

1 LAW OFFICES OF JOHN G. WÜRM
2 JOHN G. WÜRM, State Bar No. 106475
3 27321 North Bay Road
4 Post Office Box 1875
5 Lake Arrowhead, California 92352
6 Telephone: 909/337-2557
7 Facsimile: 909/336-3697
8 jwurmlakearrowhead@gmail.com

FILED
SUPERIOR COURT OF CALIFORNIA
COUNTY OF SAN BERNARDINO
SAN BERNARDINO DISTRICT

NOV 04 2015

BY: Scott Love
SCOTT LOVE, DEPUTY

6 Attorney for Plaintiff, Arrowhead
7 Woods Architectural Committee, Inc.,
8 a California corporation

9 SUPERIOR COURT OF CALIFORNIA

10 COUNTY OF SAN BERNARDINO CENTRAL DIVISION

11)
12 ARROWHEAD WOODS)
13 ARCHITECTURAL COMMITTEE,)
14 INC., a California corporation,)

Case No: CIVDS 1400240

14 Plaintiff,

DECLARATION OF JOHN G. WURM IN
REPLY TO OPPOSITION TO
PLAINTIFF'S MOTION FOR
ATTORNEY'S FEES

15)
16 v.)
17 GEORGE D. HATT, DONNA R. HATT, and)
18 all persons unknown claiming any legal or)
19 equitable right, title, estate, lien or interest in)
20 the property described in the Complaint,)
21 named as DOES 1 to 50, inclusive)

Date: November 16, 2015
Time: 8:30 a.m.
Dept: S-37

21 Defendants.

25 I, John G. Wurm, declare as follows:
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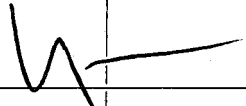
1. I am an attorney licensed to practice in the State of California, and am the attorney of record for Claimants. The matters declared to herein are within my own personal knowledge and if called to, I could completely testify thereto.

2. Attached as Exhibit "A" is a copy of the Statutory Settlement Offer served on Defendants on February 17, 2015.

I declare under penalty of perjury that the foregoing is true and correct, executed on this 2 day of November, 2015 at Lake Arrowhead, California.

DATED: November 2, 2015

THE LAW OFFICES OF JOHN G. WURM

By:  _____

JOHN G. WURM
Attorneys for Plaintiff Arrowhead
Woods Architectural Committee, Inc.,
A California corporation

EXHIBIT A

1 THE LAW OFFICES OF JOHN G. WÜRM
JOHN G. WÜRM, State Bar No. 106475
2 27321 North Bay Road
Post Office Box 1875
3 Lake Arrowhead, California 92352
Telephone: (909) 337-2557
4 Facsimile: (909) 336-3697
5 Attorney for Plaintiff, Arrowhead Woods Architectural
Committee, Inc., a California corporation
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8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 COUNTY OF SAN BERNARDINO, CENTRAL DIVISION
10

11) Case No.: CIVDS 1400240
12 ARROWHEAD WOODS)
13 ARCHITECTURAL COMMITTEE,) STATUTORY SETTLEMENT OFFER
INC., a California corporation,) (CODE OF CIVIL PROCEDURE § 998)
14)
15 Plaintiff,)
16 v.)
17)
18 GEORGE D. HATT, DONNA R. HATT, and)
all persons unknown claiming any legal or)
19 equitable right, title, estate, lien or interest in)
the property described in the Complaint,)
20 named as DOES 1 to 50, inclusive)
21 Defendants.)
22)

23 To: George D. Hatt and Donna R. Hatt
24 From: Arrowhead Woods Architectural Committee
25

26 Please take notice that pursuant to the provisions of Code of Civil Procedure section
27 998 Arrowhead Woods Architectural Committee offers to allow judgment to be taken in the
28 action pending between the parties on the following terms and conditions:

AWAC v. HATT

Page 1 of 3

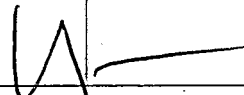
LAW OFFICES OF JOHN G. WÜRM
P.O. Box 1875, Lake Arrowhead, CA 92352
Telephone: (909) 337-2557

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1. Plaintiff Arrowhead Woods Architectural Committee shall recover from Defendants George D. Hatt and Donna R. Hatt the sum of \$7000.
2. This offer includes statutory costs to which plaintiff may be entitled.
3. Each party shall bear its own attorney fees.

Dated: 2/16, 2015

LAW OFFICES OF JOHN G. WURM

By: 
 JOHN G. WURM, Attorney for
 ARROWHEAD WOODS
 ARCHITECTURAL COMMITTEE, INC.,
 a California corporation

Proof of Acceptance

George D. Hatt and Donna R. Hatt accepts your offer to allow judgment on the terms and conditions as specified above. You may file this offer and proof of acceptance with the court clerk so that judgment may be entered accordingly.

Dated February __, 2015

George D. Hatt

Donna R. Hatt

PROOF OF SERVICE

I am employed in the County of San Bernardino, State of California. I am over the age of 18 and not a party to the within action. My business address is Post Office Box 1875, Lake Arrowhead, California, 92352.

On February 17, 2015, I caused to be served the document(s) described as: **Statutory Settlement Offer** on the interested party(ies) in this action by placing a true copy thereof enclosed in a sealed envelope and addressed as follows:

Timothy W. Brown
3890 11th St. Suite 111
Riverside, CA, 92501

BY FACSIMILE: I transmitted by facsimile machine, to the fax number indicated below, a true and correct copy of the document described above to counsel indicated below. The foregoing document was transmitted by facsimile transmission and the transmission was reported as completed and without error.


BY U.S. MAIL: I caused such envelope(s) to be deposited in the mail at Lake Arrowhead, California, with the postage thereon fully prepaid. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with U.S. Postal Service on that same day in the ordinary course of business. I am aware that on motion of the party(ies) served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.

BY PERSONAL SERVICE: I caused a true copy of said document(s) to be hand-delivered to the addressee(s) via a person who is not a party to this action or a California registered process server. If required, said registered process server's original proof of personal service will be filed with the court immediately upon its receipt.

BY ELECTRONIC TRANSMISSION: Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed.

STATE: I declare under penalty of perjury that the foregoing is true and correct and this document was executed on February 17, 2015 at Lake Arrowhead, California.

FEDERAL: I declare that I am employed in the office of a member of the bar of the Court at whose direction the service was made.



Tammy Herrera

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PROOF OF SERVICE

I am employed in the County of San Bernardino, State of California. I am over the age of 18 and not a party to the within action. My business address is Post Office Box 1875, Lake Arrowhead, California 92352.

On November 3, 2015 2015, I caused to be served the document(s) described as:
DECLARATION OF JOHN G. WURM IN REPLY TO OPPOSITION TO PLAINTIFF'S MOTION FOR ATTORNEY'S FEES on the interested party(ies) in this action by placing a true copy thereof enclosed in a sealed envelope and addressed as follows:

Timothy W. Brown
3890 11th St. Suite 111
Riverside, CA 92501

BY FACSIMILE: I transmitted by facsimile machine, to the fax number indicated below, a true and correct copy of the document described above to counsel indicated below. The foregoing document was transmitted by facsimile transmission and the transmission was reported as completed and without error.

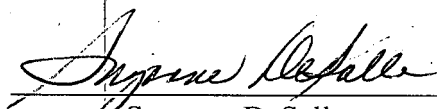
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BY PERSONAL SERVICE: I caused a true copy of said document(s) to be hand-delivered to the addressee(s) via a person who is not a party to this action or a California registered process server. If required, said registered process server's original proof of personal service will be filed with the court immediately upon its receipt.

BY ELECTRONIC TRANSMISSION: Based on a court order or an agreement of the parties to accept service by electronic transmission, I caused the documents to be sent to the persons at the electronic notification addresses listed.

STATE: I declare under penalty of perjury that the foregoing is true and correct and this document was executed on November 3, 2015 at Lake Arrowhead, California.

FEDERAL: I declare that I am employed in the office of a member of the bar of the Court at whose direction the service was made.



Suzanne DeSalle