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Jim Jenal
Law Offices of
Costan, Schechter, and Seebach
1441 West Olympic Blvd.
Los Angeles, California 90015

Attorney for Defendant
Werner Sanborn

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FOR THE COUNTY OF LEMON

Riley MacLean,

Plaintiff,

v.

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CASE NO: C-627 843

**DEFENDANT'S
MEMORANDUM OF
POINTS AND**

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Werner Sanborn,

Defendant.

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**AUTHORITIES IN
OPPOSITION TO
PLAINTIFF'S
MOTION FOR
SUMMARY JUDGMENT**

Date: May 21, 1992
Time: 9:00 a.m.
Dept: 1

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MEMORANDUM OF POINTS AND AUTHORITIES
IN OPPOSITION TO MOTION FOR SUMMARY JUDGMENT

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Authorities Cited

CASES

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MEMORANDUM OF POINTS AND AUTHORITIES
IN OPPOSITION TO MOTION FOR SUMMARY JUDGMENT

I. PRELIMINARY STATEMENT

We win.

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II. STATEMENT OF FACTS

A long string of nasty acts by the other side, should make you feel that we win.

III. Argument

We win, and this is why.

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IV. CONCLUSION

I told you we win, so please grant us what we ask.