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13 **UNITED STATES DISTRICT COURT**
14 **CENTRAL DISTRICT OF CALIFORNIA**

15 BENNION & DEVILLE FINE
HOMES, INC., a California
16 corporation, BENNION & DEVILLE
FINE HOMES SOCAL, INC., a
17 California corporation, WINDERMERE
SERVICES SOUTHERN
18 CALIFORNIA, INC., a California
corporation,

19 Plaintiffs,

20 v.

21 WINDERMERE REAL ESTATE
22 SERVICES COMPANY, a Washington
corporation; and DOES 1-10
23

24 Defendant.

25 AND RELATED COUNTERCLAIMS
26
27
28

Case No. 5:15-CV-01921 R (KKx)

Hon. Manual L. Real

**DECLARATION OF JEFFREY A.
FEASBY RE: COURT'S
JUNE 8, 2016 ORDER**

Courtroom: 8

Complaint Filed: September 17, 2015

1 I, Jeffrey A. Feasby, hereby declare,

2 1. I am an attorney for Defendant and Counterclaimant Windermere Real
3 Estate Services Company (“WSC”) in this matter. I am licensed to practice law in
4 all state and federal courts in the State of California. I am the attorney at Pérez
5 Wilson Vaughn & Feasby who was primarily responsible for preparing WSC’s
6 discovery responses, working with WSC’s employees to locate and collect
7 potentially responsive documents, reviewing those documents, and producing those
8 that were responsive. I have personal, firsthand knowledge of the facts set forth
9 below, and if called as a witness, I could and would competently testify to the
10 information set forth herein.

11 2. On June 8, 2016, I received the Court’s Order Granting in Part and
12 Denying in Part Plaintiffs’ Motion to Compel. The efforts undertaken to comply
13 with plaintiffs’ discovery requests are set forth in my prior declaration and the
14 declarations of Paul Drayna and Josh Christenson filed with the Court on May 6,
15 2016 along with the parties’ Joint Stipulation to Plaintiffs’ Motion to Compel
16 Production of Documents and Responses (Docket No. 42).

17 3. In addition to those efforts, and after reviewing the Court’s order, I
18 went back through all of plaintiffs’ interrogatories, WSC’s responses, the parties’
19 meet and confer correspondence and my notes regarding same, and WSC’s
20 supplemental interrogatory responses. Upon reviewing these materials, I
21 determined that WSC had fully complied with its discovery obligations with regard
22 to its responses to plaintiffs’ interrogatories.

23 4. With regard to plaintiffs’ requests for production, I went back through
24 plaintiffs’ requests, WSC’s responses, the parties’ meet and confer correspondence
25 and my notes regarding same, and WSC’s supplemental responses in order to
26 determine which categories of documents WSC had agreed to produce. I then went
27 back through the hard copy files I had received from the client as well as the
28 documents the client had uploaded to the VPN site, which included the emails that

