

1 Jeffrey Wittenberg, Esq. (SBN 250688)
 2 WITTENBERG LAW, APC
 3 2665 Main Street, Suite 240B
 4 Santa Monica, California 90405
 5 Telephone: (310) 295-2010
 6 Facsimile: (877) 352-2011
 7 E-mail: jeffrey@wittenberglawyers.com
 8 Attorneys for Plaintiff ISABELLE GAUTHIER

FILED
 Superior Court of California
 County of Los Angeles

JAN 29 2016

Sherri R. Carter, Executive Officer/Clerk
 By Natasha Rose, Deputy
 Natasha Rose

SUPERIOR COURT OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

By Fax

11 ISABELLE GAUTHIER, an individual,

12 Plaintiff,

13 vs.

14 THOMAS SCHOENBERGER, an individual;
 15 and DOES 1 to 20, inclusive,

16 Defendants.

Case No. BC564759

Assigned to the Hon. Mark Mooney, Dept. 68

**PLAINTIFF'S MEMORANDUM IN
 OPPOSITION TO DEFENDANT'S
 MOTION IN LIMINE NO. 3**

Action Filed: November 24, 2014
 FSC: February 11, 2016
 Trial Date: February 22, 2016

HEARING

Date: February 11, 2016
 Time: 8:30 a.m.
 Place: Department 68

20 Plaintiff Isabelle Gauthier respectfully submits this memorandum in opposition to Motion in
 21 Limine No. 3 filed by defendant Thomas Schoenberger. Plaintiff opposes the motion in part.
 22 Plaintiff does not oppose the motion with respect to information from the internet websites 'Ripoff
 23 Report' and 'Complaint Wire.' Plaintiff opposes the motion with respect to evidence of drug use by
 24 Defendant. With respect thereto, the Court should deny the motion.

25 Defendant refers to deposition testimony from witnesses Linda Barrett and Brian Weiner
 26 about Defendant's drug use. Mr. Weiner's deposition testimony provides no affirmative evidence of
 27 Defendant's drug use, so that testimony does not appear relevant to the issue raised by the motion.
 28 Ms. Barrett's testimony, on the other hand, includes testimony of her personal observations

02/01/2016

