

APR 27 2011

2011 APR 27 AM 8:52

BY: A. LUM

(30)
CLERK-SUPERIOR COURT
SAN DIEGO, CA

SHARON NOONAN KRAMER, PRO PER

2031 Arborwood Place
Escondido, CA 92029
(760) 746-8026
(760) 746-7540 Fax

**SUPERIOR COURT FOR THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO, NORTH DISTRICT**

BRUCE J. KELMAN,

Plaintiff

v.

SHARON KRAMER,

Defendant.

CASE NO. 37-2010-00061530-CU-DF-NC

**DEPARTMENT 30
THE HONORABLE THOMAS
NUGENT PRESIDING**

**REQUEST FOR CORRECTION OF
CLERICAL ERRORS IN MINUTE
ORDER & FOR PRODUCTION OF
NOTICE OF ENTRY OF JUDGMENTS
DATED "12/18/08" AND "September 24,
2008"**

Department: N-30

Upon the court's request, Defendant Sharon ("Kramer") submits this document regarding errors in the ("Minute Order") issued on April 20, 2011, and notices Plaintiff Counsel, Keith ("Scheuer") of this legal filing. This matter came on Plaintiff Bruce ("Kelman")'s ExParte motion and hearing, April 14, 2011, for correction of error in a prior Minute Order issued on April 5, 2011, in the Department N-30 of the above Court, the Honorable Thomas P. Nugent, Judge presiding. On April 14, 2011, Scheuer, Esq. of Scheuer & Gillett appeared telephonically on behalf of Kelman. Kramer appeared in person on her own behalf.

I.

BACKGROUND

1. The underlying libel litigation is ("Kelman & GlobalTox v. Kramer") GIN044539, D054496. In a trial of August, 2008, Kelman prevailed over Kramer. Kramer was the prevailing party over ("GlobalTox") Inc.
2. There was no judgment properly entered or noticed as entered on September 24, 2008.
3. There were no judgments entered or noticed as entered after amended rulings from oral arguments of 12/12/08 and 4/03/09 awarding costs to any party.
4. On November 4, 2010, and again with his proposed injunctive relief orders, Scheuer submitted a false document of judgment never entered or noticed as entered, containing purported dates of judgment entered "12/18/08 MGarland" and "September 24, 2008" to *this court*. This misleads this court that Kelman has a legal judgment against Kramer and therefore a legal right to file an injunctive relief motion. (Attached hereto is the false document submitted to this court by California licensed attorney, Keith Scheuer; & email from Scheuer to Kramer dated October 16, 2008 proving Scheuer knows prevailing party, Kramer, was not noticed by court)

1 5. The sole claim of that case is that Kramer's use of five words, "**altered his under oath statements**" was a
2 maliciously defaming accusation of perjury. Kramer has been sued for no other words or any complete
3 sentence.

4 6 In six years time including in trial, there is no evidence of Kramer ever being impeached that she believes
5 Kelman's words describing the US ("Chamber")'s mold statement and its connection to the American College of
6 Occupational and Environmental Medicine ("ACOEM")'s mold statement of "lay translation" flipping to "two
7 different activities" and flipping back to "translation" were "altered his under oath statements" to hide the mass
8 marketing trail of how it became a fraud in US health policy that science holds moldy buildings do not harm.
9 These statements were made once Kelman was forced to discuss the papers together in front of a jury by a
10 prior testimony of his from Arizona coming into the Oregon trial over the defense counsel's objections.

11 7. For six years, Kramer provided all courts to oversee the libel case with uncontroverted and irrefutable
12 evidence that Kelman committed perjury and Scheuer repeatedly suborned it, including in his appellate brief of
13 September 2009, falsely professing Kelman gave an expert opinion in 2003 in Kramer's own mold lawsuit with
14 her homeowner insurer, that Kelman is irrefutably evidenced (including to this court) to have never given:

15 KELMAN: "I testified the types and amounts of mold in the Kramer house could
16 not have caused the life threatening illnesses she claimed."

17 SCHEUER: "Dr. Kelman testified in a deposition that the type and amount of
18 mold in the Kramer house could not have caused the life threatening illnesses
19 that Kramer claimed. Apparently furious that the science conflicted with her
20 dreams of a remodeled house, Kramer launched an obsessive campaign to destroy the
21 reputation of Dr. Kelman and GlobalTox."

22 8. In post trial motions, the trial judge was evidenced of Kelman's perjury and Scheuer's suborning of perjury
23 to establish malice and upon which she limited the scope of the trial to Kelman's science could not be
24 discussed. No less than 23 pieces of evidence proving perjury and suborning of perjury were provided to the
25 trial judge by Kramer in post trial motions.

26 9. In oral argument of 12/12/08, the trial judge refused to be "drawn into that kind of petty behavior" of "asking
27 Mr. Scheuer to explain himself on things" regarding the perjury and suborning of perjury.

28 10. The trial judge stated that a source of Kramer's, who witnessed Kelman's Oregon trial testimony, was the
clear and convincing proof that Kramer's writing was incorrect.

11. The same source witness had submitted an affidavit stating that Kramer's writing of altered his under oath
statements was an accurate description of Kelman's testimony in Oregon on February 18, 2005.

12. When the error of deeming a source who said the writing was correct to be the clear and convincing
evidence the writing was incorrect was brought to the trial judge's attention she replied, "You know what, Mrs.
Kramer. Now you are just arguing with me."

13. The trial judge was reminded that there was no evidence, clear and convincing or otherwise, of Kramer
ever impeached in trial as to her subjective belief in the validity of her words.

14.. The trial judge replied to this reminder with, "Well the jury didn't believe you."

15. The trial judge then proceeded to refuse to hear any oral argument for Kramer's Motion for New Trial.

16. 12/12/08 was the trial judge's last day to preside over this court. She moved to Family Court.

17. On 12/22/08, Kramer filed a Motion for Reconsideration with the presiding judge, North County courts.
18. On 1/08/09, Kramer received a notice that the presiding judge could not hear such a motion because there was a judgment entered on "12/18/08" causing the lower court to lose jurisdiction.
19. Kramer had received no Notice of Entry of any such judgment. She physically went to the Vista courthouse to look for and question the existence of the purported "12/18/08" judgment.
20. There was no such judgment in the court records file. The Clerk of the Court, Michael Garland, gave no explanation when questioned why. Instead he stated "We are all sick of you".
21. On 1/09/09, the court mailed Kramer a fake document with the notation "12/18/08 MGarland" of a judgment that was never entered or noticed as entered. "MGarland" is Michael Garland. He was the trial judge, the Honorable Lisa C Schall's, Clerk of the Court in 2008.
22. Claim of loss of jurisdiction based on a judgment not entered caused Kramer to have to appeal, Pro Per. This court's Minute Order appears to acknowledge that there was no such judgment entered on 12/18/08.
23. The above stated facts are a matter of public record, evidenced in the court files of Kelman & GlobalTox v. Kramer GIN044539, D054406 and in this case of Kelman v. Kramer. 37-2010-00061530-CU-DF-NC.

II ERRORS IN THE MINUTE ORDER

1. Error #1 On April 20, 2011, this court rendered an order again stating that Kramer be enjoined from republishing a sentence she has never published, '**Dr. Kelman altered his under oath statements on the witness stand**' while he testified as a witness in an Oregon lawsuit". There are quotation marks around six words within the sentence for which Kramer has never been sued. "**Dr. Kelman on the witness stand**". The Minute Order is enjoining a US citizen from writing words and a sentence for which they were never even sued in violation of the First Amendment of the Constitution.

2. Error #2 The order is based on a purported judgment entered against Kramer and falsely presented to this court by Scheuer as being noticed as entered on "12/18/08 MGarland" and on "September 24, 2008". No judgments were entered on either of these dates or properly noticed as entered by the courts. "For example, courts have held that the 'document entitled 'Notice of Entry' ' mentioned in the rule must bear precisely that title, and the 'file stamped copy of the judgment' [citation] must truly be file stamped." (Id. At p. 903, quoting rule 8.104(a)(1).)" Citizen for Civic Accountability v. Town of Danville (2008) 167 Cal.App.4th 1162.

There is no evidence that the court noticed prevailing party, Kramer, of either of these purported judgments (because they did not); or that any document titled "Notice of Entry" exists on either of the dates of September 24, 2008 or 12/18/08. CCP 664.5(b) states, "*Promptly upon entry of judgment in a contested action or special proceeding in which a prevailing party is not represented by counsel, the clerk of the court shall mail notice of entry of judgment to all parties who have appeared in the action or special proceeding and shall execute a certificate of such mailing and place it in the court's file in the cause*". Plainly stated, no Notice of Entry from court to prevailing party + plaintiff submitting false documents to court = no legal right to enjoin a defendant.

3. Error #3 The Minute Order states, "Any modifications that need to be made to the judgment in GIN044539 must be done in that case and have no effect on...this preliminary injunction". While stating that judgments must be properly entered in GIN044539 the court is simultaneously ignoring the evidence that there

are no judgments entered after 12/12/08 and ignoring that Scheuer submitted a false document to this court containing "MGarland 12/18/08" to mislead this court that there was. By law, *"..once the attorney realizes that he or she has misled the court, even innocently, he or she has an affirmative duty to immediately inform the court and to request that it set aside any orders based upon such misrepresentation; also, counsel should not attempt to benefit from such improvidently entered orders."* Datig v. Dove Books, Inc. (1999) 73 Cal.App.4th 964, 981 Rule 5-200 of the Rules of Professional Conduct promulgated by the State Bar provide that *"[i]n presenting a matter to a tribunal," a member of the bar "(A) Shall employ, for the purpose of maintaining the causes confided to the member such means only as are consistent with truth;*

4. Error #4 The Minute Order states, "Judge Dato's ruling dated April 9, 2009 that the defendant was entitled to costs in the amount of \$2,545.28. Any modifications that need to be made to the judgment in GIN044539 must be done in that case.." Kramer is Pro Per. As such, it is the court's responsibility to enter a judgment in favor of Kramer. CCP 664.5(b) states, *"Promptly upon entry of judgment in a contested action or special proceeding in which a prevailing party is not represented by counsel, the clerk of the court shall mail notice of entry of judgment to all parties.* Kramer requested Appellate Court to rectify. Instead they wrote an opinion with a known falsehood that judgments had been entered.

5. Error #5 The Minute Order states, "The preliminary injunction shall issue on plaintiff's filing of such written undertaking" with no statement of "upon a signed court order granting a preliminary injunctive relief." On April 14, 2011, Kelman placed \$5,000 in an escrow account and is attempting to claim a preliminary injunctive relief order is in effect with no court signed injunctive relief order. Scheuer sent Kramer an email at 12:08 on 4/22/11, stating "The court has issued the preliminary injunction we requested, and the undertaking has been filed. The injunction is in effect."

Kelman is attempting to enforce a non-existent judgment against Kramer in the amount of \$7,252.65. CCP 490.020.(a) states *"The liability of a plaintiff for causing a wrongful attachment under Section 490.010 includes both of the following: (1) All damages proximately caused to the defendant by the wrongful attachment. (2) All costs and expenses, including attorney's fees, reasonably expended in defeating the attachment. (b) The liability of a plaintiff for wrongful attachment pursuant to Section 490.010 is limited by the amount of the undertaking".* Kramer is entitled to keep the \$5000 for the expense of this illegal attempt by Kelman to silence her of a fraud in policy; his criminal perjury in Kelman & GlobalTox v. Kramer; and to vex, harass and steal money from Kramer based upon no legitimate judgment or legitimate preliminary injunction. Scheuer submitted and Kelman was awarded \$3,626.33 in costs incurred by GlobalTox, a party Kramer prevailed over in trial.

6. Error #6 The Minute Order states, "A judgment entered in GIN044539 on September 24, 2008...See Ex Parte Application, Exhibit 1." There was no judgment properly entered or noticed as entered on September 24, 2008. As a prevailing party in trial, the court was to notice Kramer. They did not. CCP 664.5(b) applies to Error #7 in the Minute Order. (Kramer only became aware of the action taken on 9.24.08 because someone had seen the purported judgment entered, on the Veritox/GlobalTox web site and sent it to her.)

7. Error #7 The Clerk's Certificate of Service By Mail indicates that the Minute Order came from the Kearny Mesa Branch. The Minute Order is not properly noticed as coming from Department 30 of the North County Superior Court.

8. Error #8 In oral argument of 4/14/11, Kramer stated, "I am so sorry, Your Honor, but on behalf of the health and safety of the American public, I will not be able to abide by any injunctive relief order you may grant." This is because this court is relying on prior improvidently entered orders that rewarded a US Chamber author/plaintiff's use of criminal perjury to establish malice to deem a never impeached United States citizen to be a "malicious liar" over an accurate writing impacting public health in egregious violation of the First Amendment of the Constitution. This order is furthering benefiting a California licensed attorney's suborning of criminal perjury in a prior litigation and rewarding submission of false documents to *this court* of judgments that were never entered. This is to gag, vex, harass and financially ruin a never impeached whistle blowing citizen.

This order is making it against the law for the never impeached citizen to write and speak of errors of the courts in Kelman & GlobalTox v. Kramer that have aided with a fraud in US public health policy to continue by the courts' ignoring the evidence that an author of policy for the Chamber and ACOEM used criminal perjury in a malicious, strategic, libel litigation. It is a matter of court record that the appellate court was informed and evidenced that "WHEN" they acknowledged the plaintiff's criminal perjury, "THEN" the fraud in policy would immediately cease by rightfully exposing the conflicts of interests & lack of truthfulness in legal proceedings by the plaintiff, policy author and professional witness, Kelman. Instead, the courts rewarded the criminal behavior. This order is furthering the abuse of the prior courts that aids the US Chamber adverse to public interest.

As such, Kramer respectfully informs this court that she will not stop writing and speaking of the fraud in policy and of the courts rewarding criminal perjury in a malicious, strategic litigation that aids the fraud to continue; regardless of the order this court may issue. She informs this court of this because she will not lie to this court that she will follow an injunctive relief order based on prior improvidently entered orders and false documents submitted to this court. What this court does with this information is unknown to Kramer. But, public safety and integrity in the courts are more important to Kramer than consequences of refusing to be silenced of fraud in policy aided to continue by the judiciaries to oversee Kelman & GlobalTox v. Kramer.

It is a violation of Kramer's first amendment rights to reward criminal perjury in a strategic litigation against her and then issue a court order that Kramer be gagged from writing of what the courts have done. The evidence of the appellate court rewarding criminal perjury in a strategic litigation over a matter of public health is a matter of public record in the court files of Kelman & GlobalTox v. Kramer. It is also a matter of public record that they falsely stated in their 2010 opinion that there are judgments entered in the case. As a matter of public record, anyone should be able to write and speak of the documents of the case, including Kramer.

III PLAINTIFF, PRODUCE THE NOTICES OF ENTRY & OTHER DOCUMENTS

On December 17, 2010, Kramer requested that Kelman produce documents and answer requests for admissions that impact this preliminary injunctive relief order. On January 7, 2011, Scheuer delivered a reply in which virtually none of the documents requested were produced and virtually none of the requests for admissions were admitted or denied. No evidence was produced of Kramer repeating the phrase in question without disclosing it is the subject of a law suit. There is a hearing scheduled before this court on July 16, 2011, regarding the lack of production and admissions by Kelman.

Unless Scheuer provides evidence to this court proving otherwise in his reply; the court must find that Kramer's uncontroverted statements, evidence and prior exhibits she submitted to this court are correct regarding Kelman's and Scheuer's attempts to mislead this court to issue an injunctive relief based on false

documents and statements. *"Uncontradicted and unimpeached evidence is generally accepted as true."* Garza v. Workmen's Comp. App. Bd. (1970) 3 Cal.3d 312, 317-318 [90 Cal.Rptr. 355]; Keulen v. Workers' Comp. Appeals Bd., supra, 66 Cal.App.4th at p. 1099.)

"Honesty in dealing with the courts is of paramount importance, and misleading a judge is, regardless of motives, a serious offense." Paine v. State Bar 14 Cal.2d 150, 154 (1939)

1. Statement #1 There is no judgment properly entered or noticed in Kelman & GlobalTox v. Kramer giving Kelman any legal right to seek an injunctive relief against Kramer.

a.) Requested Production of Document #28. "The purported judgment entered on September 24, 2008 and accompanying Notice Of Entry of Judgment as mailed to you from the San Diego Superior Court in Kelman and GlobalTox v. Kramer." (As a prevailing party, Kramer should have been noticed from the courts.)

b.) Requested Production of Document #32. "The purported judgment entered on December 18, 2008 and accompanying Notice of Entry of Judgment as mailed to you from the San Diego Superior Court in Kelman and GlobalTox v. Kramer." (There is no such judgment in existence. As a prevailing party, Kramer should have been noticed from the court. She was not. Even if the judgment existed, it would be invalid.)

2. Statement #2 Kelman used criminal perjury and Scheuer repeatedly suborned the perjury to establish false, yet needed reason for malice in Kelman & GlobalTox v. Kramer. They are now trying to mislead this court to further the damage to Kramer by their illegalities while strategically litigating.

a.) Requested Production of Document #37. "Evidence presented in Kelman and GlobalTox v. Kramer corroborating the validity of the following statements as found in your declarations regarding a purported malice causing testimony you purportedly gave in Kramer's litigation with her insurer, Mercury: "She [Kramer] apparently felt that the remediation work had been inadequately done, and that she and her daughter had suffered life-threatening diseases as a result. I testified that the type and amount of mold in the Kramer house could not have caused the life-threatening illnesses that she claimed."

b.) Requested Production of Document #38. "Evidence presented in Kelman and GlobalTox v. Kramer that corroborates Kramer harbors malice for Kelman stemming from Mercury, as stated in your briefs in Kelman and GlobalTox v. Kramer: "Dr. Kelman testified in a deposition that the type and amount of mold in the Kramer house could not have caused the life threatening illnesses that Kramer claimed. Apparently furious that the science conflicted with her dreams of a remodeled house, Kramer launched an obsessive campaign to destroy the reputation of Dr. Kelman and GlobalTox."

c.) Requested Production of Document #35. "Pages of your declarations submitted in Kelman and GlobalTox v. Kramer regarding your purported testimony in Mercury".

d.) Requested Production of Document #36. "Pages of your legal counsel's briefs in Kelman and GlobalTox v. Kramer regarding your purported testimony in Mercury".

e.) Requested Production of Document #39. "Evidence presented in Kelman and GlobalTox v. Kramer corroborating Kramer was displeased with your involvement with Mercury".

3. Statement #3 Kelman presented no evidence in Kelman & GlobalTox v. Kramer that Kramer did not believe the subjective belief in the validity of her words, "altered his under oath statements". This court is being mislead to gag a never impeached US citizen in violation of the First Amendment.


1 a.) Requested Production of Document #41."Evidence presented in Kelman and GlobalTox v. Kramer
2 impeaching Kramer's subjective belief that your words of February 18, 2005 of "lay translation" to "different
3 papers, two different activities", and flipping back to "translation" are considered by Kramer to be "altered his
4 under oath statements".

4 **4. Statement #4 Injunctive relief granted would be rewarding the use of perjury by Kelman, suborning of
perjury by Scheuer in a prior litigation and their submission of false documents in this litigation.**


5 **IV.**
6 **CONCLUSION**

7 This court must find that based on the facts in evidence, the court is issuing a preliminary injunctive relief
8 order that gags of a never impeached US citizen based on the use of plaintiff perjury and suborning of perjury in
9 a prior litigation in a case where no judgment against the US citizen was ever properly entered. This makes any
10 gag order issued to be illegal and in violation of Kramer's constitutional rights to speak and evidence the truth in
11 America without retribution. This court has an obligation to sanction Scheuer for his violations of Business and
12 Professions Codes of submitting false documents to the courts, suborning perjury and failing to answer
13 Interrogatories. This court has the authority and the legal duty to Kramer and to the US public to acknowledge
14 criminalities while strategically litigating by US Chamber author, Kelman, and his "legal" counsel, Scheuer, and
15 to dismiss this case. Kramer prays for no granting of an injunctive relief which would hamper her and many
16 others from curtailing a deception in private sector public health policy over the mold issue that harms US
17 children, families and workers.

14 Respectfully submitted on April 27, 2011

15 
16 Sharon Kramer, Pro Per

17 I declare under penalty of perjury that the foregoing is true and correct, and a copy of this legal filing is mailed
18 to Keith Scheuer, Counsel for Bruce Kelman.

19 
20 Sharon Kramer, Pro Per

Subj: Re: Costs of Kelman and GlobalTox vs. Kramer
Date: 10/16/2008 3:39:58 P.M. Pacific Daylight Time
From: SNK 1955
To: Kscheuer

Thank you

In a message dated 10/16/2008 2:54:11 P.M. Pacific Daylight Time, Kscheuer writes:

I had mistakenly assumed that the Court would prepare and mail the Notice of Entry of Judgment. I will mail you a copy today.

Keith Scheuer
SCHEUER & GILLET
4640 Admiralty Way, Suite 402
Marina Del Rey, CA 90292
Tel.: (310) 577-1170
Fax: (310) 301-0035

In a message dated 10/16/2008 12:19:55 P.M. Pacific Daylight Time, SNK 1955 writes:

Dear Mr. Scheuer,

Today, I received a note from you with your costs from the case. However, what I have not received is any documentation showing the judgment has been entered, or what the judgment is. As I understand it, the courts charged you to do this. No? Have you taken the steps required to enter the judgement?

If so, have you mailed a copy to me?

Also, why do you not sign the proof of service documents?

Sincerely,
Mrs. Kramer

1 1. That Defendant Sharon Kramer acted wrongly by
2 making the following statement: "Dr. Kelman altered his under
3 oath statements on the witness stand" while he testified as a
4 witness in an Oregon lawsuit; that Kramer made the above
5 statement to persons other than Kelman; that the persons to
6 whom the statement was made reasonably understood that the
7 statement was about Bruce Kelman; that persons who read the
8 statement reasonably could have understood it to mean that
9 Kelman had committed the crime of perjury or testified
10 falsely while on the witness stand; that the statement was
11 false; that Kelman proved, by clear and convincing evidence,
12 that Kramer knew the statement was false, or had serious
13 doubts about the truth of the statement; and that Kelman be
14 awarded a monetary sum of nominal damages in the amount of
15 \$1.00 (one dollar and no cents).
16
17

18 2. That Kramer made the statement to persons other
19 than GlobalTox, Inc., and that the persons to whom the
20 statement was made did not reasonably understand that the
21 statement was about GlobalTox.
22

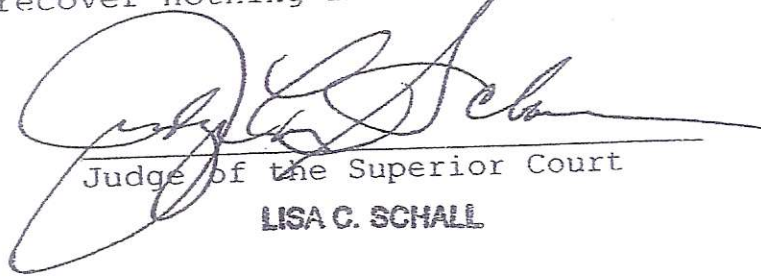
23 NOW THEREFORE, IT IS ORDERED, ADJUDGED AND DECREED that
24 Plaintiff Bruce Kelman recover the sum of \$1.00 (one dollar
25 and no cents) as nominal damages from Defendant Sharon
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

mganand 12/15/08

Kramer, and costs in the amount of \$ 7,252.65, and that
Plaintiff GlobalTox, Inc. recover nothing in this action.

Dated: 9/24/08


Judge of the Superior Court
LISA C. SCHALL

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Sharon Kramer, Pro Per 2031 Arborwood Place Escondido CA 92029 TELEPHONE NO.: 760-746-8026 FAX NO. (Optional): 760-746-7540 E-MAIL ADDRESS (Optional): snk1955@aol.com ATTORNEY FOR (Name): Pro Per	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF STREET ADDRESS: 325 S. Melrose Drive MAILING ADDRESS: CITY AND ZIP CODE: Vista, CA 92081 BRANCH NAME: North County Superior Court	
PETITIONER/PLAINTIFF: Bruce Kelman	
RESPONDENT/DEFENDANT: Sharon Kramer	
PROOF OF SERVICE BY FIRST-CLASS MAIL—CIVIL	CASE NUMBER: 37-2010-00061530-CU-DF-NC

(Do not use this Proof of Service to show service of a Summons and Complaint.)

- I am over 18 years of age and **not a party to this action**. I am a resident of or employed in the county where the mailing took place.
- My residence or business address is:
2031 Arborwood Place
Escondido, CA 92029
- On (date): **4/27/11** I mailed from (city and state): **Escondido, CA**
 the following documents (specify):
Request for Correction of Clerical Errors In Minute Order & For Production of Notice of Entry of Judgments
Dated "12/18/08" and "September 24, 2008"

☐ The documents are listed in the *Attachment to Proof of Service by First-Class Mail—Civil (Documents Served)* (form POS-030(D)).

- I served the documents by enclosing them in an envelope and (check one):
 - ☒ **depositing** the sealed envelope with the United States Postal Service with the postage fully prepaid.
 - ☐ **placing** the envelope for collection and mailing following our ordinary business practices. I am readily familiar with this business's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service in a sealed envelope with postage fully prepaid.
- The envelope was addressed and mailed as follows:
 - Name** of person served: **Keith Scheuer**
 - Address** of person served:
4640 Admiralty Way #402
Marina Del Rey, CA 90292

☐ The name and address of each person to whom I mailed the documents is listed in the *Attachment to Proof of Service by First-Class Mail—Civil (Persons Served)* (POS-030(P)).

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Date:

4/27/11

(TYPE OR PRINT NAME OF PERSON COMPLETING THIS FORM)

(SIGNATURE OF PERSON COMPLETING THIS FORM)