November 2, 2007, and a copy of the "draft" motion Mr. Jerger discusses in his sanctions

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1	motion. I received this "draft" motion. The "draft" motion is about half the size of the
2	motion Mr. Jerger filed earlier this week. The "draft" motion is missing the section on Rule
3	11 sanctions. It also is missing the argument related to Civil Local Rule 7-9(a). Also
4	missing are additional sanctions that Mr. Jerger added in the motion he filed earlier this
5	week.
6	3. Mr. Jerger did not file this "draft" motion. He instead filed a greatly different 9-page
7	sanctions motion that had the additional arguments, grounds, and penalties described above.
8	It also had a number of other additions, changes, and deletions.
9	4. I never received the sanctions motion that Mr. Jerger filed, prior to Wednesday evening. I
10	have reason to believe that Mr. Jerger, although required by Rule 11 and Rule 5, never sent
11	the new sanctions motion to me.
12	5. I contacted Mr. Jerger yesterday morning and demanded that he withdraw his sanctions
13	motion because he filed a substantially different motion than the one he sent me. I told him
14	that if he did not withdraw the motion, I would be forced to take action against him. Mr.
15	Jerger did not respond.
16	6. I contacted Mr. Jerger again this morning. Again I demanded that he withdraw his
17	sanctions motion for the reasons stated above. I told him that if I did not hear from him by
18	2 p.m. Pacific time today, I would file an administrative motion to take his sanctions motion
19	off calendar for lack of service. Mr. Jerger did not respond.
20	I declare under the penalty of perjury under the laws of the State of California that the
21	foregoing is true and correct. Executed this 30th day of November, 2007, in Rockville,
22	Maryland.
23	DATED: November 30, 2007 By /s/ Victoria K. Hall, Esq. (SBN 240702)
24	LAW OFFICE OF VICTORIA K. HALL 3 Bethesda Metro Suite 700
25	Bethesda MD 20814
26	Telephone: 301-280-5925 Facsimile: 240-536-9142
27	ATTORNEY FOR PLAINTIFF

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