



Linda Ayres <litigation.statefarm.aeg@gmail.com>

Re: LINDA AYRES VS STATE FARM ET AL - CIV SB 2106284 - TSC AND PRELIMINARY BAR COMPLAINTS

1 message

Hillary Booth <hbooth@boothllp.com>
To: Linda Ayres <litigation.statefarm.aeg@gmail.com>

Tue, Oct 18, 2022 at 5:36 AM

Ms. Ayres,

I do not know what you mean by "volatile conditions."

Hillary Arrow Booth
BOOTH LLP
[11835 W. Olympic Blvd., Suite 600E](#)
Los Angeles, CA 90064
310-641-1800

From: Linda Ayres <litigation.statefarm.aeg@gmail.com>
Sent: Tuesday, October 18, 2022 4:02:39 AM
To: Hillary Booth <hbooth@boothllp.com>
Cc: Linda Ayres <litigation.statefarm.aeg@gmail.com>
Subject: LINDA AYRES VS STATE FARM ET AL - CIV SB 2106284 - TSC AND PRELIMINARY BAR COMPLAINTS

Ms Booth,

I was advised not to appear in person in Court due to the volatile ongoing conditions.

I also received the most recent discovery demands.

Cordially,

Linda Ayres
In Pro Per
Disabled American Boomer Female Policy Holder
Linda Ayres vs State Farm et al
CIV SB 2106284
PO BOX 835
Yucca Valley CA 92286

----- Forwarded message -----

From: **Linda Ayres** <lindaayres311@gmail.com>
Date: Tue, Oct 18, 2022 at 3:54 AM
Subject: LINDA AYRES VS STATE FARM ET AL - CIV SB 2106284 - TSC AND PRELIMINARY BAR COMPLAINTS
To: Dominique Tomaino <dtomaino@plawp.com>, Michael McGuire <MMcGuire@plawp.com>, John Meno <jmeno@plawp.com>, <bfogarty@plawp.com>, German Marcucci <german.marcucci@ropers.com>, Sicari, Dominique <dominique.sicari@ropers.com>, Dominic Campodonico <dcampodonico@grsm.com>, Gabriel Hedrick <ghedrick@grsm.com>, <litigation.statefarm.aeg@gmail.com>, Linda Ayres <lindaayres311@gmail.com>

Dear Counsel:

Attached is my TSC with 10 attachments. I will be appearing remotely, because I fear for my life, and I fear for the safety of my property. I cannot put myself in potential dangers because of AEG counsel.

I know that the Courts may have been led to believe that I'm just angry that my claim was denied. MY CLAIM WAS NOT DENIED. MY HOME WAS DESTROYED AND I WAS EXPOSED TO LIFE THREATENING POISONS, ON PURPOSE. EACH OF THE DEFENDANTS PLAYED A ROLE IN THE DEVASTATION. ONE SEEMS TO BE FUNCTIONING AS A "FIXER" IF IT WAS A MOB SCENARIO.

Attached is my TSC, and while all of you declined to meet and confer prior to this complex hearing, it appears that counsel for AEG and Contractor Connection have mistakenly advised the Court that we have "met and conferred on all subjects required by California Rules of Court, Rule 3.724"

In my October 13, 2022 email, I referenced your refusals and I made again the recommendation for a case management conference.

Late yesterday I received the Contractor Connection TSC, without email courtesy copy. I have told all of you that this is a rural area, and mail is to be sent to PO BOX 835, Yucca Valley CA 92286. I get electronic notice of delivery at the post office address.

Couriers can be sent to my home. Mail does not come to my home. There is a mail box 1/2 mile away on the street, that is not secure, where things addressed to my home may or many not be delivered.

As we saw with the vexatious 'ex-parte hearings' - AEG counsel first sent notice to a prohibited email address, and then attempted intimidation suggesting that they sent it so I received it. AEG counsel is prohibited from contacting me at my general email box, because of the extreme abuses over the course, that culminated in a vile attempt to ask the Court to violate my First Amendment Rights, in which not one of the other co-defendants objected to on behalf of our Constitution.

The mess that Booth LLP has again created with chicanery and trickery, and trying to blame me for their misconduct is unconscionable.

Late yesterday I received more abusive discovery from AEG counsel, in the same apparent pattern and practice of discovery abuse and attempts to cause extreme burdens to the Court and Co-defendants, further fulfilling their continued threats expressed in his image you have all received before:

I suggest that ask the Court to immediately schedule a Case Management Conference. I think that if AEG counsel cannot be reined in -- none of the other other defendants were ever hear by the Court since filing, due to their shenanigans and chicanery, and today's hearing is no different. It's probably the worst yet.

That they suggest I am "name calling" when calling them out for professional conduct is .. gaslighting.

I DID NOT DESTROY MY OWN HOME... STATE FARM, AEG FINISHED IT OFF, AND CONTRACTOR CONNECTION AND PAUL DAVIS RESTORATION WERE PART OF THE PROCESS. MY HOME WAS LEFT WITHOUT A ROOF FOR APPROXIMATELY 40 DAYS OF STORMS. IT WAS NEVER REMEDIATED UNTIL I PAID FOR A SECOND DEMOLITION WITH REMEDIATION A YEAR LATER. EVEN MY HOUSEHOLD GOODS WERE DESTROYED, WHICH PDR ADMITS HAVING DONE THAT WORK, WHEN THEY WERE ASSIGNED AS GENERAL CONTRACTOR, NOT PACK-OUT DUDES.

WIND PERIL... NO MATTER WHO DID IT, MY POLICY COVERED THE LOSSES. SUBROGATION WAS SUGGESTED BY RANDY BREWER, THE FIRST AND MOST CULPABLE STATE FARM ADJUSTER. ROY PAYNTER, ADJUSTER TEAM MANAGER, ALSO IN ARIZONA, PICKED UP THE COVER UP AND RAN WITH IT EVEN WITH DECEPTIONS TO THE CALIFORNIA DEPARTMENT OF INSURANCE

I also had a fall on Friday, that include head trauma, shoulder and back. I must find a way for protection by the Court or law enforcement.

I am a member of a protected class, an American with Disabilities, and I am 70 years of age, and the disability discrimination and elder financial abuse and discrimination is vile, at best. The lack of civility by AEG counsel must stop now. Last year they ran the show "like a runaway train" deceived the courts on many counts, including discovery matters, and that is on calendar again today, with requests for sanctions, when all abusive and sanctioned discovery was met.

YESTERDAY, THEY START AGAIN? WE DON'T EVEN KNOW WHICH AMENDMENT WE WILL BE WORKING ON, AND AEG COUNSEL IN THE NOR ABOUT THE TAC DUE DATE OMITTED THE ACTUAL DATE. AEG WANTS THE TAC, AND WANTS TO USE THEIR NOR DECEPTION TO GET IT RULED ON WITHOUT OBJECTIONS. THAT SOUNDS LIKE MORE COLLUSION, LIKE MUCH OF LAST YEAR WITH BLUE JEANS MEETINGS, AND MEDIATIONS, AND BREACHES OF CONFIDENTIALITY REGARDING SETTLEMENTS...

AEG counsel seems to be doing a better job than I am in pleading the RICO cause of action? Implicating everyone?

It seems that AEG counsels have backgrounds in harassment, expressed in their abuses of a self-represented plaintiff, who is also disabled and elderly.

I found it curious to find the page on the fact that AEG provides litigation support. Why would State Farm Arizona adjusters deny me the right to find an unbiased vendor, and why would State Farm replace a demand for MOLD CLEARANCE REPORT with a "baseline mold report" THEN AUTHORIZE A BUILD BACK THAT WOULD ASSUREDLY CAUSE ILLNESS AND FURTHER CONTAMINATION.

NOW, THERE'S NEW DISCOVERY DEMANDS TODAY that are palpable with rage and danger, demanding I admit I destroyed my own home??

THERE IS CLEARLY NO DEFENSE FOR THE COLLUSION BETWEEN STATE FARM AND AMERICAN ENVIRONMENTAL GROUP, and I believe the LITIGATION SUPPORT page from their website clearly illustrates that collusion, and the consequences are undeniable.

Neurological consequences are not uncommon with toxic exposure. As I advised all of you recently, there were recently 2 air samples tested inside my home and the dangerous species appear to still be in my home, although in lesser quantities.

LINDA AYRES VS STATE FARM ET AL



"WE WILL NO LONGER EXTEND THE COURTESY OF ELECTRONIC SERVICE OF DOCUMENTS " - OCTOBER 23, 2021 AT 10:33 PM - STATE FARM ASSIGNED ENVIRONMENTAL TESTING COMPANY LEGAL COUNSEL

WELL, THAT WILL CERTAINLY CONFUSE A DISABLED BOOMER PLAINTIFF WHO RELIES ON SIRI FOR ACTIVITIES OF DAILY LIVING. NICE GOING, STATE FARM. VET YOUR PREFERRED VENDORS, OR IS WINNING BY ANY MEANS NECESSARY STANDARD BEHAVIOR IN COMPLEX LITIGATION THAT INVOLVES INSURER FRAUD AND BAD FAITH?

WEAPONIZING A DISCLOSED DISABILITY, AND DISCLOSED MEDICAL RECORDS BY OPPOSING COUNSEL BORDERS ON **MORAL TURPITUDE**, IMHO.

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LINDA AYRES VS STATE FARM ET AL

CIVILITY OR LAWFARE?? DRAW YOUR OWN CONCLUSIONS
#CAHOOTS! DON'T BE LIKE JAKE!

'LITIGATING THE MARGINS'
AKA 'HOW TO K*LL SHALLOW POCKETS'

"MY SWATH OF PARALEGALS, AND EXPERTS WE PAY (FOR INSTEAD OF LOOKING ON LINKEDIN FOR FREE ONES), ARE ON STAND-BY.

THE DAY FOLLOWING EVERY DEADLINE YOU MISS WILL RESULT IN [SECRETARY] HITTING THE "SEND" BUTTON.

THE MORE YOU FAIL TO COMPLY WITH THE CODE OF CIVIL PROCEDURES, THE EVIDENCE CODE AND JUDGE [S] ORDERS, THE MORE YOU WILL LEARN ABOUT HOW THE SYSTEM WORKS.

IT WILL BE BOTH EXCITING AND EXPENSIVE FOR YOU. ACTIONS HAVE CONSEQUENCES.

YOU INTENDED TO INTERFERE WITH MY CAREER AND ABILITY TO PROVIDE FOR MY FAMILY - I HAVE ONE.

LIKE I SAID, YOU PICKED THIS FIGHT BUT I WILL END IT.

YOUR MOVE."

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CIVILITY OR LAWFARE?? DRAW YOUR OWN CONCLUSIONS
#CAHOOTS! DON'T BE LIKE JAKE!

"...SITE INSPECTION - WE ANTICIPATE AYRES WILL NOT COOPERATE OR COMPLY WITH THIS - SEE ABOVE RE MOTION PRACTICE AND POSSIBLE EVIDENTIARY SANCTIONS AND THAT IS NOT EVEN ADDRESSING THE "DESTRUCTIVE TESTING" WHICH WILL BE CONDUCTED OUT THERE."

[THAT SURE LOOKS LIKE A THREAT OF DESTRUCTIVE TESTING, DOESN'T IT?]

[LAW ENFORCEMENT HAD TO BE CALLED TO SITE INSPECTION]

"DEPOSITION - WE ANTICIPATE AYRES WILL NOT COOPERATE OR COMPLY WITH THE CODE RE DEPOSITIONS OR THE MASK MANDATES IN EFFECT - SEE ABOVE RE MOTION PRACTICE..."

[COPY OF DEPOSITION NOT PROVIDED BY COURT REPORTER TO PLAINTIFF]

LINDA AYRES VS STATE FARM ET AL

TO ENSURE MY CONFUSION AND INABILITY TO RESPOND TIMELY, LET IT BE KNOWN THAT OPPOSING COUNSEL BOMBARDED ME, IN SHEER BAD FAITH AND HARASSMENT AND ABUSE AND OPPRESSION, IF I DID THE MATH RIGHT, WITH:

317 EMAILS IN
275 DAYS (5/27/21 - 3/4/2022)
---APPROXIMATELY 1.1527 EMAILS PER DAY
---APPROXIMATELY 8.1282 EMAILS PER WEEK FOR 39 WEEKS
---APPROXIMATELY 35 EMAILS PER MONTH FOR 8 MONTHS, 29 DAYS
---MR XXX - 285 EMAILS; 127 EMAILS 5/27/21 - 11/16/21 (174 DAYS) 158 EMAILS 11/16/21-2/25/22 + SNAIL MAIL (102 DAYS
--- SECRETARY (1) 21 EMAILS, SECRETARY (2) 2 EMAILS, ASSOCIATE ATTORNEY- 3 EMAILS, MANAGING PARTNER 5 EMAILS
--- 6,600 HOURS
--- 35+ FILINGS (MOTIONS, DEMANDS, DISCOVERY, EX PARTE ETC, INSPECTIONS, DEPOSITIONS)
--- 1 DEPOSITION HAVE DATES CLEARED WITH ALL DEFENSE COUNSEL, AND NOT PLAINTIFF 1/13/2022 - AND WHEN I POSTED ON LINKEDIN, I HAD MIS- STATED THE DEPOSITION AS HAPPENING THE FOLLOWING DAY, AND MR XXX CALLED, AND I ACCEPTED THE CALL, WHEREIN HE ALERT ME THAT THE DEPOSITION WAS NOT ON WEDNESDAY, BUT THURSDAY.
--- 1 SITE INSPECTION THAT INITIALLY THREATENED EXPENSIVE INVASIVE TESTING AND THAT A REPRESENTATIVE FROM YYY WOULD BE IN ATTENDANCE; IT TURNED INTO THE FIASCO WE'LL JUST CALL "FEBRUARY 25TH" WHICH RESULTED IN ANOTHER EFFORT TO DELAY RESPONSE TO DOCUMENTS FOR PRODUCTION

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MANY OF THE EMAILS WERE FALSELY SENT UNDER PROTECTION OF RULE 1152 (?) AND ONCE THE SEPARATE EMAIL ADDRESS FOR [THE FIRM] WAS AUTHORIZED BY THE JUDGE IN VIEW OF MY NOVEMBER REQUEST FOR PROTECTION AT EX PARTE HEARING, THAT EMAIL ADDRESS WAS USED MERELY TO HARASS AND THREATEN, AND EMAIL COPIES OF DOCUMENTS SERVED WERE TERMINATED IN A FURTHER ACT OF RETALIATION AND OBFUSCATION.

ONCE EMAIL COPIES WERE RESUMED, I REQUESTED ELECTRONIC COPIES OF ALL THE PENDING DISCOVERY, WHICH WAS ALSO DENIED IN EFFORTS TO ADD TO THE HARDSHIP.

THESE ARE ALL THINGS I WOULD HAVE SAID IN COURT, HAD I BEEN ALLOWED TO PROTECT MYSELF BY SHOWING UP IN COURT AND TELLING THE JUDGE WHAT HAPPENED. THAT I DID NOT KNOW I HAD TO OBJECT IN WRITING AND MOTION TO SPEAK TO THE JUDGE IS A TRAVESTY OF JUSTICE. THAT I AM SUBJECT TO SANCTIONS AND CONTINUED AND ESCALATING ABUSES IS AWFUL.

SO, THAT WOULD BE HARD ON ANYBODY AND PARTICULARLY DISCRIMINATING AGAINST ONE WITH DISCLOSED DISABILITIES. MY DISCLOSURE OF MEDICAL RECORDS REGARDING MY DISABILITIES HAS CLEARLY BEEN USED AS A WEAPON AGAINST ME.

--
Linda Ayres
In Pro Per Plaintiff
Disabled American Female Boomer
State Farm Homeowners Policy Holder
Linda Ayres vs State Farm et al - CIV SB 2106284
Search for latest: tinyurl.com/LindaAyresVsStateFarmEtAl-BING
PO BOX 835
Yucca Valley CA 92286
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ALL NUCLEAR REACTORS LEAK ALL THE TIME, SOME MORE THAN OTHERS, ON PURPOSE.
1,946 Known Radioactive Isotopes
#DodgeTheRads