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7 Attorneys for WESTERN NATIONAL
CONSTRUCTION

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10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
11 **COUNTY OF SANTA CLARA**

12

13 CILKER APARTMENTS, LLC,
14 Plaintiff,
15 vs.
16 WESTERN NATIONAL CONSTRUCTION,
et al.,
17 Defendants.
18

19 AND RELATED CROSS-ACTIONS

CASE NO. 113CV258281
**WESTERN NATIONAL
CONSTRUCTION'S NOTICE OF
SUPPLEMENTAL DEPOSIT OF
DOCUMENTS**

JUDGE: Hon. Peter H. Kirwan
DEPT.: 1
ACTION FILED: December 26, 2013
TRIAL DATE: February 1, 2016

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21 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

22 PLEASE TAKE NOTICE that pursuant to the Case Management Order ("CMO"),
23 Defendant and Cross-Complainant Western National Construction ("Western") shall deposit true
24 and correct copies of supplemental relevant, non-privileged, and responsive documents with the
25 document depository Aiken & Welch, 111 North Market Street, San Jose, California. An index
26 identifying the documents is attached as Exhibit "A."

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Please note that Western objects to the CMO to the extent it calls for the deposit and production of documents and/or information protected by the attorney-client privilege and/or the attorney work product doctrine.

Western has made a reasonable and diligent search to locate all documents in its possession and control which are relevant, responsive, and non-privileged. Western's investigation and discovery into the facts and circumstances involved in this matter continue. To the extent such investigation and discovery reveals information bearing upon Western's response to the CMO discovery obligations, Western reserves the right to supplement or change its response.

DATED: July 27, 2015

GREEN & HALL, APC

By:



Michael A. Erlinger
Attorneys for WESTERN NATIONAL
CONSTRUCTION

EXHIBIT "A"

Bates Range	Description
WNC 147201-147439	Bulletins
WNC 147440-148487	Subcontractor and third party job file documents
WNC 148488-148494	Landscape Bulletins
WNC 148495-149219	Subcontractor and third party job file documents
WNC 149220-149393	Project Schedule
WNC 149394-152030	Subcontractor and third party job file documents
WNC 152031-152325	Cilker file
WNC 152326-153989	Subcontractor and third party job file documents
WNC 153990-154123	Accounting documents

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PROOF OF SERVICE

I am employed in the County of Orange, State of California. I am over the age of 18 and not a party to the within action. My business address is 1851 East First Street, 10th Floor, Santa Ana, CA 92705-4052.

On July 27, 2015, I served the within document(s) described as:

WESTERN NATIONAL CONSTRUCTION'S NOTICE OF SUPPLEMENTAL DEPOSIT OF DOCUMENTS

on each interested party in this action as stated below:

BY E-SERVICE: I electronically served the document(s) via Santa Clara County Superior Court's Electronic Filing System on the recipients designated on the transaction receipt located on the Santa Clara County Superior Court's Electronic Filing System website. *[See Transaction Receipt on SCE Filing Website]*

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

Executed on July 27, 2015, at Santa Ana, California.



Sheila Ellis

GREEN & HALL
ATTORNEYS AT LAW
A PROFESSIONAL CORPORATION