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7 Attorneys for Defendant,
8 **HECTOR MANUAL GARCIA [DOE 1]**

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **COUNTY OF KERN, NORTH DIVISION - DELANO**
11 **LIMITED [UNDER \$25K]**

12 GLORIA MONDRAGON,

13 Plaintiff,

14 vs.

15 CINDY GARCIA, and DOES 1 TO 25,
16 Inclusive

17 Defendants.

) CASE NO.: **D-1503-CL-14392**
) Case assigned for all purposes to:

) **DEFENDANT HECTOR GARCIA'S**
) **NOTICE OF MOTION AND MOTION**
) **TO DISMISS AND REQUEST FOR**
) **SANCTIONS AGAINST PLAINTIFF**
) **GLORIA MONDRAGON and HER**
) **ATTORNEYS DULIO CHAVEZ and**
) **MILLER & CHAVEZ, LLP PURSUANT**
) **TO CODE OF CIVIL PROCEDURE**
) **SECTION 128.5; DECLARATION OF**
) **SHERYL LEE REEVES**

) SANCTIONS SOUGHT: \$3,426.64

) **[Filed Concurrently with Proposed Order]**

) **Date: July 29, 2016**
) **Time: 8:30 a.m.**
) **Hon. Robert S. Tafoya**

) Date Complaint Filed: January 10, 2014