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Superior Court of California,
County of Orange
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Clerk of the Superior Court
By Monique Ramirez, Deputy Clerk

5 Attorney for Defendant
6 WILLIAM WHITFORD, a.k.a. BILLY WHITFORD

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

11 BRUCE IBBETSON, an individual and DONNA)
12 WARWICK, an individual, derivatively on behalf)
13 of NEWPORT AQUA TTC CENTER, a California)
14 domestic non-profit public benefit corporation,)

15 Plaintiff,)

16 v.)

17 DR. WILLIAM GRANT, a.k.a. DR. BILL)
18 GRANT, an individual; JON VAN CLEVE, an)
19 individual; JAMES NETZER, an individual;)
20 WILLIAM WHITFORD, a.k.a. BILLY)
21 WHITFORD, an individual; MALIA HOHL, an)
22 individual; KELLY THOMPSON, an individual;)
23 JOSE JIMENEZ, an individual; MICHAEL)
24 SCOTT, an individual; JOHN PUAKEA, an)
25 individual; XAVIER BECERRA, ATTORNEY)
26 GENERAL OF THE STATE OF CALIFORNIA,)
27 as an Indispensable Party; and DOES 1 through)
28 50, inclusive,)

Defendants.)

Case No. 30-2017-00958851-CU-FR
-CJC

OBJECTIONS TO THE
DECLARATION OF
PATRICK ROLFES

Judge: Nathan Scott

Date: July 9, 2018
Time: 2:00 p.m.
Department: C-12

1 Defendants William Grant, Jon Van Cleave, James Netzer and William Whitford hereby
 2 object to the following statements in the Declaration of Patrick Rolfes (all numbers in the Objections
 3 column are to Evidence Code sections):
 4

OBJECTIONABLE STATEMENTS:	OBJECTIONS:	RULING:
5 6 1. "Over the past few years I have 7 noticed a disturbing trend with regard 8 to the donated funds that I and others 9 involved with the NAC Junior Rowing Program have worked so hard to raise." p. 2:3-5	1. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
10 2. "Despite the fact that many 11 fundraising events were specifically for 12 the NAC Junior Rowing Program, and 13 that donors were told that their 14 donation would be restricted and used 15 for the specific equipment needed in 16 the NAC Junior Rowing Program, or to help pay for other Junior Rowing equipment needs, these targeted donations have not been spent on the items or programs for which the donors specifically donated." p. 2:5-9	2. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
17 3. "Last April 2017, Junior Rowing 18 conducted a fundraising campaign 19 using the online platform, "Classy.org", to raise money specifically to buy two new four-person rowing boats." p. 2:10-11	3. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
20 4. "By May 1, 2017, approximately 21 \$46,000 was raised for this specific 22 purpose from people who were told in 23 writing and via videos featuring pleas from the head Junior Rowing Coaches for donations for this specific purpose." p. 2:12-14	4. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
24 5. "According to NAC internal 25 financial records, the NAC's bank 26 balance was \$57,975.00 on that date." 27 p. 2:14-15 28	5. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___

OBJECTIONABLE STATEMENTS:	OBJECTIONS:	RULING:
6. "On May 3, 2017, a payment of \$15,000 was made to pay down the Chase Credit Card." p. 2:15-16	6. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
7. "On May 5, 2017, another payment of \$20,000 was made to pay down the Chase Credit Card leaving \$26,528.27 in the bank account." p. 2:16-17	7. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
8. "On May 12, 2017, the bank account balance, per internal NAC records, was \$948.32 and yet none of the money raised by the NAC Junior Rowing Program's Classy.org fundraising campaign had been spent on its intended purpose, and no four-person rowing boats were purchased." p. 2:17-20	8. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
9. "The Chase Credit Card was a primary method of misuse of NAC funds- a fact that the Board was made aware of on numerous occasions." p. 2:20-21	9. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
10. "On August 28, 2017, I attended an executive session of the NAC Board of Directors." p. 2:22	10. Irrelevant (210, 350).	Sustained: ___ Overruled: ___
11. "Also in attendance were William "Billy" Whitford, the Executive Director of the NAC, Kirsten Hermstad the NAC's Director of Marketing & Development and Board Members William "Bill" Grant, Susan Skinner, Jon Van Cleave, James Netzer, Bruce Ibbetson, Donna Warwick, Steve Patterson, and Greg Collins." p. 2:23-26	11. Irrelevant (210, 350).	Sustained: ___ Overruled: ___

OBJECTIONABLE STATEMENTS:	OBJECTIONS:	RULING:
12. "During the meeting, a number of the concerns being raised at the NAC by certain members were discussed and addressed directly by Mr. Whitford." p. 2:26-27	12. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
13. "One of the major concerns that was before the Board and others present at the executive session was that it had become apparent that a for-profit business was being run out of the NAC." p. 3:1-3	13. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
14. "This was a concern because, as a non-profit organization, the NAC cannot involve itself with for-profit activities." p. 3:3-4	14. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
15. "When asked about this, Mr. Whitford admitted that Puakea Designs (a for-profit company) was running several business operations out of the NAC." p. 3:4-5	15. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
16. "Mr. Whitford admitted that Puakea was having its paddles being manufactured in the NAC Shop." p. 3:5-6	16. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
17. Mr. Whitford further admitted that NAC employees were some of the workers manufacturing Puakea paddles in the NAC shop, and that NAC assets were used to make the paddles." p. 3:6-8	17. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___

OBJECTIONABLE STATEMENTS:	OBJECTIONS:	RULING:
18. "In addition, Mr. Whitford admitted that four, 45-foot Chinese shipping containers full of Puakea outrigger canoes had been dropped at the NAC and on Newport Beach City land not for use at the NAC, but rather for sale and distribution to others." p. 3:9-11	18. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
19. "Mr. Whitford further admitted that NAC employees were performing Puakea distribution services for the United States West Coast." p. 3:11-13	19. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
20. "Mr. Netzer, while he was renegotiating the NAC's lease with the City of Newport Beach, stated that he was aware that these container shipments were being shipped to the NAC for commercial distribution." p. 3:13-15	20. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
21. "Puakea Designs was not the only for-profit business being run out of the NAC." p. 3:16	21. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
22. "It also came to light that several NAC Shop employees were running a boat repair and painting cash business out of the NAC shop." p. 3:16-18	22. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
23. "In running this under-the-table business, the NAC employees used NAC supplies and assets, such as paint, parts and tools purchased with NAC funds." p. 3:18-19	23. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___

OBJECTIONABLE STATEMENTS:	OBJECTIONS:	RULING:
24. "Customers of the boat repair shop included Ms. Skinner (former NAC Board of Director), UCI, and So Cal. Scullers, all of whom paid for these services with cash given directly to the NAC Shop employees." p. 3:19-21	24. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
25. "Mr. Whitford admitted that he was aware of this operation, and that he had even referred customers to the business." p. 3:22-23	25. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
26. "Another problem that had come to light was the fact that NAC salaried coaches were also getting paid in cash under the table by the NAC Masters Women Rowing Program ("WOW") for coaching services performed at the NAC." p. 3:24-26	26. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
27. "Mr. Whitford admitted that he facilitated these transactions, and that it had been occurring for several years." p. 3:26-27	27. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
28. "As I stated above, another problem of particular concern to me, as the Director of the Junior Rowing Program, was the fact that Mr. Whitford caused targeted donations made to the Junior Rowing Program to be spent on other NAC programs and the NAC's General Operating expenses." p. 4:1-4	28. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
29. "During the meeting, Mr. Whitford also admitted to this, stating: 'I have operated the NAC for decades, based on the simple policy that it pays its bills from the income it receives. If that is something that needs changing, the Board has to make that decision, not me, but this is how I do it and the Board never told me not to or gave me any financial resources to help with this matter.'" p. 4:4-8	29. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___

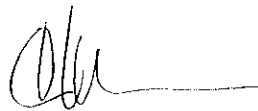
OBJECTIONABLE STATEMENTS:	OBJECTIONS:	RULING:
<p>30. "Mr. Whitford went on, stating: 'I run the NAC like I'm the Dad with the wallet. I control where the money is to be spent no matter where it comes from. I set up the accounting system to put things into silos, thinking it would be easier for the Board to understand, but that was a huge mistake, because now people expect the money to be spent on where it came from and that's not how I do it.'" p. 4:9-13</p>	<p>30. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).</p>	<p>Sustained: ___ Overruled: ___</p>
<p>31. "Another issue that had been raised by a group of NAC parents and members was the use of the NA C's credit cards by employees (including Mr. Whitford himself) for personal expenses, including fuel, groceries, lunches, clothing, sunglasses, Halloween costumes, and home fixtures (for their own homes)." p. 4:14-17</p>	<p>31. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).</p>	<p>Sustained: ___ Overruled: ___</p>
<p>32. "This was addressed at this same Executive Session Meeting, by NAC Board Secretary and Treasurer, Jon Van Cleave, when he stated, that he reviewed all of the credit card statements and expenses and he determined that all the expenses were legitimate expenses." p. 4:17-20</p>	<p>32. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).</p>	<p>Sustained: ___ Overruled: ___</p>
<p>33. "Later when questioned about his statement, Mr. Van Cleave changed his statement and said that the NAC does not have a spending/expense policy, so the personal expenses are just to be considered as "perks" of the job." p. 4:20-22</p>	<p>33. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).</p>	<p>Sustained: ___ Overruled: ___</p>
<p>34. "Mr. Whitford further admitted to purchasing two trucks in his own name using NAC funds, including the use of funds that were derived by a loan to the NAC, which was issued by Jim Netzer (NAC Board Member)." p. 4:23-25</p>	<p>34. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).</p>	<p>Sustained: ___ Overruled: ___</p>

OBJECTIONABLE STATEMENTS:	OBJECTIONS:	RULING:
35. "Moreover, Mr. Whitford admitted that he used NAC funds to pay a \$10,000+ personal penalty to the Internal Revenue Service, and had the NAC expense the transaction." p. 4:25-27	35. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
36. "More recently, I accompanied Christine Emmel, a Junior Rowing parent and active NAC volunteer, to a March 29, 2018 meeting with Mr. Grant at Peet's Coffee on 17th St. in Costa Mesa." p. 5:1-3	36. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
37. "The purpose of the meeting was to discuss allegations of questionable and/or illegal activity at the NAC, allegations which were of great concern to Junior Rowing parents and the NAC community as a whole." p. 5:3-5	37. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
38. "The meeting arose from a March 22, 2018 email sent by Ms. Emmel to Mr. Grant, carbon-copying a group of various NAC community members, including myself." p. 5:6-7	38. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
39. "In that email, Ms. Emmel expressed and summarized a number of concerns that had been expressed by many members of the NAC community, and included a bullet point list of specific allegations of wrongdoing." p. 5:7-10	39. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
40. "Attached hereto, as Exhibit A, is a true and correct copy of the email from Ms. Emmel that I received on March 22, 2018." p. 5:10-11	40. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___

OBJECTIONABLE STATEMENTS:	OBJECTIONS:	RULING:
41. "In response to Ms. Emmel's email, Mr. Grant sent an email offering to meet with Ms. Emmel and 'go through' the claims 'individually.'" p. 4:12-13	41. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
42. "I was also carbon-copied on that email." p. 5:13	42. Irrelevant (210, 350).	Sustained: ___ Overruled: ___
43. "Attached hereto, as Exhibit B, is a true and correct copy of the email from Mr. Grant that I received on March 23, 2018." p. 15:14-15	43. Irrelevant (210, 350); hearsay (1200).	Sustained: ___ Overruled: ___
44. "Before the meeting took place, Ms. Emmel sent another email in which she expressed the importance of a written response and, to the extent Mr. Grant rather not take on the task of written explanations, offered to transcribe the answers he was to provide at the meeting, and to communicate those answers to the other recipients of the email, including myself." p. 5:16-19	44. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
45. "Attached hereto, as Exhibit C, is a true and correct copy of the email from Ms. Emmel that I received on March 23, 2018." p. 5:19-21	45. Irrelevant (210, 350); hearsay (1200).	Sustained: ___ Overruled: ___
46. "On March 29, 2018, I accompanied Ms. Emmel to the meeting with Mr. Grant." p. 5:22	46. Irrelevant (210, 350).	Sustained: ___ Overruled: ___
47. "Mr. Grant had previously agreed to my presence at the meeting." p. 5:23	47. Irrelevant (210, 350).	Sustained: ___ Overruled: ___
48. "During our meeting, the issues raised in Ms. Emmel's email were extensively discussed, and I witnessed Ms. Emmel taking detailed notes." p. 5:23-25	48. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___

OBJECTIONABLE STATEMENTS:	OBJECTIONS:	RULING:
49. "On May 15, 2018, I received an email from Ms. Emmel attaching a copy of her handwritten notes." p. 5:26-27	49. Irrelevant (210, 350).	Sustained: ___ Overruled: ___
50. "The body of the email also contained a typewritten version of those notes." p. 5:27	50. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
51. "Attached hereto, as Exhibit D, is a true and correct copy of the email from Ms. Emmel that I received on May 15, 2018." p. 6:1-2	51. Irrelevant (210, 350); hearsay (1200).	Sustained: ___ Overruled: ___
52. "I have reviewed Ms. Emmel's notes regarding the meeting." p. 6:3	52. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___
53. "I can attest that the notes accurately reflect the statements Mr. Grant made to me and Ms. Emmel during the March 29, 2018 meeting." p. 6:3-5	53. Irrelevant (210, 350); argumentative (<i>in re marriage of Heggie (2002) 99 cal. App. 4th 28, 30, fu: 3</i>); inadmissible opinion (800-803); hearsay (1200); lacks foundation (403, 702); no personal knowledge (702).	Sustained: ___ Overruled: ___

Dated: June 29, 2018



David B. Dimitruk, attorney for defendants William Grant, Jon Van Cleave, James Netzer and William Whitford

1 PROOF OF SERVICE

2 Ibbetson, etc. v. Grant, et al.

3 Orange County Superior Court Case Number 30-2017-00958851-CU-FR-CJC

4 STATE OF CALIFORNIA, COUNTY OF ORANGE

5 I am an active member of the State Bar of California. I am over the age of eighteen years and not
6 a party to the action. My business address is 5 Corporate Park, Suite 220, Irvine, California 92606.
7 On June 29, 2018 I served the document entitled OBJECTIONS TO THE DECLARATION OF
8 PATRICK ROLFES on the interested parties in said action by serving it electronically through
9 OneLegal to the following persons:

<p>10 George L. Hampton IV, 11 HAMPTONHOLLEY LLP, 2101 East Coast 12 Highway, Suite 100, Corona del Mar, 13 California 92625 (Attorneys for the plaintiffs)</p> <p>14 sellis@hhlawyers.com 15 merlinger@hhlawyers.com 16 bgoodwin@hamptonholley.com</p>	<p>Xavier Becerra (Attorney General of California), Tania Ibanez (Senior Assistant Attorney General), James M. Toma (Supervising Deputy Attorney General Caroline K. Hughes (Deputy Attorney General), 300 South Spring Street, Suite 1702 Los Angeles, CA 90013</p> <p>teresa.depaz@doj.ca.gov caroline.hughes@doj.ca.gov</p>
<p>17 Catherine J. Weinberg, Esq., Buckner, 18 Robinson & Mirkovich, 3146 Redhill 19 Avenue, Suite 200, Costa Mesa, California 20 92626 (Attorneys for defendants Malia Hohl, 21 Kelly Thompson, Jose Jimenez and Maika 22 Scott)</p> <p>23 cweinberg@bamlaw.com</p>	<p>Theodore Senet, Esq., Gibbs Giden Locher Turner Senet & Wittbrodt LLP, 1880 Century Park East, 12th Floor, Los Angeles, California 90067 (Attorney for defendant Johnny Puakea)</p> <p>tsetnet@gibbsgiden.com</p>

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

26 EXECUTED on June 29, 2018 at Irvine, California.



27
28
David B. Dimitruk