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AMERICAN ENVIRONMENTAL GROUP  
7

8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF SAN BERNARDINO**  
10

11 LINDA AYRES,

12 Plaintiff(s),

13 v.

14  
15 STATE FARM GENERAL INSURANCE  
COMPANY, a Corporation; CONTRACTOR  
16 CONNECTION, a Corporation; PAUL DAVIS  
RESTORATION, INC., a Corporation;  
17 SERVPRO INDUSTRIES, INC., a Corporation;  
AMERICAN ENVIRONMENTAL GROUP, A  
18 MCLARENS COMPANY, a Corporation;  
DOES 1 through 50, inclusive,

19  
20 Defendant(s).  
21

Case No.: CIVSB2106284

*Assigned to the Hon. Bryan Foster  
Dept.S22*

**AMERICAN ENVIRONMENTAL  
GROUP'S REQUEST FOR  
PRODUCTION OF DOCUMENTS  
FROM PLAINTIFF LINDA AYRES, SET  
NINE**

Action Filed: February 22, 2021  
Trial Date: None Set

22 **PROPOUNDING PARTY:** Defendant AMERICAN ENVIRONMENTAL GROUP

23 **RESPONDING PARTY:** Plaintiff LINDA AYRES

24 **SET NO.:** Nine (9)

25 In accordance with California Code of Civil Procedure §§2033.010, you, LINDA AYRES  
26 (“YOU”) are hereby requested by Defendant AMERICAN ENVIRONMENTAL GROUP (“AEG”)  
27 to identify, individually and separately, in writing and under oath, within 30 days from the date of  
28

1 service hereof, each document, paper, book, account, letter, object or thing in YOUR possession,  
2 custody or control falling within the category of each item specified below.

3 YOU are further requested, pursuant to California Code of Civil Procedure § 2031.280, to  
4 produce and permit the inspection, and copying or photographing of each such identified document,  
5 object or thing at the offices of AEG's attorneys of record located at BOOTH LLP, 16835 W.  
6 Olympic Blvd., Suite 600E, Los Angeles, CA 90064.

7 California Code of Civil Procedure §§ 2031.210 – 2031.260 require that YOU, within thirty  
8 (303) days after service of this inspection demand, serve the original verified response to the party  
9 making the demand, including a statement that the production, inspection and related activity  
10 demanded will be allowed, either in whole in part, and that all documents or things in the demanded  
11 category which are in the possession, custody or control of that party, and to which no objection is  
12 being made, will be included in the production. Further, a representation of inability to comply with  
13 the particular demand for inspection shall affirm that a diligent search and a reasonable inquiry has  
14 been made in an effort to comply with that demand.

15 If a document or documents responsive to the following requests are withheld on the basis of  
16 privilege, YOU are further required to serve with YOUR responses, a privilege log identifying the  
17 document withheld, and the basis upon which YOU are claiming a privilege.

18 In lieu of an appearance and produce documents at the time specified, SCE will accept  
19 photocopies and duplicate prints of such documents or tangible things produced to its attorneys prior  
20 to the date set above.

### 21 **DEFINITIONS**

22 1. As used herein, the term "DOCUMENT" means any "writings" as defined in California  
23 Evidence code section 250; each "original as defined in California Evidence Code section 255; and  
24 each "duplicate" as defined in California Evidence Code section 260, including any facsimiles,  
25 electronic records, film records or production in YOUR possession or known to YOU on usual  
26 inquiry. If any writing has been prepared in more than one copy and any copy was not or is no longer  
27 identical with the original by reason of simultaneous or subsequent notation or modification of any  
28 kind, each non-identical copy must be included.

