

1 **WAGNER, JONES, KOPFMAN,**
2 **& ARTENIAN LLP**

3 Daniel M. Kopfman #192191
4 Laura E. Brown #306035
5 1111 E. Herndon Avenue, Suite 317
6 Fresno, California 93720
7 Office: (559) 449-1800
8 Fax: (559) 449-0749

9 *Attorneys for Plaintiffs MARISOL TOPETE and ROSALBA MALDONADO*

10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 MARISOL TOPETE and ROSALBA
13 MALDONADO,

14 Plaintiffs,

15 vs.

16 RAMOS FURNITURE; DIMAS MANUEL,
17 INC.; FURNITURE DEALS, INC.;;
18 and DOES 1-100, inclusive,

19 Defendants.

20 Case No.: 1:16-CV-00271 EPG

21 **ORDER GRANTING PLAINTIFFS’**
22 **MOTION TO COMPEL FURTHER**
23 **DISCOVERY RESPONSES**

24 The hearing on Plaintiffs MARISOL TOPETE and ROSALBA MALDONADO’s
Motion to Compel Further Discovery Responses from Defendant RAMOS FURNITURE in Case
No. 16CV00271 was heard regularly on Thursday, May 19, 2017 at 10:00 a.m. before the
Honorable Erica P. Grosjean, presiding.

Plaintiffs were represented by Daniel M. Kopfman of WAGNER JONES KOPFMAN &
ARTENIAN LLP, 1111 E. Herndon Avenue, Suite 317, Fresno, California 93720. Defendant
FURNITURE DEALS, INC. dba RAMOS FURNITURE (“RAMOS FURNITURE”) was
represented by Paul J. Bauer of SAGASER WATKINS & WIELAND PC, 750 N. Palm Avenue,
Suite 100, Fresno, California 93711.

1 Having considered the documents filed and arguments made regarding Plaintiffs' motion,
2 this Court finds good cause to GRANT Plaintiffs' request for an order compelling further
3 discovery responses from RAMOS FURNITURE.

4 Plaintiffs' motion being GRANTED, Defendant RAMOS FURNITURE is ordered to
5 serve further written responses and to produce responsive documents within 30 days of this
6 order, as follows:

7 1. In response to **Plaintiffs' Interrogatory No. 1**, Defendant must serve a
8 complete list of all individuals (including names, addresses, and telephone
9 numbers) who worked for Ramos Furniture at any time during the proposed class
10 period of 2011 through 2016, and who were not paid as required by California
11 law;

12 2. In response to **Plaintiffs' Interrogatory No. 2**, Defendant must serve a
13 complete list of all individuals (including names, addresses, and telephone
14 numbers) employed by Defendant DIMAS MANUEL, INC. at any time during
15 the proposed class period of 2011 through 2016;

16 3. In response to **Plaintiffs' Request for Production Nos. 73, 74, 77, & 78**
17 regarding the Ramos Furniture store located at 5060 N. Blackstone Avenue,
18 Fresno, California 93710 ("Blackstone" location), Defendant must serve further
19 written responses and produce all documents regarding (i) the number of persons
20 employed at the Blackstone location; (ii) the legal entity or entities who have
21 employed individuals at the Blackstone location; (iii) the time worked by each
22 person employed at the Blackstone location; and (iv) the hours worked and wages
23 paid to each person employed at the Blackstone location.

24 4. In response to **Plaintiffs' Request for Production Nos. 79, 80, 83, & 84**
regarding the Ramos Furniture store located at 4415 W. Shaw Avenue, Fresno,
California 93710 ("Shaw" location), Defendant must serve further written
responses and produce all documents regarding (i) the number of persons
employed at the Shaw location; (ii) the legal entity or entities who have employed
individuals at the Shaw location; (iii) the time worked by each person employed
at the Shaw location; and (iv) the hours worked and wages paid to each person
employed at the Shaw location.

 5. In response to **Plaintiffs' Request for Production Nos. 85, 86, 89, & 90**
regarding the Ramos Furniture store located at 1610 Howard Road, Madera,

1 California 93637 (“Madera” location), Defendant must serve further written
2 responses and produce all documents regarding (i) the number of persons
3 employed at the Madera location; (ii) the legal entity or entities who have
4 employed individuals at the Madera location; (iii) the time worked by each person
employed at the Madera location; and (iv) the hours worked and wages paid to
each person employed at the Madera location.

5 6. In response to **Plaintiffs’ Request for Production Nos. 91, 92, 95, & 96**
6 regarding the Ramos Furniture store located at 384 W. Ashlan Avenue, Clovis,
7 California 93612 (“Clovis” location), Defendant must serve further written
8 responses and produce all documents regarding (i) the number of persons
9 employed at the Clovis location; (ii) the legal entity or entities who have
employed individuals at the Clovis location; (iii) the time worked by each person
employed at the Clovis location; and (iv) the hours worked and wages paid to
each person employed at the Clovis location.

10 7. In response to **Plaintiffs’ Request for Production Nos. 97, 98, 101, &**
11 **102** regarding Ramos Furniture stores located throughout the State of California,
12 Defendant must serve further written responses and produce all documents
13 regarding (i) the number of persons employed at such locations; (ii) the legal
14 entity or entities who have employed individuals at such locations; (iii) the time
worked by each person employed at such locations; and (iv) the hours worked and
wages paid to each person employed at such locations.

15 8. In response to **Plaintiffs’ Request for Production No. 103**, Defendant
16 must serve further written response and produce all documents, electronically
stored information, and tangible things that it may use to support any of its claims
or defenses.

17 9. In response to **Plaintiffs’ Request for Production No. 104**, Defendant
18 must produce all documents signed by Plaintiff MARISOL TOPETE at any time
during her employment with Ramos Furniture.

19 10. In response to **Plaintiffs’ Request for Production No. 106**, Defendant
20 must produce Plaintiff MARISOL TOPETE’s personnel file.

21 11. In response to **Plaintiffs’ Request for Production No. 108**, Defendant
22 must serve further written response and produce all documents regarding Plaintiff
23 MARISOL TOPETE’s exemption from overtime wages while employed at
Ramos Furniture.

24 ///

