

1 **T. JOSHUA RITZ & ASSOCIATES, INC.**  
2 **ATTORNEYS-AT-LAW**  
3 15233 Ventura Blvd Ste 1002  
4 Sherman Oaks CA 91403  
5 T: 818.788.1123  
6 F: 818.788.1126  
7 [www.rhllp.com](http://www.rhllp.com)  
8 T. JOSHUA RITZ, BAR NO. 172364  
9 LALEH B. SHOKOHI, BAR NO. 320852  
10  
11 ATTORNEYS FOR PLAINTIFF  
12 CHRISTINA ELLIS

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF ORANGE**

11 CHRISTINA ELLIS, ) CASE NO. 30-2020-01154444-CU-PO-CJC  
12 )  
13 Plaintiff, ) (*Assigned for all purposes to the Hon. Gregory*  
14 ) (*H. Lewis in Dept. C26*)  
15 v. )  
16 ) **NOTICE OF RULING RE PLAINTIFF**  
17 ) **CHRISTINA ELLIS’ MOTION TO**  
18 ) **COMPEL FURTHER SPECIAL**  
19 ) **INTERROGATORY RESPONSES AND**  
20 ) **RECOVERY OF SANCTIONS FROM**  
21 ) **DEFENDANT PILLARS RECOVERY, LLC**  
22 )  
23 ) **DATE:** May 17, 2021  
24 ) **TIME:** 10:30 a.m.  
25 ) **DEPT:** C26  
26 )  
27 ) Filed: August 12, 2020  
28 ) Trial Date: November 8, 2021  
29 )

22 **PLEASE TAKE NOTICE** that on May 17, 2021, the Court heard Plaintiff  
23 Christina Ellis’ motion to compel further written responses to special interrogatories and  
24 recovery of sanctions against Defendant Pillars Recovery, LLC. The Honorable Judge  
25 Gregory H. Lewis presided over the hearing. Appearing remotely for Plaintiff  
26 (via Courtcall) Christina Ellis, was T. Joshua Ritz of T. JOSHUA RITZ & ASSOCIATES,  
27 INC. Appearing remotely for defendant Pillars Recovery, LLC, was Jackson G. DeWolfe

1 of WOOD, SMITH, HENNING & BERMAN, LLP. Counsel for Defendant Michael  
2 Berber, Daniel E. Kenney of HARRINGTON, FOXX, DUBROW & CANTER, made no  
3 appearance.

4 After the Court considered the moving papers and hearing oral arguments, including  
5 specifically Mr. DeWolfe's arguments addressing the Court's tentative, the Court adopted  
6 its tentative as its final RULING and issued the following ORDER:

- 7
- 8 The Court grants in part and denies in part Plaintiff's motion;
- 9 Within 15 days Defendant Pillars Recovery, LLC shall fully respond to  
10 special interrogatories 14, 26 and 27;
- 11 Within 15 days Defendant Pillars Recovery, LLC shall pay Plaintiff's counsel  
12 sanctions in the amount of \$973; and
- 13 The Motion is denied as to special interrogatory nos. 28 and 29.
- 14

15 Dated: May 17, 2021

Respectfully submitted,

16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**T. JOSHUA RITZ & ASSOCIATES, INC.**

*T. Joshua Ritz*

By: \_\_\_\_\_  
T. JOSHUA RITZ  
LALEH B. SHOKOHI  
ATTORNEYS FOR PLAINTIFF  
CHRISTINA ELLIS

**PROOF OF SERVICE — 1013a**

1 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

2 I am employed in the county of Los Angeles, State of California; I am over the age  
3 of 18 years and not a party to the within action; my business address is 15233 Ventura  
4 Blvd., Suite 1002, Sherman Oaks, CA 91403

5 On **May 17, 2021**, I served true copies of the following document (s) described as: **NOTICE**  
6 **OF RULING RE PLAINTIFF CHRISTINA ELLIS' MOTION TO COMPEL FURTHER**  
7 **SPECIAL INTERROGATORY RESPONSES AND RECOVERY OF SANCTIONS FROM**  
8 **DEFENDANT PILLARS RECOVERY, LLC** on the interested parties in this action to:

8 Michelle A. Birtja, Esq.  
9 Jackson G. DeWolfe, Esq.  
10 WOOD, SMITH, HENNING  
& BERMAN LLP  
11 10960 Wilshire Blvd., 18<sup>th</sup> Floor  
12 Los Angeles, CA 90024-3804  
mbirtja@wshblaw.com  
jdewolfe@wshblaw.com

Daniel E. Kenney, Esq.  
HARRINGTON, FOXX,  
DUBROW & CANTER, LLP  
333 South Hope Street, Suite 1000  
Los Angeles, CA 90071-1429  
dkenney@hfdclaw.com

13  
14        **BY MAIL:** I enclosed the document(s) in a sealed envelope/package addressed to  
15 the addressee(s) designated and placed it for mailing, following our ordinary  
16 business practices. I am readily familiar with the mailing practice of my place of  
17 employment in respect to the collection and processing of correspondence and  
18 pleadings for mailing. It is deposited with the United States Postal Service on that  
19 same day in the ordinary course of business with postage fully prepaid.

20        **BY HAND DELIVERY:** On the above date, I delivered such envelop(s) by  
21 hand to the addressee (s).

22        **BY FEDERAL EXPRESS/OVERNIGHT:** I caused such envelope(s) to be  
23 delivered via Federal Express Overnight to the addressee(s) designated.

24   **X**   **BY EMAIL:** by electronic mail transmission to the email address(es) listed.

25 (STATE) I declare under the penalty of perjury under the laws of  
26   **X**   the State of

27 Executed on **May 17, 2021**, Sherman Oaks, California.

28 *Claudia Arellano*

\_\_\_\_\_  
Claudia Arellano