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Clerk of the Superior Court
By Adriana Ive Anzalone, Deputy Clerk

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SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO

Jane Roes, et al.,

Plaintiff,

v.

Deja Vu Services, Inc., et al.,

Defendant.

Case No. 37-2018-28044-CU-OE-CTL

**DECLARATION OF JEAN CLAUDE
POMERLEAU IN SUPPORT OF
DEFENDANTS' OPPOSITION TO MOTION
TO INTERVENE**

Assigned to: Hon. Timothy Taylor

Complaint Filed: July 6, 2018

I, Jean Claude Pomerleau, declare:

1. I and have personal knowledge of all facts stated herein. If called upon as a witness, I could competently testify to the facts stated herein.

2. I am IT Director for Deja Vu Services, Inc., which previously maintained the POS system, "DV Main," the POS system that previously served some of the non-San Francisco Deja Vu-affiliated nightclubs (in 2017 and early 2018).

3. DV Main assisted its nightclubs by collecting and storing its client nightclub records, including entertainer contracts, daily records concerning entertainer performances, hours and income, and as well, assembles that information for the club's tax professionals.

4. I am trained, experienced, knowledgeable and maintained the system that performed these bookkeeping tasks of collecting and storing, and entering information into data bases, the

1 contracts, performance dates and hours, and income records for entertainers who perform at these non-
2 San Francisco Deja Vu-affiliated nightclubs: EF5 Acquisitions Group, LLC, JGMA Anaheim
3 Hospitality, Inc., and DV of LA, LLC.

4 5. As part of my role, I have access to these data bases and records.

5 6. On November 3, 2018, I was provided the following list of entertainers who were
6 identified as intervenors (hereafter "Intervenor Entertainers") in this matter, including:

7 Nichole Hughes Penny Nunez
8 Angelynn Hermes Elana Pera
9 Sara Murphy Poohrwn Mehraban Gypsey Vidal

10 7. I was requested, by counsel for Déjà vu Services, Inc. (Tammara Bokmuller), to conduct
11 a diligent, thorough and conclusive search of the records and data bases for each of the above nightclub
12 entities to determine if and when any of the Intervening Entertainers performed, including particularly
13 whether they performed during 2017 or 2018.

14 8. On November 4, 2018, I conducted a diligent, thorough and conclusive search of those
15 data bases for each of the Intervening Entertainers;

16 9. From my diligent search I determine that none of the Intervening Entertainers performed
17 at any time during 2017 or 2018 at any of the nightclubs with whom I have POS equipment placed,
18 during the time by POS system was installed.

19 10. Based on my knowledge, experience and diligent search, I can say with certainty that none
20 of Listed Entertainers held a Performer Contract OR performed at any time during 2017 or
21 2018 at ANY of the nightclubs for whom I maintain a database.

22 I declare under penalty of perjury under the laws of the State of California that the foregoing is
23 true and correct.

24 Executed on November 12, 2018 at 7:37pm.

25
26 *JC Pomerleau*

27 JEAN CLAUDE Pomerleau, Declarant