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PAUL, HASTINGS, JANOFSKY & WALKER LLP
STEPHEN L. BERRY (SB# 101576)
BRIGHAM M. CHENEY (SB# 238219)
695 Town Center Drive
Seventeenth Floor
Costa Mesa, CA 92626-1924
Telephone: (714) 668-6200
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Attorneys for Defendant
EXPERIAN INFORMATION SOLUTIONS, INC.

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT

RICHARD WARNER, individually and
on behalf of himself, the general public,
and all others similarly situated,

Plaintiffs,

vs.

EXPERIAN INFORMATION
SOLUTIONS, INC., a California
corporation, and DOES 1 through 100,
inclusive,

Defendants.

CASE NO. BC 362599

Hon. Victoria Cheney
Dept. 324

**NOTICE OF DEMURRER AND
DEMURRER TO PLAINTIFF'S
COMPLAINT**

Date: To be determined
Judge: To be determined
Dept.: To be determined

Complaint Filed: Nov. 29, 2006
Trial Date: None Set

1 TO PLAINTIFF RICHARD WARNER AND TO HIS ATTORNEYS OF RECORD,
2 ERIC M. EPSTEIN, A.P.C., UNITED EMPLOYEES LAW GROUP, P.C., AND
3 THIERMAN LAW FIRM:
4

5 PLEASE TAKE NOTICE that on a date on or after January 29, 2007, at a
6 time and at a location to be determined by the Presiding Judge at the Central Civil West
7 Courthouse of the Court, located at 600 South Commonwealth Ave., Los Angeles,
8 California, 90005, defendant Experian Information Solutions, Inc. ("Experian") will and
9 hereby does demur to the complaint of plaintiff Richard Warner pursuant to California
10 Civil Procedure Code sections 430.10(a) and (e) on the ground that each cause of action
11 asserted therein is barred by the Acknowledgement and Release Agreement executed by
12 plaintiff on June 8, 2005, which release is pleaded in the complaint (*see* Complaint, ¶ 8)
13 and attached to the complaint as Exhibit "A," and incorporated therein by reference.
14

15 This demurrer is and will be based on this notice of demurrer and demurrer;
16 the memorandum of points and authorities in support thereof filed concurrently herewith;
17 the papers and pleadings on file in this matter; and such further written and oral argument
18 as may be presented at or before the hearing on this matter.

19 DATED: January 4, 2006

PAUL, HASTINGS, JANOFSKY & WALKER LLP

21 By: 
22 STEPHEN L. BERRY

23 Attorneys for Defendant
24 EXPERIAN INFORMATION SOLUTIONS, INC.
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PROOF OF SERVICE

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STATE OF CALIFORNIA)
) ss.:
COUNTY OF ORANGE)

I am employed in the County of Orange, State of California. I am over the age of 18, and not a party to the within action. My business address is 695 Town Center Drive, Seventeenth Floor, Costa Mesa, California 92626-1924.

On January 4, 2007, I served the foregoing document(s) described as:

NOTICE OF DEMURRER AND DEMURRER TO PLAINTIFF'S COMPLAINT

on the interested parties by placing a true and correct copy thereof in a sealed envelope(s) addressed as follows:

Eric M. Epstein, Esq.
Eric M. Epstein, APC
1901 Avenue of the Stars, #1100
Los Angeles, CA 90067-6002
(T) (310) 552-5366

Mark R. Thierman, Esq.
Thierman Law Firm
7287 Lakeside Drive
Reno, NV 89511
(T) (510) 763-5700

Walter Haines, Esq.
United Employees Law Group, PC
65 Pine Avenue, #312
Long Beach, CA 90802
(T) (877) 696-8378

- VIA OVERNIGHT MAIL: VIA UPS: By delivering such document(s) to an overnight mail service or an authorized courier in a sealed envelope or package designated by the express service courier addressed to the person(s) on whom it is to be served.
- VIA U.S. MAIL: I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under that practice such sealed envelope(s) would be deposited with the U.S. Postal Service on January 4, 2007, with postage thereon fully prepaid, at Costa Mesa, California.
- VIA PERSONAL DELIVERY: I delivered to an authorized courier or driver authorized by First Legal Support Services to receive documents to be delivered on the same date. A proof of service signed by the authorized courier will be filed with the court upon request.
- VIA FACSIMILE: The facsimile was transmitted to Facsimile No. (310) 540-7588 on January 4, 2007. [Courtesy Copy]

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed on January 4, 2007, at Costa Mesa, California.



Molly Perley