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7 Attorneys for Defendants, THE BARBERSHOP, R.C., INC.; RICHARD
8 JAY HERNANDEZ, JR.; and BRANDEN MCREYNOLDS

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA
10 FOR THE COUNTY OF SAN BERNARDINO

11 KENDALL OLIVER,

12 Plaintiff,

13 vs.

14 THE BARBERSHOP, R.C., INC.; RICHARD
15 JAY HERNANDEZ, JR.; and BRANDEN
16 MCREYNOLDS,

17 Defendants.

Case No: CIVDS1608233
(Complaint filed on May 25, 2016)

**DEFENDANTS' ANSWER TO PLAINTIFF'S
UNVERIFIED COMPLAINT**

Trial Date: Not Assigned

18
19 COMES NOW defendants THE BARBERSHOP, R.C., INC.; RICHARD JAY HERNANDEZ,
20 JR.; and BRANDEN MCREYNOLDS and answering plaintiff's Complaint for Damages on file herein,
21 for themselves alone and for no other defendants, admits, denies and alleges as follows:

22 **GENERAL DENIAL**

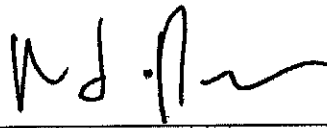
23 1. Pursuant to the provisions of Section 431.30 of the Code of Civil Procedure, this
24 answering defendant denies, generally and specifically each and every allegation contained in plaintiff's
25 Complaint, and the whole thereof, and each and every alleged cause of action thereof, and denies that
26 plaintiff sustained damages in the sum or sums alleged, or at all, by reason of any act, breach or
27 omission on the part of this answering defendant, its agents or employees.

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DATED: July 27, 2016

PACIFIC JUSTICE INSTITUTE

By: 
MICHAEL J. PEFFER, ESQ.
Attorney for Defendants, THE BARBERSHOP,
R.C., INC.; RICHARD JAY HERNANDEZ, JR.;
and BRANDEN MCREYNOLDS

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA)
3) ss.
4 COUNTY OF ORANGE)

5 I am employed in the County of Orange, State of California. I am over the age of eighteen and not a
6 party to the within action; my business address is 3843 Bristol Street, #182, Santa Ana, California
7 92704.

8 On July 27, 2016, I served the foregoing document described as **DEFENDANTS' ANSWER TO**
9 **PLAINTIFF'S FIRST AMENDED COMPLAINT**, on the interested parties by placing a true copy
10 thereof enclosed in sealed envelope(s) addressed as follows:

11 PETER C. RENN (SBN 247633)2
12 prenn@lambdalegal.org
13 LAMBDA LEGAL DEFENSE AND3
14 EDUCATION FUND, INC.
15 4221 Wilshire Boulevard, Suite 280
16 Los Angeles, California 90010-3510

KATHERINE M. FORSTER (SBN 217609)
katherine.forster@mto.com
JENNIFER L. BRYANT (SBN 293371)
jennifer.bryant@mto.com
MUNGER, TOLLES & OLSON LLP
355 South Grand Avenue, Thirty-Fifth Floor
Los Angeles, California 90071-1560

17 SUSAN L. SOMMER
18 ssommer@lambdalegal.org
19 LAMBDA LEGAL DEFENSE AND
20 EDUCATION FUND, INC.
21 9 120 Wall Street, 19th Floor
22 New York, NY 10005

23 X **BY MAIL:** I am readily familiar with the firm's practice of collection and processing of correspondence for mailing. Under
24 that practice, it would be deposited with the U.S. postal service on that same date with postage thereon fully prepaid at Los Angeles,
25 California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal
26 cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

27 **BY PERSONAL SERVICE:** I caused such envelope to be delivered by hand to the office of the addressee(s).

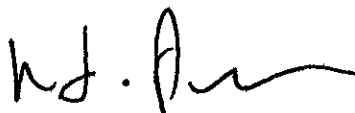
28 **BY FACSIMILE TRANSMISSION:** The facsimile machine I used complied with California Rules of Court
2003(3) and no error was reported by the machine. Pursuant to rule 2005(i), I caused the machine to print a record of the transmission, a
copy of which is attached to this proof of service.

BY FEDERAL EXPRESS: I caused the above-referenced document(s) to be delivered via Federal Express, for
delivery to the above address(es).

X (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was
made.

Executed on July 27, 2016, at Santa Ana, California.



MICHAEL PEFFER