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05/26/2021

SUPERIOR COURT OF CALIFORNIA
COUNTY OF FRESNO

To: SUPERIOR COURT-FRESNO
COUNTY: Honorable D. Tyler
Tharpe

From: Pedro Alonso-Ifil

Fax: 8444001002

Phone:

Date: 5/26/2021

Subject: CASE NO. 19CECG03480 - FREEMAN MAYS, et al. v. GREYHOUND
LINES, INC.

Comments: Spoke with Kelly Confirmed my filings are sitting in the Court's Cue awaiting
Acceptance NOTICE OF INTENT TO FILE OBJECTIONS; REMOVAL of
JUNE 21, 2021, TRIAL FROM COURT CALENDAR PROPOSED ORDER

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Plaintiff PRO SE

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF FRESNO**

FREEMAN MAYS; EDGAR
JIMENEZ; DARIO GONZALEZ;
and PEDRO ALONSO-IFIL
Plaintiffs

CASE NO. 19CECG03480

[Assigned for All Purposes to The
Honorable D. Tyler Tharpe, Dept. 501]

vs.

GREYHOUND LINES, INC.;
ASHTON RENNICK CASTILLO
and DOES 1 to 100, inclusive,
Defendants

**NOTICE OF INTENT TO FILE
OBJECTIONS; REMOVAL of
JUNE 21, 2021, TRIAL FROM
COURT CALENDAR¹**

Date: May 26, 2021

Proposed Trial Date: June 21, 2021

**PLEASE TAKE NOTICE THAT WITHOUT WAVING THE JURISDICTIONAL
and DIVERSITY ISSUES, etc.** present in this matter *in the preservation of any and all claims
asserted and/or may be asserted*, by Pedro Alonso-Ifil ("Alonso"), he does hereby NOTIFY this
Court of his intent to "OBJECT" to said Court's May 26, 2021, "**LAW AND MOTION MINUTE
ORDER**" within the time permissible and/or so provided by the Court in accordance with the
Statutes/Rules governing said matters. In support thereof, Alonso states:

¹ Boldface, Italics, Underline, and ALL Caps, etc. have been added to denote emphasis.

1. This instant filing is submitted in good faith and *is not* being submitted for ill intent – i.e. as to increase the cost of litigation, vexatious intent, threaten, intimidate, harass, coerce, nor unduly burden Defendant GREYHOUND LINES, INC. (“Greyhound”) and/or its Legal Counsel Lewis Brisbois Bisgaard & Smith LLP (“Lewis Brisbois”), etc.

2. This instant submittal is imperative to the life, safety and wellbeing, etc. of Pedro Alonso-Ifil in that Defendant Greyhound and its Legal Counsel (Lewis Brisbois) are subjecting him to unwarranted and unlawful threats, harassment, intimidation practices, and coercion, etc. efforts to force him into dismissal of any and/or all claims against them – i.e. which Alonso is refusing to do.

3. The record evidence supports that Alonso timely notified this Court of *his contesting* any alleged matters entertained in the above-styled case on May 25, 2021, by named Defendant Greyhound Lines, Inc.

4. Alonso through this instant submittal, hereby notifies the Court that **within 20 days** (on or about June 15, 2021), of his intent to submit his *OBJECTIONS*.

5. Alonso has already timely requested that the June 21, 2021, Trial Date **be removed** from this Court’s Calendar.

6. This Court has been timely notified that Alonso, intends to propound Discovery on Defendant Greyhound Lines, Inc. (“Greyhound”) in the above-styled matter. His Settlement Demands have already been served. He intends to serve Defendant Greyhound with: **(a)** *Request for Admissions*; **(b)** *Interrogatories*; and **(c)** *Request for Production of Documents*. Given the attacks already leveled at Alonso by Defendant Greyhound, a reasonable mind may conclude that the Discovery in the above-styled matter is going to extend well beyond the June 21, 2021, Trial Date that has been set.

7. In good faith, Alonso believes his **First Set** of Discovery demands to be completed and served on or before June 7, 2021.

8. Alonso’s Request for Admissions *may exceed* the required limit and require additional actions to propound responses should Defendant Greyhound object to the number of Admissions propounded.

For the above-foregoing reasons as well as those known to this Court, Alonso hereby, request that this instant **“NOTICE OF INTENT TO FILE OBJECTIONS; and REMOVAL of JUNE 21, 2021, TRIAL FROM COURT CALENDAR”** serves as evidence that this Court has been timely, properly and adequately notified of his **“CONTESTING”** of the May 25, 2021,

Hearing (i.e. which is evidenced through an NON-ATTENDANCE) and his intent to submit timely "OBJECTIONS" to this Court's May 26, 2021, Order regarding said Hearing.

PLEASE BE ADVISED: Pedro Alonso-Ifil reserves the right to amend this instant Notification should it become necessary and or may be deemed necessary to do so.

RESPECTFULLY SUBMITTED, this 26th day of May 2021.

Autograph:



Pedro Alonso-Ifil – PRO SE – UCC 1-308

COURT PROOF OF SERVICE

Freeman Mays, et al. v. Greyhound Lines, Inc., et al. Fresno County Superior Court
Case No. 19CECG03480
FOR MATTER IN THE STATE OF CALIFORNIA, COUNTY OF FRESNO

At the time of service, I am over 18 years of age and appear to be a party to this action through a STRAWMAN (PEDRO ALONSO-IFIL).

On May 26, 2021, I served a true copy (VIA EMAIL) of the following document: **NOTICE OF INTENT TO FILE OBJECTIONS; and REMOVAL of JUNE 21, 2021, TRIAL FROM COURT CALENDAR** and NOTIFIED via *Facsimile* of Court filing.

I served the document on the following persons via EMAIL as indicated on the SERVICE LIST BELOW.

I declare under Statutes/Laws governing such matters that the foregoing is true and correct.

Executed on May 26, 2021, within what is presently known as the United States of America.

RESPECTFULLY SUBMITTED, this 26th day of May 2021.

Autograph:



Pedro Alonso-Ifil – PRO SE – UCC 1-308

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DARIO GONZALEZ

Service via **EMAIL ONLY** with
NOTIFICATION of filing being sent
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Plaintiff PRO SE

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
 COUNTY OF FRESNO**

FREEMAN MAYS; EDGAR
 JIMENEZ; DARIO GONZALEZ;
 and PEDRO ALONSO-IFIL
 Plaintiffs

CASE NO. 19CECG03480

**[PROPOSED] ORDER IN
 SUPPORT OF
 NOTICE OF INTENT TO FILE
 OBJECTIONS; REMOVAL of
 JUNE 21, 2021, TRIAL FROM
 COURT CALENDAR ¹**

VS.

GREYHOUND LINES, INC.;
 ASHTON RENNICK CASTILLO
 and DOES 1 to 100, inclusive,
 Defendants

[Assigned for All Purposes to The
 Honorable D. Tyler Tharpe]

Action Filed: September 25, 2019
Proposed Trial Date: June 21, 2021

Pedro Alonso-Ifil (“Alonso), who appears to be a named PLAINTIFF in the above-styled action - without waiving any/all jurisdictional and diversity issues, etc. has presented for filing this, his,

**NOTICE OF INTENT TO FILE OBJECTIONS; REMOVAL of
 JUNE 21, 2021, TRIAL FROM COURT CALENDAR**

¹ Boldface, Italics, Underline, and ALL Caps, etc. have been added to denote emphasis.

The Court being timely advised of said NOTICE and intent and believes they have been submitted in good faith and *have not* been submitted for ill intent – i.e. as to increase the cost of litigation, vexatious intent, threaten, intimidate, harass, coerce, nor unduly burden Defendant Greyhound Lines, Inc. (“Greyhound”) and/or its Legal Counsel Lewis Brisbois Bisgaard & Smith LLP (“Lewis Brisbois”), etc.; thus, state,

IT IS HEREBY ORDERED that:

1. Pedro Alonso-Ifil has until **June 15, 2021**, to submit his OBJECTIONS to this Court’s *"LAW AND MOTION MINUTE ORDER"* docketed on or about May 26, 2021.
2. Defendant GREYHOUND LINES, INC. will not be prejudiced by this Court’s granting Alonso due course of justice to submit his OBJECTIONS.
3. The Trial Set for June 21, 2021, is hereby **REMOVED** from this Court’s Calendar.
4. That Alonso’s FIRST SET of Discovery upon Defendant GREYHOUND LINES, INC. is to be served *no later than Monday, June 7, 2021.*

IT IS SO ORDERED.

Dated: _____, 2021

Honorable D. Tyler Tharpe
Judge of the Superior Court

COURT PROOF OF SERVICE

Freeman Mays, et al. v. Greyhound Lines, Inc., et al. Fresno County Superior Court
Case No. 19CECG03480
FOR MATTER IN THE STATE OF CALIFORNIA, COUNTY OF FRESNO

At the time of service, I am over 18 years of age and appear to be a party to this action through a STRAWMAN (PEDRO ALONSO-IFIL).

On May 26, 2021, I served a true copy (VIA EMAIL) of the following document:
[PROPOSED] ORDER IN SUPPORT OF NOTICE OF INTENT TO FILE OBJECTIONS;
and REMOVAL of JUNE 21, 2021, TRIAL FROM COURT CALENDAR and NOTIFIED
via Facsimile of Court filing.

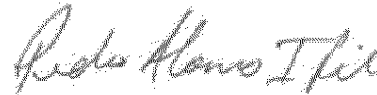
I served the document on the following persons via EMAIL as indicated on the SERVICE LIST BELOW.

I declare under Statutes/Laws governing such matters that the foregoing is true and correct.

Executed on May 26, 2021, within what is presently known as the United States of America.

RESPECTFULLY SUBMITTED, this 26th day of May 2021.

Autograph:



Pedro Alonso-Ifil – PRO SE – UCC 1-308

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