

1 Laura Lynn Hammett
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5

6 *Plaintiff in pro se*

7 Laura Lynn Hammett
8

9 UNITED STATES DISTRICT COURT
10 SOUTHERN DISTRICT OF CALIFORNIA
11

12 Laura Lynn Hammett,

13 Plaintiff,

14 v.

15 Mary E. Sherman, et al.

16 Defendant.
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Case No.: 19-CV-0605-LL-AHG

Ex Parte Motion to Combine Opposition
to Attorney Fee Motions by Attorney
Defendants [ECF Nos. 270 & 271]
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1 TO: THE COURT AND ALL PARTIES OF RECORD:

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3 Plaintiff in pro se, Laura Lynn Hammett ("Plaintiff"), requests leave to combine the
4 oppositions to Defendants Ellis Roy Stern, Alan N Goldberg, Stern and Goldberg, Patrick
5 C. McGarrigle, and McGarrigle, Kenney & Zampielo ("Attorney Defendants") motions
6 for attorney fees [ECF Nos. 270 and 271], for the following reasons:

7 Plaintiff is substantially finished writing the opposition and brief to the MKZ
8 Defendants' motion. Plaintiff intends to write an affidavit today that discusses her
9 medical and economic status. The exact affidavit will be used for each opposition.

10 Plaintiff has skimmed through the S & G Defendants' motion. The arguments and
11 relief requested seem to be substantially the same as in the MKZ brief, with different
12 data. Plaintiff does not know why the Attorney Defendants did not combine their motions
13 pursuant to the Civil Chamber Rule of the Honorable Judge Linda Lopez, Rule 3D.

14 The difference Plaintiff noticed is that the amount of fees requested are significantly
15 different. Plaintiff intends to discuss the comparison in her opposition to each motion.

16 In case Plaintiff is wrong in believing the two motions should have been consolidated,
17 requiring only one response, Plaintiff is asking for leave to consolidate the opposition to
18 both motions.

19 WHEREFORE, in the interest of judicial economy, Plaintiff requests leave to combine
20 the two oppositions and their briefs of points and authorities so as to file one opposition
21 of approximately three pages plus cover, signature block and certificate of service and
22 one brief of points and authorities of approximately nine pages plus cover, signature
23 block and certificate of service.

24
25 Respectfully submitted,

26
27 11/14/2022

/s/ Laura Lynn Hammett

Laura Lynn Hammett, Plaintiff in Pro Se
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Certificate of Service

A copy of this Ex Parte Motion to Combine Opposition to Attorney Fee Motions by Attorney Defendants was served upon all counsel of record in the case by filing on the electronic filing system, which automatically notifies all attorneys of record.

11/14/2022 /s/ Laura Lynn Hammett
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