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9 ***Plaintiff***
10 ***in pro per***

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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOSEPH ZERNIK

Plaintiff

No. CV-08-01550-VAP(CW)

HON CARLA WOHRLE, JUDGE

V.

JACQUELINE CONNOR ET AL

Defendants

**REQUEST FOR JUDICIAL
NOTICE & EXHIBITS
FILED CONCURRENTLY WITH
REQUEST TO CONTINUE
HEARINGS ON MOTIONS TO
DISMISS**

DATE: MAY 6, 2008

TIME: 10:00AM

DEPT: 640

JUDGE: CARLA WOHRLE

TO ALL PARTIES AND COUNSELS OF RECORD: Plaintiff Joseph Zernik hereby files following documents with a request for Judicial Notice, pursuant to the Federal Rules of Evidence, Rule 201, of the following facts and documents in support of his Opposition to the Motions to Dismiss Complaint:

1 The recent sanctions exceeding \$16,000, and then the OSC ruling of contempt,
2 and additional sanctions of \$7,500, were for purported attempt to contact Mozilo and
3 Samuels and ask for their input on this fraudulent document.

4 The sanctions and Contempt were in and of themselves based on another
5 fraudulent document – an inexistent **July 23, 2007 Protective (gag) Order**, that was
6 never signed, never entered, never noticed, and the Court has refused in recent months
7 to produce a certified copy of such document.

8 Exhibit #2 reports the jailing and debarment of Attorney Richard Fine, former
9 Special Counsel who investigated corruption in Los Angeles City Hall, and was more
10 recently charged with “*moral turpitude*” after filing claims against Judges of the Los
11 Angeles Superior Court (**Exh p3**).

12 In Exhibit #3, March 5, 2008 Opinion, Judge Bohm states that Countrywide and
13 its lawyers

14 “*have shown a disregard for the professional and ethical obligations of the*
15 *legal profession and judicial system*’ (**Exh p8**).

16 He further asks (**Exh p71**):

17 “*Countrywide's corporate culture is no better. What kind of culture condones*
18 *blockading personnel from communicating with outside counsel? What kind of*
19 *culture discourages the checking of outside counsel's work? What kind of culture*
20 *promotes payment histories that are so confusing to the vast majority of persons,*
21 *including attorneys and judges-not to mention borrowers-that it becomes necessary*
22 *for legal assistants to "simplify" them-leading to more errors and confusion?”*

23 Judge Bohm March 5, 2008 Opinion was based in part on investigation by the
24 United States Trustee that showed similar cases in different parts of the Country.
25 Countrywide protested the lack of standing of the United States Trustee in the case.

26 Respectfully submitted,
27
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1 March 31, 2008

3 JOSEPH ZERNIK

4 

5 By: _____

6 JOSEPH ZERNIK
7 PLAINTIFF *in pro per*

8
9 **STATEMENT OF VERIFICATION OF REQUEST FOR JUDICIAL NOTICE.**

10 I, Joseph Zernik, am Defendant & Cross Complainant in *Samaan v Zernik* (SC087400)
11 matter heard in Los Angeles Superior Court, West District, I am also Appellant in *Zernik v Los*
12 *Angeles Superior Court*: (B203063), matter currently in preparation of records on appeal for
13 California Court of Appeal.

14 I have read the foregoing ***Request for Judicial Notice*** and I know the content thereof to be
15 true and correct based on my own personal knowledge as Defendant & Cross Complainant, and as
16 Appellant, except as to those matters therein stated as based upon information and belief, and as to
17 to those matters, I believe them to be true and correct as well.

18 I make this declaration that the foregoing is true and correct under penalty of perjury
19 pursuant to the laws of California and the United States.

20 Executed here in Los Angeles, County of Los Angeles, on this 31st day in March, 2008.

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24 _____
25 Joseph Zernik
26 Plaintiff
27 *in pro per*
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