOTICE OF DEMURRER AND
DEMURRER TO SECOND AMENDED CROSS-COMPLAINT;
MEMORANDUM OF POINTS AND AUTHORITIES ISO;
DECLARATION OF BRUCE D. ABEL; [PROPOSED] ORDER;
DEMAND TO LODGE ORIGINAL TRANSCRIPT]

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