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10 Madera Framing, Inc.

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 COUNTY OF SANTA CLARA

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

Case No.: 113CV258281

**OBJECTION OF MADERA FRAMING,  
INC. TO PLAINTIFF'S NOTICE TO  
ATTORNEY IN LIEU OF SUBPOENA TO  
COMPEL ATTENDANCE BEFORE  
COURT WITH PRODUCTION OF  
DOCUMENTS**

Trial Date: July 25, 2016  
Time: 9:00 a.m.  
Dept: 1

18 )  
19 )  
20 AND RELATED CROSS-ACTIONS. )  
21 )

Complaint Filed: March 20, 2014

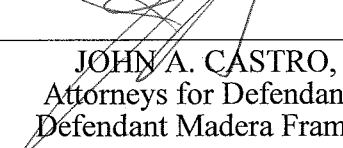
22 Defendant/Cross-Defendant MADERA FRAMING, INC. ("MFI") hereby objects to  
23 Plaintiff CILKER APARTMENTS, LLC's ("Plaintiff") Notice to Attorney in Lieu of Subpoena to  
24 Compel Attendance Before Court with Production of Documents ("Notice") directed to Juan  
25 Godines.

26 Pursuant to Code of Civil Procedure section 1987, subdivision (b), MFI objects to the  
27 Notice on the ground that Mr. Godines is not an officer, director, or managing agent of MFI.

1 Thus, he cannot be compelled to appear without the issuance of a subpoena. (Code Civ. Proc.  
2 §§1986, 1987, subd. (b).)

3  
4 DATED: June 30, 2016

BOORNAZIAN, JENSEN & GARTHE  
A Professional Corporation

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7 By:   
8 JOHN A. CASTRO, ESQ.  
9 Attorneys for Defendant/Cross-  
10 Defendant Madera Framing, Inc.

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