

AUG 25 2015

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12 Attorney for Defendant
13 GEORGIA DEFILIPPO

FILED
AUG 25 2015
CLERK OF THE SUPERIOR COURT
COUNTY OF STANISLAUS
BY *Debra J. Beer* DEPUTY

14 SUPERIOR COURT OF CALIFORNIA
15 COUNTY OF STANISLAUS

16 PEOPLE OF THE STATE OF CALIFORNIA, Case No. 1490969

17 Plaintiff,

18 vs.

MOTION FOR JUDICIAL NOTICE RE:
EXHIBITS TO MOTION TO RECUSE
DISTRICT ATTORNEY

19 GEORGIA DEFILIPPO,

20 Defendant.

21 TO THE ABOVE-ENTITLED COURT AND TO THE DISTRICT ATTORNEY FOR
22 THE COUNTY OF STANISLAUS:

23 COMES NOW Defendant, GEORGIA DEFILIPPO, through counsel, and moves this
24 Court to take judicial notice of the following exhibits, lodged in support of her Motion to Recuse
25 the District Attorney, pursuant to California Evidence Code sections 451-453, inclusive:

- 26 1. The Court is requested to take judicial notice of the publication of the newspaper
27 articles attached to Ms. DeFelippo's Motion to Recuse as Exhibit A, Exhibit C,
28 and Exhibit E, not for the truth of the matters asserted therein, but for the fact of
publication.
- 2. The Court is requested to take judicial notice of the Order attached as Exhibit B,


Handwritten initials

1 filed in United States District Court for the Eastern District of California
2 Sacramento Division, Document No. 202, filed 4/4/13, in Case No. 10-cr-175.

- 3 3. The Court is requested to take judicial notice of the Declaration of Judge Steffan,
4 attached as Exhibit D, referenced in the "Notice and Order to Show Cause Re:
5 Contempt" filed on 3/3/15, in Stanislaus County Superior Court No. 1492610.
- 6 4. The Court is requested to take judicial notice of the Petition for Writ of Mandate,
7 filed in the Fifth District Court of Appeal, Case No. Case No. F071739, attached
8 as Exhibit E, and the Response to the Alternate Writ issued by the Court of
9 Appeal on July 17, 2015, attached as Exhibit G.
- 10 5. The Court is requested to take judicial notice of the Motion to Disqualify filed by
11 Praveen Singh, in Stanislaus County Superior Court Case Nos. 1465156 and
12 1466071, attached as Exhibit H, and Exhibit A thereto, Complaint, United States
13 District Court for the Eastern District of California (Document No. 1, Case No.
14 15-cv-00646).
- 15 6. The Court is requested to take judicial notice of the Complaint filed in Case No.
16 15-cv-311 as Document No. 1, attached as Exhibit I.

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18 Dated: August 24, 2015

Respectfully Submitted,

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20 TIM A. PORI
21 Attorney for Defendant
22 GEORGIA DEFILIPPO
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1 **PROOF OF SERVICE**

2 I declare under penalty of perjury that:

3 I am a citizen of the United States and am employed in the County of Stanislaus. I am
4 over the age of eighteen years and not a party to the within action. My business address is as
5 follows: 811 15th Street, Modesto, CA 95354.

6 On the date set forth below, I caused the attached **MOTION FOR JUDICIAL NOTICE**
7 **RE: EXHIBIT TO MOTION TO RECUSE THE DISTRICT ATTORNEY** to be served on
8 the parties to this action as follows:

9 BY MAIL-

10 I placed a true copy thereof, enclosed in a sealed envelope with postage thereon fully
11 prepaid, in the United States mail at Modesto, California, addressed to the parties as set
12 forth on the attached service list. C.C.P. §§1013 (a), 2015.5.

13 BY FEDERAL EXPRESS

14 I retained Federal Express to personally serve a true copy thereof on _____ on the parties
15 as set forth on the attached service list. C.C.P. §§1013 (c), 2015.5.

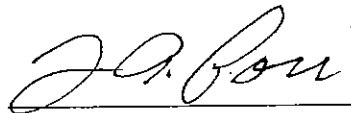
16 BY FACSIMILE TRANSMISSION-

17 I am readily familiar with this law firm's business practices for collection and processing
18 of documents by way of facsimile. I telefaxed a true copy thereof at said facsimile
19 number (s) as set forth on the attached service list. C.C.P. §§1013 (e), 2015.5 and C.R.C.
20 §2008.

21 BY PERSONAL SERVICE- to the Stanislaus County District Attorney

22 I personally served a true copy thereof on the parties as set forth on the attached service
23 list to 832 12th Street, Modesto, CA. C.C.P. §§1011, 2015.5.

24 Executed on August 25, 2015 at Modesto, California.

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1 **Re: People of the State of California v. Georgia Carson, aka Georgia DeFilippo**

2 STANISLAUS County Superior Court Case No.: 1490969

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SERVICE LIST

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7 Stanislaus County District Attorney

832 12th Street, Suite 300

8 P. O. Box 442

Modesto, CA 95353

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