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10 **UNITED STATES DISTRICT COURT**

11 **CENTRAL DISTRICT OF CALIFORNIA – SOUTHERN DIVISION**

13 KEVIN MICHAEL BROPHY, JR., an
14 individual,

15 Plaintiffs,

16 v.

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 18 BELCALIS ALMANZAR aka CARDI B,
 an individual; KSR GROUP, LLC, a New
 19 York limited liability company;
 20 WASHPOPPIN, INC., a New York
 corporation; and DOES 1-20, inclusive,
 21

22 Defendants.

Case No. 8:17-cv-01885-CJC(JPRx)

**OBJECTION TO PROPOSED
JUDGMENT**

Judge: Hon. Cormac J. Carney

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TO DEFENDANTS AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Plaintiff objects to the proposed judgment as premature, because, among other things, there has been no decision on Plaintiff's request for injunctive relief. Further, Plaintiff intends to file a post-verdict motion pursuant to Fed.R.Civ.P. Rule 50 and/or Rule 59. Pursuant to Local Rule 7-3, Plaintiff's counsel will meet and confer with Defendants' counsel regarding the grounds for Plaintiff's motions, and to agree an appropriate briefing and hearing schedule prior to entry of judgment.

Dated: November 15, 2022

CAPPELLO & NOËL LLP

/s/ Lawrence J. Conlan

A Barry Cappello
Lawrence J. Conlan

Attorneys for Plaintiff