

KLINEDINST PC  
801 K STREET, SUITE 2100  
SACRAMENTO, CALIFORNIA 95814

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2 Lindsey N. Heaton, Bar No. 269688  
3 KLINEDINST PC  
4 801 K Street, Suite 2100  
5 Sacramento, California 95814  
6 (916) 444-7573/FAX (916) 444-7544  
7 [nvance@klinedinstlaw.com](mailto:nvance@klinedinstlaw.com)  
8 [lheaton@klinedinstlaw.com](mailto:lheaton@klinedinstlaw.com)

9 Attorneys for Defendants  
10 PARK PLAZA TOWERS OWNERS  
11 ASSOCIATION, JOSEPH SCHREURS,  
12 CYNTHIA SCHREURS, LADONNA  
13 HORWITZ, NYLA STARR, JULIE ROBLES,  
14 TRACY FALLON, NORMA BERLINER-  
15 SALTZ, TIM HO, DENNIS GALE, DAVID  
16 BEHLING, and BEHLING PROPERTY  
17 MANAGEMENT CORPORATION

11 UNITED STATES DISTRICT COURT  
12 NORTHERN DISTRICT OF CALIFORNIA

14 PATRICK JOHN MC ERLAIN,  
15 Plaintiff,

16 v.

17 PARK PLAZA TOWERS OWNERS  
18 ASSOCIATION, JOSEPH SCHREURS,  
19 LADONNA HORWITZ, NYLA STARR,  
20 SHERRY BERENSTEIN, JULIE  
21 ROBLES, CYNTHIA SCHREURS,  
22 TRACY FALLON, NORMA  
23 BERLINER-SALTZ, TIM HO, DENNIS  
24 GALE, DAVID BEHLING, BEHLING  
25 PROPERTY MANAGEMENT  
26 CORPORATION, a California  
27 corporation, and Does One through Fifty,

28 Defendants.

Case No. 3:13-CV-3232-MCC

**NOTICE OF SUBSTITUTION OF COUNSEL  
FOR DEFENDANTS PARK PLAZA TOWERS  
OWNERS ASSOCIATION, JOSEPH  
SCHREURS, CYNTHIA SCHREURS,  
LADONNA HORWITZ, NYLA STARR,  
JULIE ROBLES, TRACY FALLON, NORMA  
BERLINER-SALTZ, TIM HO, DENNIS  
GALE, DAVID BEHLING, AND BEHLING  
PROPERTY MANAGEMENT  
CORPORATION AND ORDER THEREON**

Courtroom: 7  
Judge: Maxine M. Chesney  
Complaint Filed: 7/16/2013  
Trial Date: 2/19/2015

26 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

27 TAKE NOTICE THAT Defendants, PARK PLAZA TOWERS OWNERS  
28 ASSOCIATION, JOSEPH SCHREURS, LADONNA HORWITZ, NYLA STARR, JULIE

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1 ROBLES, CYNTHIA SCHREURS, TRACY FALLON, NORMA BERLINER-SALTZ, TIM  
2 HO, DENNIS GALE, DAVID BEHLING, and BEHLING PROPERTY MANAGEMENT  
3 CORPORATION, hereby make the following substitution:

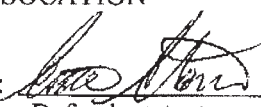
4 1. Former legal representative: Grant H. Baker, Esq., Michael B. Allen Law Group,  
5 Inc., 520 South El Camino Real, Ste. 840, San Mateo, CA 94402, (650) 347-5000 (telephone),  
6 (650) 340-6350 (facsimile), [grant@mballenlaw.com](mailto:grant@mballenlaw.com) (email); and

7 2. New legal representative: Natalie P. Vance, Esq. and Lindsey N. Heaton, Esq.,  
8 Klinedinst PC, 801 K Street, Suite 2100, Sacramento, CA 95814, (916) 444-7573 (telephone),  
9 (916) 444-7544 (facsimile), [nvance@klinedinstlaw.com](mailto:nvance@klinedinstlaw.com) (email), [lheaton@klinedinstlaw.com](mailto:lheaton@klinedinstlaw.com)  
10 (email).

11 The undersigned consent to the substitution and certify that this substitution will not  
12 delay the proceedings in this matter:

13  
14 PARK PLAZA TOWERS OWNERS  
ASSOCIATION

15 Dated: ~~June~~ <sup>July</sup>, 2014

16 By:  Steve Starr  
Defendant <sup>Ho A President</sup>

17  
18 Dated: June , 2014

19 \_\_\_\_\_  
JOSEPH SCHREURS  
20 Defendant

21  
22 Dated: June , 2014

23 \_\_\_\_\_  
LADONNA HORWITZ  
24 Defendant

25  
26 Dated: June , 2014

27 \_\_\_\_\_  
NYLA STARR  
28 Defendant

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12 delay the proceedings in this matter:

13  
14 PARK PLAZA TOWERS OWNERS  
ASSOCIATION

15 Dated: June , 2014

16 By: \_\_\_\_\_  
Defendant

17  
18 Dated: June 25, 2014

19   
20 JOSEPH SCHREURS  
Defendant

21  
22 Dated: June , 2014

23 \_\_\_\_\_  
LADONNA HORWITZ  
24 Defendant

25  
26 Dated: June , 2014

27 \_\_\_\_\_  
NYLA STARR  
28 Defendant

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1 ROBLES, CYNTHIA SCHREURS, TRACY FALLON, NORMA BERLINER-SALTZ, TIM  
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ASSOCIATION

15 Dated: June , 2014

16 By: \_\_\_\_\_

Defendant

17  
18 Dated: June , 2014

19 \_\_\_\_\_  
JOSEPH SCHREURS

20 Defendant

21  
22 Dated: June 22, 2014

23   
24 \_\_\_\_\_  
LADONNA HORWITZ

25 Defendant

26  
27 Dated: June 21, 2014

28   
\_\_\_\_\_

NYLA STARR

Defendant

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Dated: June , 2014

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JULIE ROBLES  
Defendant

Dated: June 25, 2014



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CYNTHIA SCHREURS  
Defendant

Dated: June , 2014

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TRACY FALLON  
Defendant

Dated: June , 2014

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NORMA BERLINER-SALTZ  
Defendant

Dated: June , 2014

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TIM HO  
Defendant

Dated: June , 2014

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DENNIS GALE  
Defendant

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///

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Dated: June , 2014

  
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JULIE ROBLES  
Defendant

Dated: June , 2014

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CYNTHIA SCHREURS  
Defendant

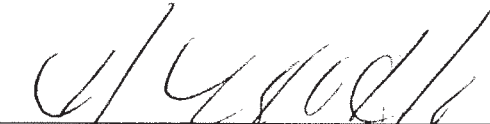
Dated: June , 2014

  
\_\_\_\_\_  
TRACY FALLON  
Defendant


Dated: June 23 , 2014

  
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NORMA BERLINER-SALTZ  
Defendant

Dated: June , 2014

  
\_\_\_\_\_  
TIM HO  
Defendant

Dated: June 23 , 2014

  
\_\_\_\_\_  
DENNIS GALE  
Defendant

///  
///  
///

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Dated: June 30, 2014

  
\_\_\_\_\_  
DAVID BEHLING  
Defendant

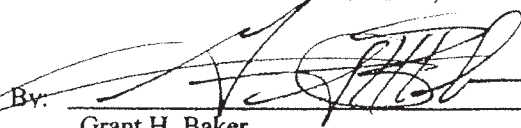
BEHLING PROPERTY MANAGEMENT  
CORPORATION

Dated: June 30, 2014

By:   
\_\_\_\_\_  
Defendant


MICHAEL B. ALLEN LAW GROUP, INC.

Dated: ~~June~~ 2, 2014  
*July*

By:   
\_\_\_\_\_  
Grant H. Baker  
Former Attorneys for Defendants  
PARK PLAZA TOWERS OWNERS  
ASSOCIATION, JOSEPH SCHREURS,  
CYNTHIA SCHREURS, LADONNA  
HORWITZ, NYLA STARR, JULIE  
ROBLES, TRACY FALLON, NORMA  
BERLINER-SALTZ, TIM HO, DENNIS  
GALE, DAVID BEHLING, BEHLING  
PROPERTY MANAGEMENT  
CORPORATION


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Dated: June , 2014

By:   
\_\_\_\_\_  
Natalie P. Vance  
Lindsey N. Heaton  
New Attorneys for Defendants  
PARK PLAZA TOWERS OWNERS  
ASSOCIATION, JOSEPH SCHREURS,  
CYNTHIA SCHREURS, LADONNA  
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ROBLES, TRACY FALLON, NORMA  
BERLINER-SALTZ, TIM HO, DENNIS  
GALE, DAVID BEHLING, BEHLING  
PROPERTY MANAGEMENT  
CORPORATION

1 IT IS SO ORDERED, provided, however, that the substitution shall not, by itself,  
2 constitute good cause to modify the dates and deadlines in the Pretrial Preparation Order.

3 Dated: July 7, 2014

4   
5 The Honorable Maxine M. Chesney  
6 United States District Judge

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