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15 David Borges, and Loran Kelley

16 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

17 **FOR THE COUNTY OF LOS ANGELES**

18 THE PEOPLE OF THE STATE OF CALIFORNIA,

19 Plaintiffs,

20 vs.

21
22 POLYMER80, INC., a Nevada Corporation;
23 DAVID BORGES, an individual; LORAN
KELLEY, an individual,

24 Defendants.
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26
27
28

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Case No. 21STCV06257

[Related to Case No. 21STCV29196]

*[Assigned for all purposes to the Hon. Daniel
S. Murphy, Department 32]*

**DECLARATION OF MICHAEL
MARRON IN SUPPORT OF
DEFENDANTS' REQUEST FOR
JUDICIAL NOTICE**

Date: May 19, 2023
Time: 8:30 a.m.
Department: 32
Reservation ID: 305522480553

Complaint Filed: February 17, 2021
Trial Date: May 30, 2023

1 Borges, and Loran Kelley to Complaint, *People of the State of California v. Polymer80, Inc.* (Cal.
2 Super. Ct. Apr. 20, 2021) No. 21STCV06257.

3 9. Attached as **EXHIBIT G** to Defendants' RJN is a true and correct copy of Order re:
4 Demurrer to Complaint, *People of the State of California v. Polymer80, Inc.* (Cal. Super. Ct. June 7,
5 2021) No. 21STCV06257.

6 I declare under penalty of perjury under the laws of the State of California that the foregoing
7 is true and correct and that this declaration was executed on April 27, 2023, in New York City, New
8 York.

9
10 DATED: April 27, 2023

GREENSPOON MARDER LLP

11 By: 

12 MICHAEL MARRON

13 Attorney for Defendants Polymer80, Inc., David
14 Borges, and Loran Kelley

1 **PROOF OF SERVICE**

2 *The People of The State of California vs. Polymer80, Inc., David Borges, Loran Kelley*
3 *Case No. 21STCV06257*

4 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
5 **FOR THE COUNTY OF LOS ANGELES**

6 I am employed in the County of Jefferson, State of Alabama. I am over the age of eighteen
7 years and not a party to this action. My business address is 1819 5th Avenue N, Birmingham, AL
8 35203. On April 27, 2023, I served true and correct copies of the following document(s) described as
9 **DECLARATION OF MICHAEL MARRON IN SUPPORT OF DEFENDANTS’ REQUEST**
10 **FOR JUDICIAL NOTICE** on the interested parties in this action as follows:

11 **SEE ATTACHED SERVICE LIST**

12 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** Based on a court order or an
13 agreement of the parties to accept service by e-mail or electronic transmission, I caused the
14 document(s) to be sent from e-mail address clamar@bradley.com to the persons at the e-mail addresses
15 listed in the Service List. I did not receive, within a reasonable time after the transmission, any
16 electronic message or other indication that the transmission unsuccessful.

17 I declare under penalty of perjury under the laws of the State of California that the foregoing
18 is true and correct.

19 Executed on April 27, 2023 at Birmingham, Alabama.

20 */s/ W. Chadwick Lamar, Jr.*
21 _____
22 W. Chadwick Lamar, Jr.

1 **SERVICE LIST**

2 *The People of The State of California vs. Polymer80, Inc., David Borges, Loran Kelley*
3 *Case No. 21STCV06257*

4 **OFFICE OF THE LOS ANGELES CITY**
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