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*Attorneys for Plaintiff and the
Proposed Class*

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

LUIS M. SALAS RAZO, on his own
behalf and on behalf of all others similarly
situated,

Plaintiffs,

v.

AT&T MOBILITY SERVICES, LLC, a
Delaware Corporation; and DOES 1
through 100, inclusive,

Defendants.

CASE NO. 1:20-cv-00172-NON-HBK

CLASS ACTION

**PLAINTIFF'S NOTICE OF MOTION AND
MOTION TO COMPEL DISCOVERY AND
REQUEST FOR SANCTIONS;
MEMORANDUM OF POINTS AND
AUTHORITIES**

1 **TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:**

2 **PLEASE TAKE NOTICE** that Plaintiff Luis M. Salas Razo (“Plaintiff”) will and
3 hereby does move the Court for an Order Compelling Defendant AT&T Mobility Services LLC
4 to respond to Plaintiff’s Special Interrogatories, Set One, Nos. 1–3, 5, 13 and 18 and Requests for
5 Production of Documents Set One, Nos. 18-20 and further seeks an Order overruling Defendant’s
6 objections (1) that Plaintiff has not made a sufficient prima facie showing the class action
7 requirements are satisfied; (2) that Defendant’s motion to dismiss is pending; (3) based on the
8 proposed settlement in *Wallack et al. v., AT&T*, San Bernardino Superior Court, Case No.
9 CIVSB2117915; and (4) based on unsupported boilerplate objections; and ordering Defendant to
10 provide depositions testimony as to class issues. Additionally, Plaintiff seeks sanctions in the
11 amount of \$8,280 in light of Defendant’s failure to provide complete discovery responses, instead
12 providing evasive responses and improper objections without substantial justification.

13 This motion is made following extensive meet and confer of counsel and a telephonic
14 Discovery Conference with the Court held on September 20, 2021. Plaintiff’s motion is made
15 pursuant to Rules 26 and 37 of the Federal Rules of Civil Procedure on the grounds that
16 Defendants’ refusal to produce class contact information and class wide discovery is improper.

17 This Motion is based upon this Notice the Motion, the accompanying Memorandum of
18 Points and Authorities, the declarations of Kiley L. Grombacher and Leslie H. Joyner, and all
19 pleadings, records, and papers on file in this action, and such other further evidence and arguments
20 as may be presented at the time of the hearing in this matter.

21 Respectfully Submitted,

22 DATED: September 24, 2021

BRADLEY/GROMBACHER, LLP
LAW OFFICES OF SAHAG MAJARIAN II

24 By: /s/ Kiley L. Grombacher

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27 *Attorneys for Plaintiff and the proposed Class*

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