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**FILED**  
SUPERIOR COURT OF CALIFORNIA  
COUNTY OF LOS ANGELES

JUN 30 2010

John A. [Signature] Executive Officer/Clerk  
By [Signature] Deputy  
GLORIETTA ROBINSON

Attorneys for Plaintiff, DAVID COPPEDGE

8 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**  
9 **FOR THE COUNTY OF LOS ANGELES -CENTRAL DISTRICT**

11 **DAVID COPPEDGE**, an Individual,

12 Plaintiff,

13 vs.

14 **JET PROPULSION LABORATORY**, form  
15 unknown; **CALIFORNIA INSTITUTE OF**  
16 **TECHNOLOGY**, form unknown;  
17 **GREGORY CHIN**, an Individual; **CLARK**  
18 **A. BURGESS**, an Individual; **KEVIN**  
19 **KLENK**, an Individual; and **DOES 1** through  
20 **25**, inclusive;

21 Defendants.

CASE NO.: BC435600

**OBJECTION TO DEFENDANT CALIFORNIA INSTITUTE OF TECHNOLOGY'S NOTICE OF DEPOSITION OF TAKING ORAL DEPOSITION OF PLAINTIFF DAVID COPPEDGE AND REQUEST FOR PRODUCTION OF DOCUMENTS AND SEPARATELY SERVED REQUEST FOR PRODUCTION OF DOCUMENTS**

22 TO THIS HONORABLE COURT, THE DEFENDANTS AND, THEIR ATTORNEYS OF  
23 RECORD HEREIN:

24 NOTICE IS HEREBY GIVEN that Plaintiff David Coppedge objects to Defendant  
25 California Institute of Technology's ("Caltech") Notice Of Deposition Of Taking Oral  
26

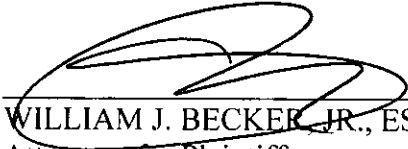
1 Deposition Of Plaintiff David Coppedge And Request For Production Of Documents and  
2 separately served Request For Production Of Documents on the following grounds:

- 3 1. The document requests seek 152 responses and therefore place an undue burden on  
4 Plaintiff, requiring him to review the requests, gather documents and prepare responses  
5 and objections in too short a period of time;
- 6 2. The number of requests constitutes unwarranted oppression, and is not justified in this  
7 case;
- 8 3. The parties will require additional time to meet and confer to resolve this dispute and  
9 have already begun the process without completing it; in fact, on June 25, 2010, counsel  
10 for the propounding party related his agreement to "work out a reasonable extension" for  
11 responses, but is presently in trial and unable to meaningfully meet and confer;
- 12 4. Neither counsel nor the witness is available to appear at a deposition on the dates  
13 scheduled;
- 14 5. No judge has been assigned to this case, making it impracticable for Defendant to move  
15 for a protective order; and
- 16 6. The document requests were served prematurely in that Caltech has not appeared in the  
17 action.  
18  
19

20 DATED: June 28, 2010

**THE BECKER LAW FIRM**

21  
22  
23 By:

  
\_\_\_\_\_  
WILLIAM J. BECKER, JR., ESQ.  
Attorneys for Plaintiff,  
DAVID COPPEDGE

1 PROOF OF SERVICE

2 STATE OF CALIFORNIA )  
3 COUNTY OF LOS ANGELES ) SS:

4 I am employed in the County of Los Angeles, State of California. I am over the age of 18  
5 and not a party to the within action; my business address is: 11500 Olympic Blvd., Suite 400,  
Los Angeles, California 90064. On June 28, 2010, I served the foregoing documents:

6 **OBJECTION TO DEFENDANT CALIFORNIA INSTITUTE OF TECHNOLOGY'S**  
7 **NOTICE OF DEPOSITION OF TAKING ORAL DEPOSITION OF PLAINTIFF DAVID**  
8 **COPPEDGE AND REQUEST FOR PRODUCTION OF DOCUMENTS AND**  
9 **SEPARATELY SERVED REQUEST FOR PRODUCTION OF DOCUMENTS**

The above-referenced document was served on:

10 James A. Zapp, Esq.  
Christine Wilson, Employment Analyst  
11 PAUL, HASTINGS, JANOFSKY &  
WALKER, LLP  
12 515 South Flower Street  
Los Angeles, CA 90071  
13 JamesZapp@paulhastings.com  
ChristineWilson@paulhastings.com

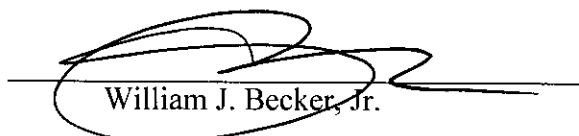
Attorneys for Defendant, **California**  
**Institute of Technology**

15  **BY U.S. MAIL:** As follows: I am "readily familiar" with the firm's practice of collection  
16 and processing correspondence for mailing. Under that practice it would be deposited with U.S.  
17 postal service on that same day with postage thereon fully prepaid at Los Angeles, California, in  
the ordinary course of business. I am aware that on motion of the party served, service is  
presumed invalid if postal cancellation date or postage meter date is more than one day after date  
of deposit for mailing in affidavit.

18  **BY E-MAIL:** I caused such document to be e-mailed to the addressees shown above as a  
19 pdf attachment.

20  (State) I declare under penalty of perjury under the laws of the State of California that  
the above is true and correct.

21 Executed on June 28, 2009, at Los Angeles, California.

22  
23   
24 William J. Becker, Jr.