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6

7 **SUPERIOR COURT OF CALIFORNIA**
8 **COUNTY OF SANTA CRUZ**
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10
11 Laurent GRANIER,
12 Plaintiff,
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14 vs.
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16 Scott STOCKER, , et al.
17 Defendants.
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Case No : CV180228

- **ANSWER and OPPOSITION to « NOTICE OF AND DEMURRER TO COMPLAINT ;**
- **MEMORANDUM OF POINTS & AUTHORITIES IN SUPPORT OF ANSWER and OPPOSITION ;**
- **EXHIBITS.**

For the hearing
Date : January 27, 2015
Time : 08:30 am
Dept. : 5

24 Attorney representing Defendants Scott STOCKER, DE LAVEAGA MOTORS Inc., Joey MOCCIA
25 and Andrew WHITMAN :
26 Christopher E. SCHUMB (CSBN 116828)
27 10 Almaden Blvd Ste 1250
28 San Jose, CA 95113
29

30 TO EACH PARTY AND TO THE COUNSEL OF RECORD FOR EACH PARTY :
31 PLEASE TAKE NOTICE that the present answer will pleaded on January 27, 2015 regarding the
32 « NOTICE OF AND DEMURRER TO COMPLAINT, MEMORANDUM OF POINTS &
33 AUTHORITIES IN SUPPORT OF DEMURRER » written, claimed and filed by the attorneys of
34 Defendants Scott STOCKER, DE LAVEAGA MOTORS Inc., Joey MOCCIA and Andrew
35 WHITMAN,
36 signed the 17th of november 2014 by Christopher E. SCHUMB.
37 For the hearing of the 27th of january 2014, 08:30 am, dept. 5.
38

39 The motion and demurrer presented by the adverse party is based on lies, fake allegations,
40 perjuries, in order to deprive Plaintiff of his Civil Rights, and to put him in a worse situation than
41 he is yet, being a double victim, which will give to defendants more room to blackmail him.
42 The motion and demurrer is not supported by any proof.
43 But the present answer and opposition demonstrates the absolute dishonesty of the adverse party
44 by a proof of one of their lies, about their consideration on the so-called unintelligible plaintiff's
45 complaint, which is really quite the opposite nature, thanks to two honest and fair persons who
46 testified about (exhibit 1 and 2). Otherwise, the dishonesty of defendants is also shown by the
47 contract of consignment (exhibit 3) which is under strict laws which are not respected by
48 defendants. And more, the dishonesty of defendants is also shown by the excessive price (exhibit
49 4) asked by defendants, almost the double than the one asked by Plaintiff. Instead of this,

1 defendants took advantage on Plaintiff, who has not his car since several months, even knowing
2 where it is since then. Time works for defendants, Plaintiff being deprived of his property.
3

4 Conclusion.

5 Motion and demurrer of the adverse party can not be granted, and defendants have to pay for the
6 damages they caused and are causing to Plaintiff by their abuse of process.
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8 The 12th of January 2015,

9 Laurent GRANIER, Plaintiff, self-represented
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1 **MEMORANDUM OF POINTS & AUTHORITIES IN SUPPORT**
2 **of ANSWER and OPPOSITION**

3 **Preamble.**

4 The main problem came from the unlawful and dishonest behaviour and act of Scott STOCKER,
5 owner and manager of « DE LAVEAGA Motors Inc. » located in Santa Cuz.

6 About Andrew WHITMAN and Joey MOCCIA, their last behaviour is to be united, together as
7 one, with Scott STOCKER, despite the fact they are sued on different levels of responsibility and
8 cause. A response quite the opposite of honest people, of people having made a mistake, or not
9 knowing the « activities » of Scott STOCKER. It is difficult to understand how a car dealer selling
10 common cars, is able to pay the rental of a nice and great store, the salary of several employees, tax,
11 insurance, and by the same time, has a one million dollars house, an expensive Ferrari, and can pay a
12 brand new PORSCHE GT3 of \$200.000...

13 It is difficult to explain that the collaboration between Scott STOCKER, Andrew WHITMAN and
14 Joey MOCCIA is limited only to a normal business of a car dealer, when we know yet that Andrew
15 WHITMAN has a flight license...

16 Indeed, if Andrew WHITMAN and Joey MOCCIA were honest, they could easily show their good
17 faith by being apart from Scott STOCKER in this lawsuit, instead to show a new demonstration of
18 their full collusion for a criminal act.

19 The main and interesting question is : Why all those defendants are together as one with Scott
20 STOCKER if they were not deeply involved in his business ?

21 If Plaintiff was wrong, Scott STOCKER would have nothing to fear, and his friends, Andrew
22 WHITMAN and Joey MOCCIA would have nothing to fear too for him.

23 There are two reasons for their unlawful behaviour. First, because Scott STOCKER is guilty, and
24 those defendants know it. And second, because they have something to lose if Scott STOCKER has
25 legal troubles in his business, and something else to win if Scott STOCKER has no trouble in his
26 business. In one word : COLLUSION.

27 All the behaviours of those defendants, even their last one with their kind of defense by demurrers
28 based on false, fake and wrong allegations, together as one against Plaintiff, is for the benefit of the
29 main responsible, Scott STOCKER, as he was a normal guy. He is not. Scott STOCKER is a real
30 criminal, not because he screwed, blackmailed and lied to Plaintiff, and stole his car, but because he
31 has criminal and arrest records, because he is part of the local mob, because he is close, even the
32 right-hand man of the local mob boss, Bruce CANEPA, who owns the building of « De LAVEAGA
33 Motors Inc. »... A criminal organization which “worked” and works in an organized trafficking of
34 stolen car, associated with a laundering money for other « extra » activities, with the help of a
35 corruption network made of some persons in some administrations... And Scott J. STOCKER is not
36 the only one criminal in his family, his brother has the same « abilities » and « skills ». And many
37 other close and/or relative persons, too.

38 Anyway, the answer of those persons by their demurrer based on false, wrong, fake and
39 incomplete argumentation, demonstrates without any doubt the corruption of authorities, and so, the
40 federal jurisdiction applies.

41 In addition, regarding the involvement of a criminal person being a part of a mob, a criminal
42 organization, the federal jurisdiction applies.

43
44 **DEMONSTRATION OF NULLITY**

45 **1. ANSWERS about the « DEMURRER » pleaded by Defendants :**

- 46 • *About the demurrers for the first, second, third, fourth, fifth, sixth, seventh, eighth, ninth*
47 *and tenth causes of action claimed under the same point considering « fails to state facts*
48 *sufficient to constitute a cause of action and is unintelligible » :*

49 **Answer from Plaintiff :**

1 1. This affirmative defense is not enough explicit and accurate to be kept and considered as an
2 essential and indisputable point for a demurrer.

3 2. Regarding corruption and organized trafficking, federal laws have to be considered. So, no
4 one demurrer can be considered on this point.

5 3. The fact that the attorney of defendants considers the pleadings concerning their clients, as
6 « *unintelligible* » is only based on his own limits of abilities for interpretation and understanding,
7 within the limits of his education, his culture, his honesty, his intelligence.

8 In anyway but in case of mental health or mental deficiency, a defendant or his attorney can not
9 claim such a demurrer.

10 If a defendant does not get the intellectual ability and/or the legal knowledge, or even not enough,
11 he has the right to be helped and represented by an attorney. The fact for a defendant to choose a
12 moron, or a stupid, or a dishonest, or simply an attorney limited by his own intellectual ability and/or
13 legal knowledge, can not be a claim for a demurrer, because the choice is under the only
14 responsibility of the defendant.

15 If the defendant's representative, attorney or anyone else, admits his own intellectual limits, and/or
16 legal knowledge ones, defendant has just to change of representative.

17 The fact that a defendant or plaintiff representative, an attorney/lawyer, expresses his own lack of
18 intelligence and/or knowledge in legal can not be a claim for any demurrer.

19 In addition, and it is important, if the causes of action are « *unintelligible* », why defendants
20 and/or defendant's representative claim this point for nullity, because in this case if it was true, it is in
21 their only favor, and so, none of them has anything to fear in a court, and in front of a jury...

22 So, no one demurrer can be considered on this point.

- 23
- 24 • *About the demurrers for the eleventh cause of Action claimed by the same point*
25 *considering « fails to state facts sufficient to constitute a cause of action and is*
26 *unintelligible and fails to state whether the alleged contract is written, is oral or implied by*
27 *conduct » :*

28 **Answer from Plaintiff :**

29 1. This affirmative defense is not enough explicit and accurate to be kept and considered as an
30 essential and indisputable point for a demurrer.

31 The fact that the attorney of defendants considers the pleadings concerning their clients, as
32 « *unintelligible* » is only based on his own limits of abilities for interpretation and understanding,
33 within the limits of his education, his culture, his honesty, his intelligence.

34 In anyway but in case of mental health or mental deficiency, a defendant or his attorney can not
35 claim such a demurrer.

36 If a defendant does not get the intellectual ability and/or the legal knowledge, or even not enough, he
37 has the right to be helped and represented by an attorney. The fact for a defendant to choose a moron,
38 or a stupid, or a dishonest, or simply an attorney limited by his own intellectual ability and/or legal
39 knowledge, can not be a claim for a demurrer, because the choice is under the only responsibility of
40 the defendant.

41 If the defendant's representative, attorney or anyone else, admits his own intellectual limits, and/or
42 legal knowledge ones, defendant has just to change of representative.

43 The fact that a defendant or plaintiff representative, an attorney/lawyer, expresses his own lack of
44 intelligence and/or knowledge in legal can not be a claim for any demurrer.

45 In addition, and it is important, if the causes of action are « *unintelligible* », why defendants and/or
46 defendant's representative claim this point for nullity, because in this case if it was true, it is in their
47 only favor, and so, none of them has anything to fear in a court, and in front of a jury...

48 So, no one demurrer can be considered on this point.

- 49 3. About the contract :

1 Anyway, the so-called contract, signed by Plaintiff with the so-called company « De
2 LAVEAGA Motors Inc. » under the responsibility of Scott STOCKER, is, without the
3 shadow of doubt, null and void by its nature. The contract of consignment is presented under
4 the exhibit 3 which is under strict laws which are not respected by defendants. So,
5 Defendants are against the Law, and against « Department of Motor Vehicles » (DMV) laws,
6 which has the duty of the regulation of car dealers, and especially about « consignment »
7 cases.. Instead of this, defendants took advantage on Plaintiff, who has not his car since
8 several months, even knowing where it is since then. Time works for defendants, Plaintiff
9 being deprived of his property. So, like Scott STOCKER committed deliberately serious
10 offenses about the contract, no one demurrer can be considered on this point.
11

12 **2. ANSWERS about « MEMORANDUM OF POINTS and AUTHORITIES » :**

13 • *About the « Statement of Facts », paragraph « 1 » :*

14 **Answer, demurrer from Plaintiff :**

15 1. This affirmative defense is only based on fake allegations and lies, and so, it can not be kept
16 and considered as an essential and indisputable point for the use of a demurrer.

17 2. The so-called contract (exhibit 3), signed by Plaintiff with the so-called company « De
18 LAVEAGA Motors Inc. » under the responsibility of Scott STOCKER, presented by the latter, is
19 without the shadow of doubt, a contract null and void by its nature, and above all, is against the Law,
20 and against « Department of Motor Vehicles » (DMV) which has the duty of the regulation of car
21 dealers, and especially about « consignment » cases. So, like Scott STOCKER committed
22 deliberately serious offenses about the contract, no one demurrer can be considered on this point.

23 3. Plaintiff asked for his car several times before the 09th of october 2014. Scott STOCKER's
24 accomplice, Andrew WHITMAM, lied to Plaintiff, claiming he had a client wanting to buy the car,
25 and said to Plaintiff to come back later to pick up the check. Plaintiff came the 09th of october 2014
26 to pick up the car because Andrew WHITMAN revealed to him that he did not sell the car.

27 4. Scott STOCKER put the car for sale at \$35,900 (exhibit 4), so, almost the double of the price
28 asked by Plaintiff (\$20,000), and so, the fault not to have sold the car is only on the total
29 responsibility of Scott STOCKER.

30 5. Scott STOCKER never sent any mail to Plaintiff to warn him about storage fees, and let alone
31 to pick up his car.

32 6. Scott STOCCKER threatened Plaintiff when he tried to get his car back, the 10th of october
33 2014, and his criminal behaviour was the reason for what Plaintiff went to police to get help, and so,
34 discovered the corruption of local police, protecting the unlawful acts of Scott STOCCKER.

35 7. Plaintiff recorded his discussion with Andrew WHITMAN and the one with Scott
36 STOCKER.
37

38 • *About the « Legal Discussion », paragraph « 2 » :*

39 Nota bene : It is interesting to mention that Scott STOCKER's attorney and the ones of the other
40 defendants, City of SANTA CRUZ, SANTA CRUZ POLICE DEPARTMENT, Lynn ROBINSON,
41 Don LANE, Patty HAYMOND, Nathan VASQUEZ and Kevin VOGEL, are using the same
42 dishonest strategy together as one, and even the same words « *ambiguous* », « *incomprehensible* »
43 and « *unintelligible* ».

44 1. The fact that the attorney of defendants considers the pleadings concerning their clients, as
45 « *unintelligible* », or « *ambiguous* », or « *incomprehensible* », or « *indecipherable* ». is only
46 based on his own limits of abilities for interpretation and understanding, within the limits of
47 his education, his culture, his honesty, his intelligence.

48 In anyway but in case of mental health or mental deficiency, a defendant or his attorney can
49 not claim such a demurrer.

1 If a defendant does not get the intellectual ability and/or the legal knowledge, or even not
2 enough, he has the right to be helped and represented by an attorney. The fact for a defendant
3 to choose a moron, or a stupid, or a dishonest, or simply an attorney limited by his own
4 intellectual ability and/or legal knowledge, can not be a claim for a demurrer, because the
5 choice is under the only responsibility of the defendant.

6 If the defendant's representative, attorney or anyone else, admits his own intellectual limits,
7 and/or legal knowledge ones, defendant has just to change of representative.

8 The fact that a defendant or plaintiff representative, an attorney/lawyer, expresses his own
9 lack of intelligence and/or knowledge in legal can not be a claim for any demurrer.

10 In addition, and it is important, if the causes of action are « *unintelligible* », why defendants
11 and/or defendant's representative claim this point for nullity, because in this case if it was
12 true, it is in their only favor, and so, none of them has anything to fear in a court, and in front
13 of a jury...

14 So, no one demurrer can be considered on this point.

- 15 2. Even it is a proof of lack of intelligence, the fact of using a jurisprudence example and/or
16 reference, or using an article of law, does not spare the person to give an explanation, a real
17 one in order to demonstrate that the present case is perfectly the same than the one used as
18 example.

19 A quick remember about the Use of jurisprudence, legal precedents :

20 A jurisprudence is a way for a legal system to avoid officially the possibility of a situation
21 showing the ridiculous of its « mechanism » and so, the loss of its credibility, by the fact to
22 have given two different judgements, two different sentences for a same kind of case.

23 Using legal precedents is not a simple way, but has rules, even it is mainly used by
24 chimpanzees, or people having no brain, nor intelligence, nor knowledge in legal, indeed, by
25 people having none real argument to fight the adverse party. Above all, the person using legal
26 precedents, because he is not able indeed to find any real argument by himself, has to show,
27 demonstrate and prove the perfect similarity between « his » case and the one taken as
28 reference. Using legal precedents is not just like to toss a dog a bone.

29 Otherwise, we can not accept the fact that absolutely all judgements, all sentences are fair and
30 honest. In addition, a judgement from a new case can break a jurisprudence, and can become
31 a new one, replacing the prior one.

32 Defendants failed with those obligations.

33 So, no one demurrer can be considered on this point.

- 34 3. Using just the reference number of an article of Law is not an explanation.

35 In addition, using an article of Law is not a simple way, because it has rules. Even this way as
36 is, is mainly used by chimpanzees, or people having no brain, nor intelligence, nor knowledge
37 in legal, indeed, by people having none real argument to fight the adverse party, the person
38 using an article of Law has to show, demonstrate and prove this « reference » as appropriate
39 by the perfect accurate correlation between « his » case and the article of Law.

40 Using an article of Law is not just like to toss a dog a bone.

41 So, no one demurrer can considered on this point.

- 42 4. Defendants' attorney claims a Code of Civil Procedure without to be more specific about
43 which one, about the year of its publication, about its validity, about his jurisdiction – city,
44 state, country. So, no one demurrer can be considered on this point.

- 45 5. Defendants' attorney claims that Plaintiff's complaint is « *ambiguous* », « *incomprehensible* »,
46 « *unintelligible* », « *uncertain* », and even « *indecipherable* », which is a lie, a fake
47 declaration.

48 Plaintiff is only talking about honesty, justice, fairness, open-mindedness, indeed about
49 notions of high-mindedness and noble spirit, so, it is obviously normal that defendants and

1 their attorneys, being the quite opposite, can not understand, and find his declaration as
2 « *ambiguous and incomprehensible* », even « *unintelligible* ». It is only a question about their
3 own intellectual low level and lack of rectitude, and not a lack from Plaintiff. So, no one
4 demurrer can be considered on this point without to be a violation of Civil Rights.

5 Defendants' attorney does not show and demonstrate the reality about their so-called
6 consideration as « *unintelligible* ». Indeed, it seems that defendants do not know the real and
7 precise definition of this word. So, no one demurrer can be considered on this point.

8 Plaintiff's complaint is written with 11941 words, so, around 1200 sentences with an average
9 of 10 words by sentence. Defendants's attorney dares without joking, to claim that all words,
10 all the 1200 sentences are unintelligible. This is pretty impossible. But the though-minded
11 explanation shows that the problem of understanding comes only from the defendants
12 themselves, from their own limits in moral sense. So, no one demurrer can be considered on
13 this point. Otherwise, Exhibits 1 and 2 provided by Plaintiff, are two affidavits from two
14 persons who certified that the text is readable, understandable and logical.

15 6. Regarding criminal offenses, the complaint is mainly against the persons, against Scott
16 STOCKER, Andrew WHITMAN and Joey MOCCIA, and so, despite the fact that
17 Defendants's attorney demonstrates his lack of intelligence, honesty and good faith by talking
18 about « *De Laveaga Motors Inc.* » A company does not commit crime, only people. Plaintiff's
19 complaint is written under this understanding about Defendants : « *as individual, and as...* ».
20 A coma has a sense in a sentence. But, Defendants' attorney seems to have no knowledge
21 about it, and so, we can find there, the explanation why he is not able to understand the
22 subtlety of Plaintiff's complaint.

23 7. The present point concerns the claim without proof by the attorney of defendants considering
24 the pleadings concerning their clients, is « *unintelligible* », or « *ambiguous* », or
25 « *incomprehensible* », or « *indecipherable* ».

26 • It has been previously demonstrated that this point can not be considered because it is only
27 based on the claiming party's own limits of abilities for interpretation and understanding,
28 within the limits of his education, his culture, his honesty, his intelligence, and so, can not
29 prove that this allegation is true.

30 • It has been previously demonstrated that this point, even if it was true, is an advantage for the
31 defendant in a trial, and so it can not be claimed previously as a problem for his defense.

32 • **So, the present complement concerns an indisputable point in order to erase any doubt**
33 **about this question on the quality of the text of Plaintiff's complaint.**

34 **So, it is provided two testimonies, two notarized affidavits by two independants persons,**

35 1. Affidavit from Michael PALMIERI, notarized the 02nd of december, 2015

36 2. Affidavit from Bree J. SCHUETTE, notarized the 28th of november, 2014.

37 **Both declare that Plaintiff's complaint is fully readable and understandable. In**
38 **addition, it is even demonstrated, despite the allegations of the adverse party, that it**
39 **« *follows a path of logic* ».**

40 **So, it is demonstrated that the allegations of the defendant's attorney are indeed, lies, a**
41 **perjury, or at least, that they can not be accepted because wrong.**

42 43 44 CONCLUSIONS

45 In conclusion, the question, and so the answer about the validity of the complaint does not remain
46 to Defendants but to the jury.

47 No demurrer from the adverse party can be accepted without being a violation of Civil Rights, of
48 Plaintiff's civil rights.

49 This way to claim demurrers by using a single fake, false and wrong argument without any

1 demonstration, any example, is not acceptable.

2 Their only way of defense is about a single so-called technical issue which shows without any
3 doubt that defendants have no one argument about the case itself, and about their justification of their
4 unlawful behaviour. Just for this, the presence of Andrew WHITMAN and Joey MOCCIA in the case
5 is definitively justified.

6 A jury can understand what those defendants are trying to do, like a jury can understand what
7 Plaintiff claims and wrote, and this is the main priority and purpose of the complaint, and the answer
8 made by a jury will be the final proof that the complaint is not « unintelligible » nor
9 « incomprehensible ».

10 And, if it was really the case that the complaint is a total nonsense, defendants have nothing to
11 fear of a trial, and its jury. And so, Defendants and defendant's representative would have not a
12 reason to claim this point for nullity, because if it was true, it is only in their favor, their advantage,
13 and so, they could win in a court, and in front of a jury...

14 Claiming not to understand does not prove that the text is unintelligible, or incomprehensible. It
15 proves only the own intellectual limits of the person who claims this, in knowledge and/or
16 intelligence.

17 Morons always try to make believe to people they are smart by explaining simple things by an as
18 complicated as possible manner, when smart people try to say, to explain complicated things under
19 the easier way. Attorneys always use complicated ways to try to justify the money they take from
20 their clients. Plaintiff is not an attorney, he is honest, and smart.

21 When it comes Truth, only bad people need an explanation, a demonstration, which is obviously
22 useless « thanks » to their bad faith and dishonesty.

23 When it comes Truth, good people do not need an explanation, a demonstration because they are
24 able by themselves to know, to understand what is wrong, just by the facts, because their moral
25 values are anchored in their soul and heart. Plaintiff's complaint demonstrations are for those bad
26 people because Law requires to do it. If they are not able to understand, or rather, if they claim to do
27 not, it is their own problem.

28 Semantics knowledge gives the ability to understand the subtl difference between « to be » and
29 « to be considered as » which is commonly used by a simpler way under the only word « as ».

30 All defendants are completely devoid of moral sense and of moral values. It is the only reason
31 why they are not able to understand, and why they don't understand. Not because the text is
32 « unintelligible ».

33 And sure, they will not able to understand the present answer.

34 Indeed, their ridiculous way to claim this point which is a total nonsense as aforesaid, is rather an
35 absolute proof that all of them have fully understood what Plaintiff declares and claims, and so,
36 explains why they can only claim this absurd point about an unfair local law.

37 Regarding federal offenses, none city or state Law can be used as reference.

38 The question is : What have Andrew WHITMAN and Joey MOCCIA and their attorneys, to lose
39 if they were not honest ? Or to win...

40 In conclusion, their common single claim is a fanciful and ridiculous defense, which shows the
41 quite opposite of what they are trying to show and to do, and above all, the fact they have fully
42 understood the risk of a jury trial by trying to avoid it... It is the common and only way of bad
43 people.

44 And the final question is : Has Plaintiff to file a complaint at a Federal Court, and to show the
45 involvement of more people, in order to recover his civil rights, and money for only payment of all
46 damages he is suffering ?

47 To finish, the dishonesty of defendants is also shown by the contract of consignment (exhibit 3)
48 which is under strict laws which are not respected by defendants. And more, the dishonesty of
49 defendants is also shown by the excessive price (exhibit 4) asked by defendants, almost the double

1 than the one asked by Plaintiff. Instead of this, defendants took advantage on Plaintiff, who has not
2 his car since several months, even knowing where it is since then. Time works for defendants,
3 Plaintiff being deprived of his property.

4
5 **PRAYER FOR RELIEF.**

6 Plaintiff, in order to respect his Civil Rights and his request for a jury trial for which he has yet paid
7 the advance fees, requests from the Court to order and declare :

8 1. To dismiss the motion of demurrer of the adverse party because it is null and void by the fact
9 it contains numerous lacks of legality ;

10 2. To dismiss the motion of demurrer of the adverse party because it is null and void by the fact
11 it contains and it is based on deliberate fake and wrong allegations, distortion of the truth, lies and
12 perjuries ;

13 3. To dismiss the motion of demurrer of the adverse party because it is unclear, uncertain, and it
14 does not state any points by its lack of proof ;

15 4. To dismiss the motion of demurrer of the adverse party because it is a deliberate obstruction
16 of justice causing damages on Plaintiff ;

17 5. To dismiss the motion of demurrer of the adverse party because it is a deliberate abuse of
18 process causing damages on Plaintiff ;

19 6. To dismiss the motion of demurrer of the adverse party because it is a violation of Plaintiff's
20 Civil Rights to get a fair trial, to get payment for his damages ;

21 7. That Defendants have to pay to Plaintiff the sum of \$100,000 for pain and suffering ;

22 8. That Defendants have to pay to Plaintiff the sum of \$15,000 for all costs of suit incurred
23 herein; and for such other and further relief as deemed just and proper.

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25 The 12th of January 2015,

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29 Laurent GRANIER, Plaintiff, self-represented