

No. S224086

IN THE SUPREME COURT  
OF THE STATE OF CALIFORNIA

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SUPREME COURT  
**FILED**

AUG 03 2015

SHARON MCGILL, an individual,  
*Plaintiff and Respondent,*

Frank A. McGuire Clerk

v.

Deputy

CITIBANK, N.A.,  
*Defendant and Appellant.*

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AFTER DECISION BY THE COURT OF  
APPEAL,  
FOURTH APPELLATE DISTRICT, DIVISION  
THREE  
CASE G049838

FROM THE SUPERIOR COURT,  
COUNTY OF RIVERSIDE,  
CASE NO. RIC1109398, ASSIGNED FOR  
ALL PURPOSES  
TO JUDGE PRO TEM JOHN W. VINEYARD,  
DEPARTMENT 12

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**NOTICE OF ERRATA RE: RESPONDENT'S OPENING  
BRIEF ON THE MERITS**

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CAPSTONE LAW APC  
GLENN A. DANAS (SBN 270317)  
RYAN H. WU (SBN 222323)  
LIANA CARTER (SBN 201974)  
1840 CENTURY PARK EAST, SUITE 450  
LOS ANGELES, CA 90067  
TELEPHONE: (310) 556-4811  
FACSIMILE: (310) 943-0396  
GLENN.DANAS@CAPSTONELAWYERS.COM  
RYAN.WU@CAPSTONELAWYERS.COM  
LIANA.CARTER@CAPSTONELAWYERS.COM

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*Attorneys for Plaintiff and Respondent*  
SHARON MCGILL

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**NOTICE OF ERRATA**

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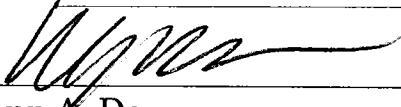
Plaintiff and Respondent, Sharon McGill, submits the attached corrected word count (page 59) to her opening brief on the merits filed July 30, 2015. The word count for the Respondent's Opening Brief on the Merits is 13,990 words, not 13,390 words.

Dated: July 31, 2015

Respectfully submitted,

Capstone Law APC

By: \_\_\_\_\_

  
Glenn A. Danas  
Ryan H. Wu  
Liana Carter

Attorneys for Plaintiff and Respondent  
SHARON MCGILL

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**ATTACHMENT**

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## CERTIFICATE OF WORD COUNT

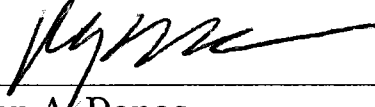
Counsel of record hereby certifies that, pursuant to the California Rules of Court, Rule 8.504(d)(1) and 8.490, the enclosed Respondent Opening Brief on the Merits was produced using 13-point Century Schoolbook type style and contains 13,990 words. In arriving at that number, counsel has used Microsoft Word's "Word Count" function.

Dated: July 31, 2015

Respectfully submitted,

Capstone Law APC

By: \_\_\_\_\_

  
Glenn A. Danas  
Ryan H. Wu  
Liana Carter

Attorneys for Plaintiff and Respondent  
SHARON MCGILL

1 **PROOF OF SERVICE**

2 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

3 I am employed in the State of California, County of Los Angeles. I am over the age of  
4 18 and not a party to the within suit; my business address is 1840 Century Park East, Suite 450,  
Los Angeles, California 90067.

5 On **July 31, 2015**, I served the document described as: **NOTICE OF ERRATA RE:**  
6 **RESPONDENT’S OPENING BRIEF ON THE MERITS** on the interested parties in this  
7 action by sending on the interested parties in this action by sending [ ] the original [or] [✓] a  
true copy thereof to interested parties as follows [or] as stated on the attached service list:

8 **See attached service list.**

9  **BY MAIL (ENCLOSED IN A SEALED ENVELOPE):** I deposited the  
10 envelope(s) for mailing in the ordinary course of business at Los Angeles,  
11 California. I am “readily familiar” with this firm’s practice of collection and  
12 processing correspondence for mailing. Under that practice, sealed envelopes  
are deposited with the U.S. Postal Service that same day in the ordinary course  
of business with postage thereon fully prepaid at Los Angeles, California.

13  **BY E-MAIL:** I hereby certify that this document was served from Los  
14 Angeles, California, by e-mail delivery on the parties listed herein at their most  
15 recent known e-mail address or e-mail of record in this action.

16  **BY FAX:** I hereby certify that this document was served from Los Angeles,  
17 California, by facsimile delivery on the parties listed herein at their most  
recent fax number of record in this action.

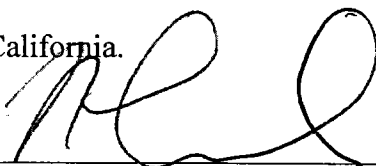
18  **BY PERSONAL SERVICE:** I personally delivered the document, enclosed  
19 in a sealed envelope, by hand to the offices of the addressee(s) named herein.

20  **BY OVERNIGHT DELIVERY:** I am “readily familiar” with this firm’s  
21 practice of collection and processing correspondence for overnight delivery.  
22 Under that practice, overnight packages are enclosed in a sealed envelope with  
a packing slip attached thereto fully prepaid. The packages are picked up by  
23 the carrier at our offices or delivered by our office to a designated collection  
site.

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

26 Executed on **July 31, 2015**, at Los Angeles, California.

27 Natalie Torbati  
28 Type or Print Name

  
Signature

**SERVICE LIST**

<p>1</p> <p>2</p> <p>3</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>26</p> <p>27</p> <p>28</p>	<p>Julia B. Strickland          Marcos D. Sasso  <b>STROOCK &amp; STROOCK &amp; LAVAN LLP</b>          2029 Century Park East, #1800          Los Angeles, CA 90067</p> <p><i>via US mail</i></p> <p>Honorable John W. Vineyard          Department 12          c/o Clerk of the Court Riverside          Superior Court Civil Department          4050 Main Street          Riverside, CA 92501</p> <p><i>via US mail</i></p> <p>The Honorable Richard M Aronson          The Honorable William F. Rylaarsdam          The Honorable David F. Thompson          c/o Clerk of the Court          California Court of Appeal          4th Appellate District Division 3          601 W. Santa Ana Blvd.          Santa Ana, California 92701</p> <p><i>via US mail</i></p> <p>Office of the District Attorney          County of Riverside          Appellate Division          3960 Orange Street          Riverside, CA 92501</p> <p><i>via US mail</i></p> <p>Appellate Coordinator          Office of the Attorney General          Consumer Law Section          300 South Spring Street          Los Angeles, CA 90013</p> <p><i>Via US mail</i></p>	<p><b>Attorneys for Defendant-Appellant          Citibank, N.A.</b></p> <p><b>Trial Court</b></p> <p><b>Court of Appeals</b></p> <p><b>Office of the District Attorney</b></p> <p>Per Cal. Rules of Court 8.29;          Business &amp; Professions Code § 17209</p> <p><b>Office of the Attorney General</b></p> <p>Per Cal. Rules of Court 8.29; Business &amp;          Professions Code § 17209</p>
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