

1 JUSTIN E. GRAY, CA Bar No. 282452
2 jgray@foley.com
3 FOLEY & LARDNER LLP
3579 VALLEY CENTRE DRIVE, SUITE 300
4 SAN DIEGO, CALIFORNIA 92130
TELEPHONE: 858.847.6700
5 FACSIMILE: 858.792.6773

6 PAUL V. STORM (*Pro Hac Vice*)
pvstorm@foley.com
7 TERRELL R. MILLER (*Pro Hac Vice*)
tmiller@foley.com
8 J. MICHAEL THOMAS (*Pro Hac Vice*)
jmthomas@foley.com

9 FOLEY GARDERE
10 FOLEY & LARDNER LLP
2021 MCKINNEY AVENUE, SUITE 1600
11 DALLAS, TX 75201-3340
TELEPHONE: 214.999.3000
12 FACSIMILE: 214.999.4667

13 Attorneys for Defendant
ACE PARKING MANAGEMENT, INC.

14 **UNITED STATES DISTRICT COURT**
15 **SOUTHERN DISTRICT OF CALIFORNIA**

16 PARK ASSIST LLC,

17 Plaintiff,

18 v.

19 SAN DIEGO COUNTY REGIONAL
20 AIRPORT AUTHORITY AND
ACE PARKING MANAGEMENT,
21 INC.,

22 Defendants.

Case No. 3:18-cv-02068-BEN-MDD

**ACE PARKING MANAGEMENT,
INC.'S NOTICE OF MOTION AND
MOTION FOR RULE 11 SANCTIONS**

Date: April 22, 2019
Time: 10:30 a.m.
Place: Courtroom 5A
Judge: Hon. Roger T. Benitez

1 **TO THE COURT, ALL PARTIES AND THEIR ATTORNEYS OF**
2 **RECORD:**

3 PLEASE TAKE NOTICE that, if ordered by the Court, on April 22, 2019, at
4 10:30 a.m., or as otherwise ordered, the parties may be heard in Courtroom 5A of the
5 United States District Court for the Southern District of California, located at 221 West
6 Broadway, San Diego, CA 92101, before the Honorable Roger T. Benitez, where
7 Defendant Ace Parking Management, Inc. (“Ace Parking”), will, and hereby does, move
8 for sanctions pursuant to Fed. R. Civ. P. 11.

9 This Motion is based upon this Notice of Motion and the concurrently-filed
10 Memorandum of Points & Authorities, the Declaration of Justin E. Gray, the Federal
11 Rules of Civil Procedure, the Patent Local Rules, the files and records of this Court, and
12 any and all other materials submitted to the Court on or before the time of its decision on
13 this matter.

14 Pursuant to Fed. R. Civ. P. 11(c)(2), Ace Parking served a copy of this Notice of
15 Motion, the concurrently-filed Memorandum of Points & Authorities, the Declaration of
16 Justin E. Gray, and exhibits thereto, on Park Assist LLC on February 21, 2019.

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1 Dated: March 19, 2019

Respectfully submitted,

2 **FOLEY & LARDNER LLP**

3
4 /s/ Paul V. Storm

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12 FOLEY GARDERE

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16 Attorneys for Defendant

17 ACE PARKING MANAGEMENT, INC.