

1 LARRY ROTHMAN & ASSOCIATES
2 LARRY ROTHMAN – State Bar No. 72451
3 City Plaza
4 1 City Boulevard West, Suite 850
5 Orange, California 92868
6 (714) 363 0220 Telephone
7 (714) 363 0229 Facsimile
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 CHRISTYNA LYNN GRAY, CHARLES
18 EDWARD LINCOLN, III, RENADA
19 NADINE MARCH,

20 Plaintiffs,

21 vs.

22 STEVEN D. SILVERSTEIN, RON ELTER,
23 GRE DEVELOPMENT, INC., Individually
24 and as agents for and Trustee of the Via
25 Corbina Trust #4 CHRISTOPHER
26 ARCHULETA, MERS(Mortgage Electronic
27 Registration Services), other unnamed
28 Attorney, Defendants, John and Jane Does
1-10, MEGLADON FINANCIAL, LLP.
ATLAS PROPERTIES REAL ESTATE,
JAMES RADWAN, ROCHELLE MATKIN

CASE NO: SACV09-1072 DOC(Ex)

OPPOSITION TO EX PARTE
APPLICATION TO RESPOND TO
THE MOTION TO DISMISS

1 TRUSTEE CORPS, RUSSELL BELL,
2 QUALITY LOAN SERVICE Corp. FIRST
3 NEWPORT PROPERTIES, LLC., JOHN
4 MURK, DIANNE D'AGNOLO, The
5 Honorable, SANDRA HUTCHENS, THE
6 SHERIFF OF ORANGE COUNTY, JP
7 MORGAN CHASE (as successor in Interest
8 to WASHINGTON MUTUAL), ONEWEST
9 BANK, NA (As successor in Interest and
10 Alleged assignee of Indymac, CAL-
11 WESTERN RECONVEYANCE, WELLS
12 FARGO BANK, N.A., DENNIS STACY,
13 COLDWELL BANKER, and JOHN &
14 JANE DOES 1-20,

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Defendants.

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

the Defendants, STEVEN D. SILVERSTEIN, RON ELTER, and GRE

DEVELOPMENT, INC. oppose Plaintiffs Motion for an Extension of Time to

Oppose the Motion to dismissed based upon the following grounds and request that
this Court:

1 The Motion to Extend the Time to Respond was not timely. It was not filed
and served 14 days (plus 3 days for mailing) prior to the hearing date:.

2 The Motion only applies to one Plaintiff. There are three purported
individual Plaintiffs who will have separate grounds for the Motion since the
facts related to each Plaintiff are different.

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3 These Defendants believe the Charles Lincoln who is disbarred in
4 California is actually practicing law and representing each of the Plaintiffs.
As such, Defendants request this Court to modify Rule 26 requirements
and allow Defendants to depose CHRISTYNA LYNN GRAY and/ or
RENADA NADINE MARCH on the limited issue as to who prepared the
first amended complaint and who has advised them of their legal rights in
this matter. After said Depositions are taken, these Defendants will
report to the court their findings and provide the deposition transcripts for
the Court to review to see if a crime (practicing law without a license)
exists.

Respectfully submitted,

LARRY ROTHMAN & ASSOCIATES

Dated: January 14, 2010

s/LARRY ROTHMAN

LARRY ROTHMAN,
Attorney for Defendants:
STEVEN D. SILVERSTEIN, RON ELTER, and GRE DEVELOPMENT, INC. as
agents and Trustee of the Via Corbina Trust #4

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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 January 14, 2010, served the foregoing document described as:
OPPOSITION TO EX PARTE APPLICATION TO RESPOND TO THE MOTION TO DISMISS

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:

SEE ATTACHED PROOF OF SERVICE LIST

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 United States that the above is true and correct.

Executed on January 14, 2010, at Orange, California.

/S MONIQUE PINKS

MONIQUE PINKS

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**Charles Edward Lincoln, III
c/o Peyton Yates Freiman
603 Elmwood Place, Suite #6
Austin, Texas 78705**

**Christyna Lynn Gray
16351 Arlington Lane
Huntington Beach, California 92649**

**Renada Nadine March
7 Bluebird Lane
Aliso Viejo, California 92656**

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