

1 LARRY ROTHMAN & ASSOCIATES  
2 LARRY ROTHMAN – State Bar No. 72451  
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4 1 City Boulevard West, Suite 850  
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8 tocollect@aol.com E-Mail

9 Attorneys for the Defendants:  
10 STEVEN D. SILVERSTEIN, RON ELTER, and GRE  
11 DEVELOPMENT, INC. as agents and Trustee of the  
12 Via Corbina Trust #4

13 **UNITED STATES DISTRICT COURT**  
14 **CENTRAL DISTRICT OF CALIFORNIA**  
15 **SOUTHERN DIVISION**

16  
17 CHARLES EDWARD LINCOLN, III

18 Plaintiff,

19 vs.

20 STEVEN D. SILVERSTEIN, RON ELTER,  
21 GRE DEVELOPMENT, INC., Individually  
22 and as agents for and Trustee of the Via  
23 Corbina Trust #4 JOHN MURK, DIANNE  
24 D'AGNOLO, The Honorable, SANDRA  
25 HUTCHENS, THE SHERIFF OF ORANGE  
26 COUNTY, CAL-WESTERN  
27 RECONVEYANCE, WELLS FARGO  
28 BANK, N.A., DENNIS STACY,  
COLDWELL BANKER, and JOHN &

CASE NO: SACV09-1072 DOC(Ex)

DECLARATION OF LARRY  
ROTHMAN RE: MEET AND  
CONFER

DATE: November 16, 2009  
TIME: 8:30 a.m.  
COURTROOM: 9D  
(reserved)

1 JANE DOES 1-20,  
2  
3 Defendants.

4 **DECLARATION OF LARRY ROTHMAN**

5 I, LARRY ROTHMAN, declare as follows:

6  
7 1. That I am an attorney, licensed to practice law in all Courts of the State  
8 of California and this District Court and that I have personal knowledge of all facts  
9 set forth in this Declaration. forth in this Declaration or base this statements on the  
10 best of my information and belief.  
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12  
13 2 Pursuant to Local Rule 7-3, on October 9, 2009, at 10:50 a.m., I  
14 contacted and spoke with the Plaintiff, Charles Edward Lincoln, III concerning my  
15 intended Motion to Dismiss. We discussed the problems I believed concerned the  
16 allegations in the compliant including the causes of action and lack of diversity.  
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19 3 After a cordial conversation, Mr. Lincoln disagreed with my contentions  
20 thus this Motion is being filed.  
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I declare under penalty of perjury that the facts set forth in this Declaration are true and correct and that this Declaration was signed in Orange, California, on October 13, 2009.

  
LARRY ROTHMAN,  
DECLARANT

## PROOF OF SERVICE

State of California, County of Orange:

I am employed in the county and state aforesaid. I am over the age of 18 and not a party to the within action; my business address is: City Plaza, 1 City Boulevard West, Suite 850, Orange, California 92868

On October 13, 2009, served the foregoing document described as:

**DECLARATION OF LARRY ROTHMAN RE: MEET AND  
CONFER**

on the parties listed below in this action by placing a true copy thereof or the originals in a sealed envelope sent first class mail and addressed as follows:

**Charles Edward Lincoln, III  
c/o Dr. Orly Taitz, Attorney At Law  
29839 S. Margarita Parkway  
Rancho Santa Margarita, California 92688**

I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

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

Executed on October 13, 2009, at Orange, California.

  
\_\_\_\_\_  
LARRY ROTHMAN