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I, Amber Reinhart, declare that the following facts are within my personal knowledge and I could competently testify thereto if called as a witness at trial to do so.

1. I am an assistant to the attorney of record for XXXXXX (hereinafter "XXX"), XXXXXX. at XXXXXXXXXXXX.

2. On November 5, 2020, I, on behalf of XXXXXX, attempted to contact the Court Clerk for Department 73 in the Superior Court of California, County of San Diego, Hall of Justice, at phone number (619) 450-7073 at 10:40 a.m. PST pursuant to the instructions of XXXX counsel, XXXXXX. I left a voicemail, leaving the case information, the firm phone number, and nature of the question: whether the Court requires the setting of an ex parte, regular motion, or simply a re-submit of a corrected Request for Default Judgment without filing a formal motion or setting hearings. I attempted to contact Department 73's courtroom clerk two more times before leaving for the day. Before the end of business on November 5, 2020, we received a return call from the clerk in Department 60 indicating he had received my voicemail message to set a hearing and that we had called the wrong department.

3. On November 6, 2020 I phoned the Court's business office to inquire if the court or Department 73 was experiencing phone problems. The clerk in the business office, Regina, placed me on hold and tried to reach Department 73. She advised me that she also detected a problem. She indicated that she would send a direct message to Department 73's court clerk and advise her that our office is trying to reach the department.

4. Shortly thereafter, I received a call from Andrea, who indicated she was the court clerk for Department 73. I attempted to inquire about what method the Court would require or prefer to resolve the dismissal entered. However, the clerk was upset and stressed that she did not receive a voicemail and did nothing wrong. I was not able to discuss the original question and asked if I could transfer her to the attorney of record to discuss the issue.

1 5. The only purpose I contacted the courtroom clerk was for the specific question described  
2 in paragraph two above. The only reason for my call to the business office was to identify if there  
3 were current phone connection problems after receiving a return call from a completely different  
4 department which I did not dial. A true and correct copy of my outgoing phone record is attached  
5 hereto as **Exhibit A** and incorporated herein by this reference. I did not suggest any wrongdoing on  
6 the part of any person.

7 I declare under penalty of perjury under the laws of the State of California that the foregoing  
8 is true and correct. Executed on November 10, 2020 in San Diego, California.  
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11 Amber Reinhart, Legal Assistant to  
12 XXXXXXXXXXXX.,  
13 Attorney for XXXXXXXXXXXX



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