

ORIGINAL

FILED

JAN 14 2016

CLERK OF THE SUPERIOR COURT  
COUNTY OF STANISLAUS

BY *Ana Valencia*

1 GARCIA, SCHNAYERSON & THOMPSON  
ATTORNEYS AT LAW  
2 225 West Winton Avenue, Suite 208  
Hayward, California 94544  
3 Telephone: (510) 887-7445

4 JESSE J. GARCIA (CSBN 61223)  
Counsel for Defendant  
5 GEORGIA DEFILIPPO

6 SUPERIOR COURT OF THE STATE OF CALIFORNIA

7 IN AND FOR THE COUNTY OF STANISLAUS

8 PEOPLE OF THE STATE OF CALIFORNIA,

9 Plaintiff,

) CASE NO. 1490969

10 vs.

) NOTICE OF MOTION AND  
) MOTION TO JOIN CO-DEFENDANT CARSON'S  
) MOTION TO BAR RELEASE CONSIDERATION  
) AND REVIEW OF ANY TAX RECORDS  
) SUBPOENAED AND OBJECTION TO ANY  
) RELEASE, CONSIDERATION, REVIEW, OR  
) EXAMINATION THEREOF

11 GEORGIA DEFILIPPO,

14 Defendant.

) *Date/Time: TBA*

16 TO: THE CLERK OF THE ABOVE-ENTITLED COURT AND THE DISTRICT  
17 ATTORNEY OF STANISLAUS COUNTY:

18 PLEASE TAKE NOTICE that Defendant Georgia Defilippo hereby joins her co-defendant

19 **Frank Carson's Motion to Bar Release Consideration and Review of Any Tax Records**

20 **Subpoenaed and Objection to Any Release, Consideration, Review, or Examination Thereof.**

21 DATED: 1/12/16

22 Respectfully submitted,  
GARCIA, SCHNAYERSON & THOMPSON

23 *[Handwritten Signature]*

24 JESSE J. GARCIA  
25 Attorney for Defendant  
26 GEORGIA DEFILIPPO

*Rec'd 1-14-16 cgy*

GARCIA, SCHNAYERSON & THOMPSON

Attorneys at Law  
225 W. Winton Avenue, Suite 208  
Hayward, CA. 94544-1219

Re: **People vs. Frank Carson, et al**  
**Case no.: 1490969**

**PROOF OF SERVICE BY MAIL**

I am a resident of the aforesaid County, I am over the age of eighteen years and not a party to the within entitled action. My business address is 225 West Winton Avenue, Suite 208, Hayward, California 94544.

On **January 14** 2016, I served a true copy of the following:

- **NOTICE OF MOTION AND MOTION TO JOIN CO-DEFENDANT CARSON'S MOTION TO BAR RELEASE CONSIDERATION AND REVIEW OF ANY TAX RECORDS SUBPOENAED AND OBJECTION TO ANY RELEASE, CONSIDERATION, REVIEW, OR EXAMINATION THEREOF**

on the parties listed on the attached service list, by placing a true copy thereof enclosed in a mail envelope with postage thereon fully prepaid, in the United States Mail in the City of Hayward, State of California.

- **SEE ATTACHED SERVICE LIST**

I declare under penalty of perjury that the foregoing is true and correct and that this document was executed this **14<sup>th</sup>** day of **January 2016**, in the City of Hayward, State of California.

  
\_\_\_\_\_  
CLAUDIA BEJARANO

SERVICE LIST

Deputy District Attorney  
County of Stanislaus  
832-12th Street, Suite 300  
Modesto, CA 95354  
Telephone: (209) 525-5550  
Facsimile: (209) 558-4027

Preciliano Martinez  
1120-14th Street, Suite 5  
Modesto, CA 95354  
Telephone: (209) 579-2206  
Facsimile: (209) 579-2211  
Email: [attymartinez@yahoo.com](mailto:attymartinez@yahoo.com)

Martha Carlton-Magana  
Law Offices of Magana & Carlton-Magana  
1012-11th Street, Suite 103  
Modesto, CA 95354  
Telephone: (209) 524-5616  
Facsimile: (209) 524-5312  
Email: [carltnm@hotmail.com](mailto:carltnm@hotmail.com)

Hans Hjertonsson  
Law Offices of Grisez, Orestein & Hertle  
724-10 Street  
Modesto, CA 95354  
Telephone: (209) 526-3121  
Email: [Hans.hjertonsson@gmail.com](mailto:Hans.hjertonsson@gmail.com)

Alonso J. Gradford  
Law Office of Alonzo J. Gradford  
1202 H Street, Suite C  
Modesto, CA 95354  
Telephone: (209) 408-0342  
Facsimile: (209) 408-0797  
Email: [alonzogradford924@gmail.com](mailto:alonzogradford924@gmail.com)

SERVICE LIST CONTINUED

Lawrence T. Niermeyer  
Law Offices of Moorad, Clark & Stewart  
1020-15<sup>th</sup> Street, Suite 10  
Modesto, CA 95354  
Telephone: (209) 574-9447  
Facsimile: (209) 574-9447  
Email: [Itniermeyer@aol.com](mailto:Itniermeyer@aol.com)

Robert Forkner  
722-13th Street  
Modesto, CA 95354  
Telephone: (209) 544-0200  
Facsimile: (209) 544-1860  
Email: [rforkner@forknerlaw.com](mailto:rforkner@forknerlaw.com)