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22 SAN DIEGO COUNTY CREDIT UNION

23 **IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA**

24 **COUNTY OF SAN DIEGO**

CALIFORNIA COAST CREDIT UNION, a
California Nonprofit Corporation

Plaintiff,

vs.

SAN DIEGO COUNTY CREDIT UNION, a
California Nonprofit Corporation

Defendant.

Case No.: 25CU063843C

Assigned for All Purposes to:
Honorable Carolyn M. Caietti, Department C-70

**UNREDACTED DEFENDANT SAN DIEGO
COUNTY CREDIT UNION'S NOTICE OF
MOTION AND MOTION TO COMPEL
FURTHER DEPOSITION TESTIMONY OF
KELLEN GILL, OR, ALTERNATIVELY,
TO DRAW AN ADVERSE INFERENCE;
MEMORANDUM OF POINTS AND
AUTHORITIES**

*[Filed concurrently with Declaration of Sarah
Kelly-Kilgore; Separate Statement; [Proposed]
Order]*

Hearing:

Date: September 18, 2026

Time: 10:30 AM

Judge: Hon. Carolyn M. Caietti

Dept.: C-70

RESERVATION ID: 100654

Complaint Filed: November 25, 2025

SEALED RECORD—MAY NOT BE
EXAMINED WITHOUT COURT ORDER

DISCOVERY MOTION CONTAINING
CONFIDENTIAL INFORMATION; NO
SEALING MOTION REQUIRED (CRC 2.550)

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

2 **PLEASE TAKE NOTICE THAT**, on September 18, 2026 at 10:30 AM, or as soon
3 thereafter as counsel may be heard, in Department C-70 of the above-captioned Court, located at
4 100 Union Street, San Diego, California 92101, Defendant San Diego County Credit Union
5 (SDCCU) will and hereby does move to compel additional deposition testimony from Kellen Gill,
6 the Chief Audit and Risk Officer and former Supervisory Committee Member of Plaintiff California
7 Coast Credit Union (Cal Coast) on the subject of Mr. Gill's criminal record and his reporting (or
8 non-reporting) of his criminal conviction in California for Driving Under the Influence (DUI).

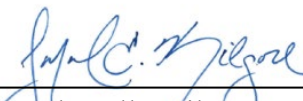
9 The Motion is made pursuant to Code of Civil Procedure section 2025.480,
10 subds. (b)-(k) and California Rules of Court, rule 3.1345, and on the grounds that Mr. Gill refused
11 to provide responses to SDCCU's deposition questions, and good cause exists for compelling
12 Mr. Gill to answer questions about his DUI conviction (a matter of public record) under oath.
13 Absent the requested testimony, this Court should draw an adverse inference about the matters in
14 question.

15 This Motion is based on the Notice of Motion and Motion, the attached Memorandum of
16 Points and Authorities, the attached Separate Statement, the attached Declaration of Sarah Kelly-
17 Kilgore, and the pleadings, records and documents on file in this action, and such oral or additional
18 documentary evidence as may be presented before or at the hearing on this matter.

19 Dated: January 26, 2026

HOLLAND & KNIGHT LLP

20
21 By: _____


Sarah Kelly-Kilgore
Amir A. Shakoorian
Zachary J. Watson

22
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Attorneys for Defendant
SAN DIEGO COUNTY CREDIT UNION

1 **MEMORANDUM OF POINTS AND AUTHORITIES**

2 **I. INTRODUCTION**

3 Approximately a month after assuming the role responsible for all compliance, audit, and
4 risk for Plaintiff Cal Coast and after serving as a member of Cal Coast’s Supervisory Committee,
5 Kellen Gill was arrested on August 31, 2023, a Thursday, for driving under the influence of
6 alcohol—with a blood alcohol content nearly twice the legal limit. Even while reporting directly to
7 Cal Coast’s Board and being singularly responsible for auditing, identifying, monitoring, and
8 controlling risk throughout Cal Coast, Mr. Gill apparently **did not inform anyone at Cal Coast** of his
9 arrest and ensuing conviction, **nor did anyone at Cal Coast discover it**. Moreover, Mr. Gill continued
10 to serve as the Chief Audit and Risk Officer while undertaking a recovery program and submitting
11 his time at Cal Coast as qualifying “community service” hours, **all without ever disclosing** his
12 criminal arrest and conviction or the precipitating circumstances.

13 When asked **basic questions at his deposition about these events and the public records**
14 **arising from them, Mr. Gill categorically refused to respond. He noted (understandably) that the**
15 **topic made him “uncomfortable” and also repeatedly insisted (less understandably) that it was “not**
16 **relevant to [his] current employment.”** As striking as it was for Cal Coast’s head of risk management
17 to dodge straightforward questioning about his criminal conviction for drunk driving, the remainder
18 of his deposition was of a piece: despite acknowledging that regulations required a compliance
19 management system to identify, monitor, measure, and control risk, Mr. Gill could not identify any
20 policies or procedures that he has implemented and enforced in order to ensure identification,
21 monitoring, and control of risk. That may explain why, from the peculiar perspective of this Chief
22 Audit and Risk Officer, **it is “not relevant” that** he recently went through an arrest, criminal
23 conviction, and alcohol abuse recovery program. But Mr. Gill’s idiosyncratic take does not control.
24 SDCCU now respectfully seeks relief because its outstanding questions are ***indeed relevant*** when
25 assessing Cal Coast’s approach to compliance and risk.

26 Mr. Gill is, in essence, Cal Coast’s air traffic controller. He is responsible for monitoring
27 all air traffic and ensuring there are systems, controls, prophylaxis, and reports sufficient to raise
28 appropriate flags, spot all risks, remediate quickly and effectively, and forestall any hazards that

1 could ever cause a crash. Yet he **evidently saw no occasion to flag** his own arrest for drunk driving,
2 his own attendance in an alcohol recovery program, and his own DUI conviction. It speaks volumes
3 that Mr. Gill, **by all indications, unilaterally deemed his DUI arrest, conviction, and sentence wholly**
4 **and necessarily irrelevant to his continued performance** as Chief Audit and Risk Officer for a state-
5 chartered financial institution that is responsible for over 200,000 local members with over \$3 billion
6 in combined deposits. Assuming Mr. Gill made that decision for not only himself but also Cal
7 Coast, and, by extension, for the merged entity that Cal Coast wants this Court to spawn by force of
8 judicial decree, the least he should do is answer basic questions about his decision-making.

9 Accordingly, this Court should compel Mr. Gill to answer SDCCU's questions regarding his
10 arrest, conviction, and sentence, and his decision not to report any of those. In the absence of such
11 compulsion, this Court should draw adverse inferences about Mr. Gill's **calculated decision not to**
12 **report information and developments** that were obviously material to any responsible credit union
13 of the sort Cal Coast purports to be.

14 **II. LEGAL STANDARD**

15 Unless otherwise limited by court order, "any party may obtain discovery regarding any
16 matter, not privileged, that is relevant to the subject matter involved in the pending action or to the
17 determination of any motion made in that action, if the matter either is itself admissible in evidence
18 or appears reasonably calculated to lead to the discovery of admissible evidence." (Code Civ. Proc.,
19 § 2017.010.) For discovery purposes, relevance is construed broadly: information is discoverable
20 if it "might reasonably assist a party in *evaluating* the case, *preparing* for trial,
21 or *facilitating* settlement." (*Gonzalez v. Superior Court* (1995) 33 Cal.App.4th 1539, 1546.)
22 Admissibility is not the test. Rather, absent privilege, information is discoverable so long as it might
23 "reasonably lead to admissible evidence." (*Ibid.*) These rules are applied liberally in favor of
24 disclosure. (*Ibid.*)

25 Thus, "irrelevance alone is an insufficient ground to justify preventing a witness from
26 answering a question posed at a deposition," unless the questioning "reaches the point" where
27 counsel's intent is solely to "harass, annoy, embarrass, or oppress." (*Stewart v. Colonial Western*
28 *Agency, Inc.* (2001) 87 Cal.App.4th 1006, 1014–15 (*Stewart*)). When a deponent refuses to answer,

1 “the party seeking discovery may move the court for an order compelling that answer.” (Code Civ.
2 Proc., § 2025.480; see also *Unzipped Apparel, LLC v. Bader* (2007) 156 Cal.App.4th 123, 127.)

3 **III. ARGUMENT**

4 At his January 22, 2026, deposition, Kellen Gill—Cal Coast’s Chief Audit and Risk
5 Officer—refused to answer any questions specifically about his August 31, 2023 arrest and
6 subsequent guilty plea for driving under the influence with a blood alcohol content of 0.15%—
7 double the legal limit of 0.08%. Notably, the arrest occurred approximately one month after Gill
8 assumed responsibility in July 2023 for Cal Coast’s compliance, risk, and audit functions at a \$3.5
9 billion, federally-regulated state-chartered credit union serving more than 206,000 members.

10 When asked whether he disclosed the arrest or conviction to his employer, Gill stated that it
11 was “not relevant to my current employment” and then, on advice of counsel, refused to answer any
12 further questions about the incident. (Decl. of Sarah Kelly-Kilgore (Kilgore Decl.), Ex. 1 [Kellen
13 Gill Dep. Tr. (hereafter, Gill Tr.)] at pp. 225:4–7, 225:21–25, 226:2–5.) Cal Coast’s CEO, Todd
14 Lane, independently testified that Gill never informed Cal Coast’s leadership about the DUI.
15 (Kilgore Decl., Ex. 2 [Todd Lane Dep. Tr.] at p. 209:20–24.) Both the conviction itself and Gill’s
16 studied concealment of it bear directly on core issues in this case: whether Cal Coast suffers from
17 systemic compliance failures attributable to deficiencies in its leadership, culture, and
18 accountability, and whether Gill’s testimony defending Cal Coast’s compliance policies and
19 practices deserves to be credited.

20 **A. Gill’s Roles And Responsibilities**

21 Kellen Gill serves as Chief Audit and Risk Officer at Cal Coast, overseeing compliance,
22 internal audit, risk management, and legal functions. (Gill Tr. at p. 77:17–18.) Under the “Three
23 Lines of Defense” framework required by the NCUA for compliance with banking regulations, Gill
24 is independently responsible for two of the three core lines of institutional risk control: risk
25 oversight (the second line) and internal audit (the third line). (*Id.* at p. 75:6–7; see generally Kilgore
26 Decl., Ex. 3 [Gill Dep. Ex. 704].) In these roles, Gill must operate independently from the CEO, so
27 he reports directly to the Board. (Gill Tr. at p. 75:11–20.) By regulation, Gill’s responsibilities
28 should include ensuring that Cal Coast’s policies and procedures comply with governing law,

1 monitoring adherence to those policies, and maintaining an effective compliance management
2 system—including appropriate training, ongoing monitoring, and corrective actions. (*Id.* at
3 pp. 71:3–13, 71:20–22, 34:2–23, 61:14–16; see Kilgore Decl., Ex. 4 [Gill Dep. Ex. 702] at pp. 1–
4 3.)

5 In sum, Gill is responsible not only for operating the regulatory, audit, and risk-management
6 controls himself, but also for ensuring that the rest of the organization operates safely within those
7 boundaries. *He flies the compliance aircraft, he directs the air traffic around it, and he audits the*
8 *entire operation.* The role demands deep regulatory command, fierce independence, and
9 irreproachable judgment and scruple.

10 Gill’s deposition testimony sounded alarms as to his fitness. When asked to identify safety-
11 and-soundness regulations applicable to Cal Coast, Gill deflected:

- 12 • “Safety and soundness has to do with prudent balance sheet management, so I would
13 probably point you to the chief financial officer.” (Gill Tr. at p. 43:4–7.)
- 14 • “It is not my responsibility to be an expert in things like this.” (Gill Tr. at p. 40:9–11.)
- 15 • “I don’t determine what laws apply and what don’t.” (Gill Tr. at p. 54:16–18.)

16 Unable even to say whether *any* provisions of the Code of Federal Regulations apply to Cal
17 Coast, Gill could only ask what is meant by a “binding regulation.” (Gill Tr. at pp. 52:10–13, 53:1–
18 5.)

19 In short, the executive charged with overseeing Cal Coast’s risk, audit, and compliance
20 architecture vacillated between disclaiming responsibility and pleading ignorance as to the
21 regulatory standards under which he and his organization are meant to be operating.

22 **B. The Conviction and Concealment Are Relevant**

23 On August 31, 2023—approximately one month after joining Cal Coast —Gill was arrested
24 for driving under the influence. (Gill Tr. at p. 10:4; Kilgore Decl., Ex. 5 [Gill Dep. Ex. 735] at p. 1.)
25 The criminal complaint charged violations of Vehicle Code sections 23152(a) and (b), and also
26 specially alleged under section 23578 that his blood alcohol concentration was 0.15% or more—
27 nearly twice the legal limit. (Gill Dep. Ex. 735 at pp. 1–2.) Gill later pleaded guilty or no contest.
28 (*Id.* at p. 11.) The conviction is a matter of public record.

1 This conduct occurred at the very outset of Gill’s tenure as the executive responsible for
2 identifying, monitoring, and controlling institutional risk. Judgment in that role cannot be
3 compartmentalized. (Cf. *United States v. Currens*, (3d Cir. 1961) 290 F.2d 751, 771 [“It has been
4 stated time and time again that . . . man [is] an integrated personality and that he cannot be
5 compartmentalized.”].) How someone like Mr. Gill assesses risk, complies with governing rules,
6 and maintains discipline in his personal capacity is instructive as to how he will comport himself
7 along those same dimensions in his professional capacity. (Cf. *In re Lesansky* (2001) 25 Cal. 4th
8 11, 14.) Here, an individual charged with enforcing regulatory discipline and accountability across
9 a “heavily-regulated industry” (Gill Tr. at p. 223:1) demonstrated a concerning lapse in judgment
10 almost immediately upon assuming that responsibility: initially, by driving under the influence. Of
11 course, many people, too many people, have committed the same lapse—albeit without holding
12 themselves out as qualified to serve as the Chief Audit and Risk Officer for a multi-billion-dollar,
13 state-chartered financial institution. But Mr. Gill then did something that was even more
14 concerning: Long after sobering up, Mr. Gill studiously withheld from Cal Coast, including its CEO
15 and Board, all of the facts surrounding his criminal conviction and sentence as though it were
16 categorically and necessarily irrelevant to his all-important job.

17 When asked whether he disclosed the arrest or conviction to his employer, Gill stated only:
18 “[I]t is not relevant to my current employment.” (Gill Tr. at p. 225:6–7.) Faced with the
19 documentation of his arrest and conviction for a crime that would (at a bare minimum) prompt
20 questions internally and externally about his fitness to be Cal Coast’s Chief Audit and Risk Officer,
21 Gill pleaded discomfort and for that reason refused to answer any questions. (Gill Tr. at pp. 225:21–
22 226:5.) As best the record reflects, no one at Cal Coast—including CEO Lane—was informed of
23 the conviction. (Todd Lane Dep. Tr. at p. 209:20–24.)

24 That nondisclosure bespeaks institutional compliance failures. As Chief Audit and Risk
25 Officer, Gill is responsible for institutional monitoring, transparency, containment of risk, and
26 accountability to the Board and Supervisory Committee. (Gill Tr. at pp. 75:8–12, 75:17–20, 82:3–
27 7, 82:23–83:6.) His decision to withhold any and all information about his own serious infraction—
28 rather than disclose it for institutional review—bears directly on his willingness to surface

1 uncomfortable legal issues and enforce accountability even when doing so might be uncomfortable
2 for Mr. Gill himself or for others in senior leadership. That Cal Coast did not otherwise learn of it
3 demonstrates the absence of effective internal mechanisms to identify, address, or remediate
4 issues—another responsibility residing with Mr. Gill himself.

5 Beyond exposing shortcomings in Mr. Gill and his chain of command, the non-disclosure
6 also bears on Mr. Lane’s leadership style and his appetite for inputs that may be displeasing. As
7 Lane told Carolyn Kissick, SDCCU’s Chief Risk Officer—in Gill’s presence—he “run[s] a
8 dictatorship” and he does not care what *anyone* says or thinks. (Kissick Decl. ISO Opp. Ex Parte
9 App. TRO at ¶ 6.) Gill confirmed this dynamic, informing Kissick: “It doesn’t matter what I say
10 or what I think, he’s going to do what he wants to do.” (*Id.* at ¶ 7.) The NCUA identifies precisely
11 this condition—an “overly dominant manager”—as *the* primary red flag warranting heightened
12 supervisory scrutiny. (Gill Tr. at pp. 128:22–129:3; Kilgore Decl., Ex. 6 [Gill Dep. Ex. 715] at
13 p. 5.) In this sense, it is telling that Gill felt so uncomfortable sharing his arrest and conviction with
14 Mr. Lane that he concealed it *for years*. Such is a troubling but predictable byproduct of living
15 under a dictator who is “going to do what he wants to do,” cares little or nothing for compliance,
16 and cannot abide uncomfortable truths.

17 Gill’s role requires independence from the CEO, sound judgment, transparency with the
18 Board, and the willingness to call out and mitigate risk rather than accommodate or conceal it. (See
19 Gill Dep. Exs. 704, 705 & 715.) Gill’s criminal conduct, coupled with his decision to hide it from
20 the institution, refutes any notion that he functioned as an effective check on Lane’s authority or as
21 a reliable steward of Cal Coast’s compliance, risk, and audit framework.

22 Furthermore, the concealment carries independent contractual significance. The Merger
23 Agreement required Cal Coast to disclose “all pending or threatened litigation or other proceedings,
24 any existing or threatened judgment, settlement, disputed items, order or decree, other governmental
25 action or proceedings, or any other circumstances it is aware of . . . in which Cal Coast or any of its
26 *current or former officers, directors, or employees are engaged.*” (Agreement § 2.9.1) (emphasis
27 added) The Agreement defines “knowledge” to include the knowledge of any individual “presently
28 serving as . . . chief compliance officer” who is “actually aware of such fact.” (*Id.* § 1.1.13) Gill’s

1 criminal case was a proceeding involving a current senior officer—and Gill himself was necessarily
2 aware of it. Section 6.2.2 established as a closing condition that SDCCU “shall not have discovered
3 any material error, misstatement, or omission” in Cal Coast’s representations. (*Id.* § 6.2.2) Cal
4 Coast did not disclose Gill’s conviction. And Section 9.1.3 expressly permits termination for
5 “material non-disclosure.” (*Id.* § 9.1.3.) The **failure to disclose** Gill’s criminal proceeding therefore
6 bears directly on SDCCU’s contractual right to terminate and further underscores the relevance of
7 Gill’s testimony on these issues.

8 Each fact independently supports SDCCU’s defense: the conviction reflects judgment; the
9 **concealment** bears on credibility and transparency; the leadership dynamic reveals the absence of
10 effective internal checks; and the **nondisclosure** confirms a contractual breach. Gill’s arrest,
11 conviction, supposed recovery, and **brazen concealment** are more than just relevant. His accurate
12 and complete testimony on the outstanding points is indispensable to making a full and fair record.

13 C. Gill’s Credibility As A Key Witness

14 Gill is likely one of Cal Coast’s two most prominent witnesses. Cal Coast has submitted
15 several declarations from Mr. Gill in this action already. SDCCU will surely call him at any hearing
16 or trial at which witness testimony will be presented, as will Cal Coast. He was one of three
17 document custodians and one of four deponents called by SDCCU. Gill was also one of four people
18 in the room when, according to contemporaneous notes by both Ms. Kissick and SDCCU CEO
19 Teresa Campbell, Mr. Lane declared: “I run a dictatorship and I am the dictator. ... I do not care
20 what anyone says or what anyone thinks.” Yet, Gill denied that those statements were made in his
21 presence. (Gill Tr. at p. 130:21–24.) That testimony squarely conflicts with Kissick’s sworn
22 account and creates a direct credibility dispute.

23 California law expressly permits consideration of a witness’s character for truthfulness.
24 (*People v. Bell* (2019) 7 Cal.5th 70, 106, citing Evid. Code § 780, subd. (e).) A felony DUI
25 constitutes a crime of moral turpitude for purposes of impeachment. (*People v. Diaz* (2022) 76
26 Cal.App.5th 102, 111.) And although Gill pled guilty to a misdemeanor, California courts have held
27 that misdemeanor misconduct is likewise admissible for impeachment so long as it involves moral
28 turpitude. (*People v. Woodruff* (2018) 5 Cal.5th 697, 763.) Separately, evidence that a witness

1 concealed information from those he was obligated to inform also bears directly on character for
2 truthfulness. Gill's conviction and his decision to conceal it from Cal Coast's leadership and
3 governance bodies go directly to whether his testimony regarding compliance, leadership, and
4 institutional accountability should be credited.

5 **D. Alternatively, an Adverse Inference Can and Should Be Drawn**

6 Finally, absent compulsion and compliance, this Court should draw an adverse inference
7 about Mr. Gill's answers and the facts they would reveal. There is already every indication that
8 Mr. Gill made a calculated decision to withhold from Cal Coast and everyone there all of the facts
9 surrounding his DUI arrest, conviction and sentence. Likewise, there is every indication that Cal
10 Coast as an institution took no steps to require or even encourage the reporting of such developments
11 by or surrounding its senior officers. And given that Mr. Gill's arrest occurred on a working
12 Thursday (August 31, 2023), it is fair to infer, absent contrary testimony, that he had consumed the
13 excess alcohol at a Cal Coast event and then driven away from it.

14 Assuming Mr. Gill continues to withhold from SDCCU his sworn testimony on these points,
15 this Court has overwhelming basis in law, fairness, and common sense to draw the natural adverse
16 inferences. (See Code Civ. Proc., § 2023.030, subd. (b) [authorizing sanction "ordering that
17 designated facts shall be taken as established in the action in accordance with the claim of the party
18 adversely affected by the discovery process"]; Evid. Code, § 413 [Court may consider party's failure
19 to produce relevant evidence when drawing inferences from the record]; see also *Stewart, supra*, 87
20 Cal.App.4th at p. 1014 [irrelevance alone is not basis for instructing a witness not to answer];
21 *Sinaiko Healthcare Consulting, Inc. v. Pac. Healthcare Consultants* (2007) 148 Cal.App.4th 390,
22 404–05 [misuse of discovery include an "unmeritorious objection" and "making an evasive
23 response"].) In no event should Cal Coast be able to spin its way past these revelations while
24 Mr. Gill continues to withhold answers to the questions posed to him.

25 **IV. CONCLUSION**

26 Cal Coast should be compelled to produce its Chief Audit and Risk Officer, Kellen Gill, to
27 answer basic questions regarding his August 31, 2023 arrest and subsequent conviction, sentence,
28

1 and disclosure (or lack thereof), and, absent compliance, this Court should draw all appropriate
2 adverse inferences.

3 Dated: January 26, 2026

HOLLAND & KNIGHT LLP

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5
6 By: 

Sarah Kelly-Kilgore
Amir A. Shakoorian
Zachary J. Watson

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