

1 Arbella Azizian # 294696  
2 BAKER, OLSON, LeCROY & DANIELIAN  
3 100 W. BROADWAY # 990  
4 GLENDALE, CA 91210  
5 T: 818 502 5600  
6 F. 818 241 2653  
7 azizian@boldlaw.com

8 Attorneys for Plaintiff Gregg "Rocky" Brooks

9 SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

10 CENTRAL DISTRICT

11 GREGG "ROCKY" BROOKS

12 Plaintiff,

13 v.

14 JOHN C. DEPP, an individual; BRAD  
15 FURMAN, an individual; INFINITUM  
16 NIHIL, A Californian Corporation; And  
17 DOES 1-50

18 Defendants.

Case No.: BC713123

**PLAINTIFF'S OPPOSITION TO  
DEFENDANT'S MOTION TO  
RECLASSIFY AS LIMITED CIVIL  
CASE; MEMORANDUM OF  
POINTS AND AUTHORITIES;  
DECLARATION OF ARBELLA  
AZIZIAN**

Date: 9/3/2019  
Time: 8:30 a.m.  
Dept: 56

Complaint Filed: 7/5/2018  
Trial Date: 10/21/2019

19 **I. INTRODUCTION**

20 Defendant seeks to reclassify Plaintiff's complaint from unlimited to limited  
21 jurisdiction with this untimely motion. In his motion, Defendant fails to satisfy the  
22 requirements of California Civil Code section 403.040(b), failing to show that Plaintiff's  
23 complaint is incorrectly classified and that good cause exists for not seeking the  
24 reclassification earlier.  
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26 "Under the *Walker* standard a matter may be reclassified as a limited civil action  
27 "when (i) the absence of jurisdiction is apparent before trial from the complaint, petition, or  
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