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4 Phone : 310 663 1519  
5 Plaintiff, self-represented  
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7 **SUPERIOR COURT OF CALIFORNIA**  
8 **COUNTY OF SANTA CRUZ**  
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10  
11 Laurent GRANIER,  
12 Plaintiff,  
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14 vs.  
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16 Scott STOCKER, , et al.  
17 Defendants.  
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**Case No : CV180228**

- **ANSWER and OPPOSITION**
- To « NOTICE OF AND DEMURRER TO COMPLAINT OF LAURENT GRANIER »;**
- **MEMORANDUM OF POINTS & AUTHORITIES IN SUPPORT OF ANSWER and OPPOSITION ;**
- **EXHIBITS.**

**For the hearing**  
**Date : January 27, 2015**  
**Time : 08:30 am**  
**Dept. : 5**

24 Attorneys representing Defendants City of SANTA CRUZ, SANTA CRUZ POLICE  
25 DEPARTMENT, Lynn ROBINSON, Don LANE, Patty HAYMOND, Nathan VASQUEZ and Kevin  
26 VOGEL :  
27 George J. KOVACEVICH (SBN 48125); Reed W. GALLOGLY (SBN 273573)  
28 ATCHINSON, BARISONE, CONDOTTI & KOVACEVICH  
29 A professional corporation  
30 PO Box 481  
31 Santa Cruz, CA 95061  
32

33 TO EACH PARTY AND TO THE COUNSEL OF RECORD FOR EACH PARTY :  
34 PLEASE TAKE NOTICE that the present answer will pleaded on January 27, 2015 regarding the  
35 «NOTICE OF AND DEMURRER TO COMPLAINT OF LAURENT GRANIER,  
36 MEMORANDUM OF POINTS & AUTHORITIES IN SUPPORT THEREOF » written, claimed and  
37 filed by the attorneys of Defendants City of SANTA CRUZ, SANTA CRUZ POLICE  
38 DEPARTMENT, Lynn ROBINSON, Don LANE, Patty HAYMOND, Nathan VASQUEZ and Kevin  
39 VOGEL,  
40 signed the 10<sup>th</sup> of november 2014 by Reed W. GALLOGLY.  
41 For the hearing of the 27<sup>th</sup> of january 2014, 08:30 am, dept. 5.  
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43 The motion and demurrer presented by the adverse party is based on lies, fake allegations,  
44 perjuries, in order to deprive Plaintiff of his Civil Rights, and to put him in a worse situation than  
45 he is yet, being a double victim, which will give to defendants more room to blackmail him.  
46 The motion and demurrer is not supported by any proof.  
47 But the present answer and opposition demonstrates the absolute dishonesty of the adverse party  
48 by a proof of one of their lies, about their consideration on the so-called unintelligible plaintiff's

1 complaint, which is really quite the opposite nature, thanks to two honest and fair persons who  
2 testified about (exhibit 1 and 2). Otherwise, the proof of the dishonesty of Scott STOCKER is  
3 shown by the contract of consignment (exhibit 3) which is under strict laws which are not  
4 respected by defendants. And more, the dishonesty of Scott STOCKER is also shown by the  
5 excessive price (exhibit 4) asked by him, almost the double than the one asked by Plaintiff.  
6 Instead of this, Scott STOCKER took advantage on Plaintiff, who has not his car since several  
7 months, even knowing where it is since then. Time works for Scotts STOCKER and his  
8 accomplices, Plaintiff being still deprived of his property, thanks to Defendants, the authorities  
9 who would have been able to help Plaintiff to force Scott STOCKER to respect the Law, and to  
10 recover the money of his property, or at least, his property. Those defendants refused, and are still  
11 refusing to apply and to enforce Law against Scott STOCKER.

12  
13 Conclusion.

14 Motion and demurrer of the adverse party can not be granted, and defendants have to pay for the  
15 damages they caused and are causing to Plaintiff by their abuse of process.

16  
17 The 12<sup>th</sup> of january 2015,  
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22 Laurent GRANIER, Plaintiff, self-represented  
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1 has criminal and arrest records, because he is part of the local mob, because he is close, even the  
2 right-hand man of the local mob boss, Bruce CANEPA, who owns the building of « De LAVEAGA  
3 Motors Inc. »... A criminal organization which “worked” and works in an organized trafficking of  
4 stolen car, associated with a laundering money for other « extra » activities, with the help of a  
5 corruption network made of some persons in some administrations... And Scott J. STOCKER is not  
6 the only one criminal in his family, his brother has the same « abilities » and « skills ». And many  
7 other close and/or relative persons, too.

8 All those defendants are still defending themselves by trying to be out of the lawsuit, but they do  
9 absolutely nothing, deliberately nothing against criminals, and worse, they are helping them. And in  
10 this field of activity, « Nothing is free »...

11 So, in this situation of corruption network, no claim, no demurrer can be accepted, and acceptable  
12 from those defendants. Even not the unfair article of the poor State Law about the fact that a victim  
13 has first to inform the concerned administrations and agencies before a lawsuit, because in matter of  
14 corruption, the time given to them is a won time for criminals, and a lost time for victim, who are  
15 continuing to suffer more and more. An this is against the Civil Rights of the victim.

16 City, State, Government code can not apply when it comes federal offenses.

17 Anyway, the present answer of those persons by their demurrer based on false, wrong, fake and  
18 incomplete argumentation, instead to do the right thing, to fix their mistake, demonstrates without  
19 any doubt that this step of procedure asked by California Law would have been a waste of time, and  
20 nothing would have changed the present situation, and so, would have been vain.

21 Regarding corruption of authorities, federal jurisdiction applies.

22 In addition, regarding the involvement of a criminal person being a part of a mob, a criminal  
23 organization, federal jurisdiction applies.

24 Strangely all those defendants are talking together as one but they are sued for different motives...

25 The contract of consignment is presented under the exhibit 3 which is under strict laws which are  
26 not respected by defendants. So, Defendants are against the Law, and against « Department of Motor  
27 Vehicles » (DMV) laws, which has the duty of the regulation of car dealers, and especially about  
28 « consignment » cases.. Instead of this, defendants took advantage on Plaintiff, who has not his car  
29 since several months, even knowing where it is since then. Time works for defendants, Plaintiff  
30 being deprived of his property.

## 31 32 **DEMONSTRATION OF NULLITY**

### 33 **1. ANSWERS about the « INTRODUCTION of the MEMORANDUM OF POINTS and** 34 **AUTHORITIES » pleaded by Defendants (chapter 1) :**

- 35 • *About the Claim considering « the Code of Civil Procedure section 430.10, subdivisions (e)*  
36 *and (f) » :*

#### 37 **Answer, demurrer from Plaintiff :**

38 1. This affirmative defense is not enough explicit and accurate to be kept and considered as an  
39 essential and indisputable point for a demurrer.

40 2. Regarding corruption, Federal Law has to be considered. So, no one demurrer can be  
41 considered on this point.

42 3. Regarding the use of jurisprudence, legal precedents and article of Law :

43 Using just the reference number of an article of Law is not an explanation.

44 In addition, using an article of Law is not a simple way, because it has rules. Even this way as is,  
45 is mainly used by chimpanzees, or people having no brain, nor intelligence, nor knowledge in legal,  
46 indeed, by people having none real argument to fight the adverse party, the person using an article of  
47 Law has to show, demonstrate and prove this « reference » as appropriate by the perfect accurate  
48 correlation between « his » case and the article of Law.

49 Using an article of Law is not just like to toss a dog a bone.

1 So, no one demurrer can considered on this point.

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- 3 • *About the Claim considering « failure to state facts sufficient to constitute causes of*
  - 4 *action... and the pleadings are ambiguous and unintelligible » :*

5 **Answer, demurrer from Plaintiff :**

6 1. This affirmative defense is not enough explicit and accurate to be kept and considered as an

7 essential and indisputable point for a demurrer.

8 2. The preamble is enough to demonstrate the nonsense of this point. So, no one demurrer can

9 be considered on this point.

10 3. The fact that the attorneys of defendants consider the pleadings concerning their clients, as

11 « *ambiguous and incomprehensible* » is only based on their own limits of abilities for interpretation

12 and understanding, within the limits of their education, their culture, their honesty, their moral sense,

13 their intelligence.

14 In anyway but in case of mental health or mental deficiency, a defendant or his attorney can not

15 claim such a demurrer.

16 If a defendant does not get the intellectual ability and/or the legal knowledge, or even not enough,

17 he has the right to be helped and represented by an attorney. The fact for a defendant to choose a

18 moron, or a stupid, or a dishonest, or simply an attorney limited by his own intellectual ability and/or

19 legal knowledage, can not be a claim for a demurrer, because the choice is under the only

20 responsibility of the defendant.

21 If the defendant's representative, attorney or anyone else, admits his own intellectual limits, and/or

22 legal knowledge ones, defendant has just to change of representative.

23 The fact that a defendant or plaintiff representative, as an attorney/lawyer, expresses his own lack

24 of intelligence and/or knowledge in legal can not be a claim for any demurrer.

25 In addition, and it is important, if the causes of action are « *ambiguous and incomprehensible* »,

26 why defendants and/or defendant's representatives claim this point for nullity, because in this case if

27 it was true, it is in their only favor, and so, none of them has anything to fear in a court, and in front

28 of a jury...

29 So, no one demurrer can be considered on this point.

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31 **2. ANSWERS about « ANALYSIS and ARGUMENT » pleaded by Defendants (chapter**

32 **3) :**

- 33 • *About the Claim considering the « Applicable Law : demurrer », paragraph « A » :*

34 **Answer, demurrer from Plaintiff :**

35 1. This affirmative defense is not enough explicit and accurate to be kept and considered as an

36 essential and indisputable point for the use of a demurrer.

37 2. Even it is a proof of lack of intelligence, the fact of using a jurisprudence example and/or

38 reference, or using an article of Law, does not spare the person to give an explanation, a real one in

39 order to demonstrate that the present case is perfectly the same than the one used as example.

40 A quick remember about the Use of jurisprudence, legal precedents :

41 A jurisprudence is a way for a legal system to avoid officially the possibility of a situation showing

42 the ridiculous of its « mechanism » and so, the loss of its credibility, by the fact to have given two

43 different judgements, two different sentences for a same kind of case.

44 Using legal precedents is not a simple way, but has rules, even it is mainly used by chimpanzees,

45 or people having no brain, nor intelligence, nor knowledge in legal, indeed, by people having none

46 real argument to fight the adverse party. Above all, the person using legal precedents, because he is

47 not able indeed to find any real argument by himself, has to show, demonstrate and prove the perfect

48 similarity between « his » case and the one taken as reference. Using legal precedents is not just like

49 to toss a dog a bone.

1 Otherwise, we can not accept the fact that absolutely all judgements, all sentences are fair and  
2 honest. So, in addition, a judgement from a new case can break a jurisprudence, and can become a  
3 new one, replacing the prior one.

4 Defendants failed with those obligations.

5 So, no one demurrer can be considered on this point.

6 3. Plaintiff only talks about honesty, justice, fairness, open-mindedness, honor, dignity, indeed  
7 about notions of high-mindedness and noble spirit, so, it is obviously normal that defendants and  
8 their attorneys, being the quite opposite, can not understand, and find his declarations, like any bad  
9 person, as « *ambiguous and incomprehensible* », even « *unintelligible* », . The problem is not a  
10 problem, meaning general, but only their own problem, because it is only a question about their own  
11 intellectual low level and lack of rectitude, and not a lack from Plaintiff. So, no one demurrer can be  
12 considered on this point.

13 4. Plaintiff is an inventor of 25 patents and around 40 copyrights, and above all, he is Master  
14 Philosopher and Theoretician. He wrote books about philosophy and about science, and published  
15 few of ones. He is used to develop and to analyze deeply things, more than usual, more than most of  
16 people, and so, he is able to give a complete situation of a case, in philosophy, in science, indeed in  
17 any domain, any field like legal one, because the real intelligence, and its true definition is the ability  
18 of adaptation. So, by talking at a high level of intelligence, it is obviously normal that morons can  
19 not understand and find his declarations as « *ambiguous and incomprehensible* », even  
20 « *unintelligible* ». It is only a question about their own intellectual low level, and not a lack from  
21 Plaintiff. So, no one demurrer can be considered on this point.

22 5. Plaintiff only talks about truth, and even his demonstrations are at a high level, his  
23 experiences, his discussions and conversations with normal people showed him that the latter  
24 perfectly understand what he is saying, because when it comes truth, anyone, meaning any honest  
25 person can easily understand what is right, what is wrong, what is good, what is bad. People and so,  
26 jury can understand, and so, no one demurrer can be considered on this point.

27 6. Defendants do not show and demonstrate the reality about their so-called consideration as  
28 « *unintelligible* ». Indeed, it seems that defendants do not know the real and precise definition of this  
29 word. So, no one demurrer can be considered on this point.

30 7. Plaintiff's complaint is written with 11941 words, so, around 1200 sentences with an average  
31 of 10 words by sentence. Defendants dare to claim that all words, all the 1200 sentences are  
32 unintelligible. This is pretty impossible. But the though-minded explanation shows that the problem  
33 of understanding comes only from the defendants themselves. So, no one demurrer can be considered  
34 on this point.

35  
36 • ***About the Claim considering the « 12<sup>th</sup> and 13<sup>th</sup> Causes of Action Fail to Allege Facts  
37 Sufficient to Constitute Causes of Action Upon Which Relief May Be Granted »,  
38 paragraph « B »:***

39 1. Defendants demonstrate their lack of intelligence, honesty and good faith to understand the  
40 only one fact about their presence in the complaint, because, as it is already explained in the  
41 complaint itself, and in the preamble of the present answer, it is not about the litigation with Scott  
42 STOCKER itself, but about the fact that authorities blocked the access to Plaintiff to file a criminal  
43 report and to obtain justice. The main problem comes that it is the only way to file a criminal  
44 complaint in California, as in any banana republic, in order to have a real investigation and a  
45 criminal file by the prosecutor, and so, to stop the criminal behaviours and acts of a criminal.  
46 Defendants committed an absolute, obvious and indisputable obstruction of justice, and are  
47 continuing to do it, still continuing to protect Scott STOCKER. None defendant justifies, and can  
48 justify such a strange and unlawful position and behaviour, nor their attorneys. In addition, regarding  
49 these federal offenses by the fact of corruption of persons having authorities, and in addition by the

1 fact of a collusion network, and in addition by the fact they are covering up the offenses of a  
2 criminal, and in addition of a criminal being part of a criminal organization, even the defendants'  
3 attorneys must be sued in a federal court for complicity.

4 So, no one demurrer can be considered on this point.

5 2. Still the same lack of explanation and justification about the use of a jurisprudence, legal  
6 precedents. This is too, a proof of lack of means for the demonstration. So, no one demurrer can be  
7 considered on this point.

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9 • ***About the Claim considering the « 12<sup>th</sup> and 13<sup>th</sup> Causes of Action are Unintelligible », paragraph « C »:***

10 1. Defendants claim not to be able to understand the simple fact they committed an obstruction of  
11 justice, and by their answer, their common answer, they are showing without any doubt that it was  
12 not a mistake but really a deliberate act, a criminal and federal one. So, no one demurrer can be  
13 considered on this point.

14 2. Defendants do not justify properly the persistence of their obstruction of justice, and so why they  
15 blocked and are blocking Plaintiff to file a criminal report against Scott STOCKER. So, no one  
16 demurrer can be considered on this point.

17 3. Regarding Federal offenses, none city or state Law can be used as reference.

18 4. Still the same lack of explanation and justification about the use of a jurisprudence, legal  
19 precedents. This is too, a proof of lack of means for the demonstration. So, no one demurrer can be  
20 considered on this point.

21 5. Defendants do not show any proof about their claim. So, no one demurrer can be considered on  
22 this point.

23 6. Bad faith, or lack of intelligence, or lack of knowledge about federal Law, or lack of honesty  
24 from defendants can not be a justification for a demurrer. So, no one demurrer can be considered on  
25 this point.

26 7. A quick remember :

27 The fact that the attorneys of the defendants consider the two causes of action (12 and 13)  
28 concerning their clients, as « *unintelligible* » is only based on their own limits of abilities for  
29 interpretation and understanding, within the limits of their education, their culture, their honesty,  
30 their moral sense, their intelligence.

31 In anyway but in case of mental health or mental deficiency, a defendant or his attorney can not  
32 claim such a demurrer.

33 If a defendant does not get the intellectual ability and/or the legal knowledge, or even not enough,  
34 he has the right to be helped and represented by an attorney. The fact for a defendant to choose a  
35 moron, or a stupid, or a dishonest, or simply an attorney limited by his own intellectual ability and/or  
36 legal knowledge, can not be a claim for a general denial, because the choice is under the only  
37 responsibility of the defendant.

38 If the defendant's representative, attorney or anyone else, admits his own intellectual limits, and/or  
39 legal knowledge ones, defendant has just to change of representative.

40 The fact that a defendant or plaintiff representative, an attorney/lawyer, expresses his own lack of  
41 intelligence and/or knowledge in legal can not be a claim for anyone demurrer. So, no one demurrer  
42 can be considered on this point.

43 8. The present point concerns the claim without proof by the attorney of defendants considering  
44 the pleadings concerning their clients, is « *unintelligible* », or « *ambiguous* », or  
45 « *incomprehensible* », or « *indecipherable* ».

46 • It has been previously demonstrated that this point can not be considered because it is only  
47 based on the claiming party's own limits of abilities for interpretation and understanding,  
48 within the limits of his education, his culture, his honesty, his intelligence, and so, can not  
49

1 prove that this allegation is true.

- 2 • It has been previously demonstrated that this point, even if it was true, is an advantage for the
- 3 defendant in a trial, and so it can not be claimed previously as a problem for his defense.
- 4 • **So, the present complement concerns an indisputable point in order to erase any doubt**
- 5 **about this question on the quality of the text of Plaintiff's complaint.**

6 **So, it is provided two testimonies (exhibit 1 and 2), two notarized affidavits by two**

7 **independants persons,**

8 1. Affidavit from Michael PALMIERI, notarized the 02<sup>nd</sup> of december, 2015

9 2. Affidavit from Bree J. SCHUETTE, notarized the 28<sup>th</sup> of november, 2014.

10 **Both declare that Plaintiff's complaint is fully readable and understandable. In addition, it is**

11 **even demonstrated, despite the allegations of the adverse party, that it « follows a path of**

12 **logic ».**

13 **So, it is demonstrated that the allegations of the defendant's attorney are indeed, lies, a**

14 **perjury, or at least, that they can not be accepted because wrong.**

15

16 • *About the Claim considering the « Complaint Is Fatally Defective Because He Fails To*

17 *Allege He Timely Presented a Claim to the City », paragraph « D »:*

18 1. Regarding corruption by persons representing and having authority, involved and forming a

19 collusion network, and in addition by the fact they are covering up the offenses of a criminal, and in

20 addition of a criminal being part of a criminal organization, Federal Law applies. So, no one

21 demurrer can be considered on this point.

22 2. None government or state or city rules can be against the fundamental Law of United States,

23 and especially about Civil Rights, according Declaration of Independance and Constitution. So, no

24 one demurrer can be considered on this point without to be a violation of Civil Rights.

25 3. Following his discovery about the corruption of the police officer Nathan VASQUEZ, Plaintiff

26 tried to file this kind of complaint about his misconduct to the City, (written proof), but he discovered

27 that it was for nothing, feeling the same kind of corruption, and he understood that this process was

28 against his own interest, but only for the ones of the City, to get a defense but not to protect victims.

29 A process needing 45 days to answer, which was yet, an increase of Plaintiff's damages, but also, a

30 privilege given by those authorities to criminals, for their own defense and protection. This

31 government code is a shame, a point against Civil Rights and is unconstitutional. So, no one

32 demurrer can be considered on this point without to be a violation of Civil Rights.

33 4. Defendants expresses that this Government Code « *Subject to exceptions not applicable here* »

34 but do not explain what are these exceptions, and so why they are not applicable, and so, claiming

35 something on the name of an article of Law which contains exceptions, without to prove these

36 exceptions are not acceptables and can not be applied, is like not to prove absolutely that the

37 aforementioned article of Law applies properly for the case.

38

### 39 **CONCLUSION.**

40 No one Defendant, nor their attorneys talked about the real problem concerning their presence in

41 this case, the fact they blocked Plaintiff to file a criminal report.

42 Worse, Defendants and their attorneys are continuing to protect a criminal from prosecution, and

43 are doing more criminal offenses, even federal ones concerning, now without any doubt, a corruption

44 network of persons having authority for the benfit of a criminal being part of a criminal organization.

45 Their common acts against Plaintiff are about Civil Rights, a violation of his Civil Rights, and so,

46 their offenses are under federal Law.

47 Defendants and their attorneys do not answer properly about the purpose of their presence in the

48 complaint.

49 Defendants and their attorneys do not act as honest and good faith persons having done a mistake.



1 The collusion between each Defendant in order to commit an obstruction of justice, is real and  
2 indisputable.

3 The collusion between each Defendant in order to cover up the criminal offenses committed by  
4 Scott STOCKER, is real and indisputable.

5 The collusion between this part of Defendants with the part of Defendants on the side of Scott  
6 STOCKER, is real and indisputable by having exactly the same poor strategy of defense by using  
7 the same fake, false, wrong, stupid and absurd arguments, and too, filed within 7 days.

8 This way to claim demurrers by using a single fake, false and wrong argument without any  
9 demonstration, any example, is not acceptable.

10 Their only way of defense is about a single so-called technical issue which shows without any  
11 doubt that defendants have no one argument about the case itself, and about their justification of their  
12 unlawful behaviour. Just for this, their presence in the case is definitively justified.

13 A jury can understand what those defendants are trying to do, like a jury can understand what  
14 Plaintiff claims and wrote, and this is the main priority and purpose of the complaint, and the answer  
15 made by a jury will be the final proof that the complaint is not unintelligible nor incomprehensible.

16 And, if it was the case that the complaint is a total nonsense, defendants have nothing to fear of a  
17 trial, and its jury. And so, Defendants and/or defendant's representatives would have not to claim this  
18 point for nullity, because in this case if it was true, it is in their only favor, and so, they could win in a  
19 court, and in front of a jury...

20 Indeed, their ridiculous behaviour, this way to claim this point which is a total nonsense as  
21 aforesaid, is rather an absolute proof that all of them have fully understood what Plaintiff declares  
22 and claims, and so, explains why they can only claim this absurd point about an unfair local law.

23 The question is : What have all those defendants and their attorneys, to lose if they respected their  
24 duty ? Or to win...

25 And the final question is : Has Plaintiff to file complaint at Federal Court in San Jose to recover  
26 his civil rights, and money for only payment of all damages he is suffering ?

27 Claiming not to understand does not prove that the text is unintelligible, or incomprehensible. It  
28 proves only the own intellectual limits of the person who claims this, in knowledge and/or  
29 intelligence.

30 Morons always try to make believe to people they are smart by explaining simple things by an as  
31 complicated as possible manner, when smart people try to say, to explain complicated things under  
32 the easier way. Attorneys always use complicated ways to try to justify the money they take from  
33 their clients. Plaintiff is not an attorney, he is honest, and smart.

34 When it comes Truth, only bad people need an explanation, a demonstration, which is obviously  
35 useless « thanks » to their bad faith and dishonesty.

36 When it comes Truth, good people do not need an explanation, a demonstration because they are  
37 able by themselves to know, to understand what is wrong, just by the facts, because their moral  
38 values are anchored in their soul and heart. Plaintiff's complaint demonstrations are for those bad  
39 people because Law requires to do it. If they are not able to understand, or rather, if they claim to do  
40 not, it is their own problem.

41 Semantics knowledge gives the ability to understand the subtle difference between « to be » and  
42 « to be considered as » which is commonly used by a simpler way under the only word « as ».

43 All defendants are completely devoid of moral sense and of moral values. It is the only reason  
44 why they are not able to understand, and why they don't understand. Not because the text is  
45 « unintelligible ».

46 And sure, they will not be able to understand the present answer.

47 In conclusion, their common single claim is a fanciful and ridiculous defense, which shows the  
48 quite opposite of what they are trying to show and to do, and above all, the fact they have fully  
49 understood the risk of a jury trial by trying to avoid it... It is the common and only way of bad

1 people.

2 **PRAYER FOR RELIEF.**

3 Plaintiff, in order to respect his Civil Rights and his request for a jury trial for which he has yet paid  
4 the advance fees, requests from the Court to order and declare :

- 5 1. To dismiss the motion of demurrer of the adverse party because it is null and void by the fact  
6 it contains numerous lacks of legality ;  
7 2. To dismiss the motion of demurrer of the adverse party because it is null and void by the fact  
8 it contains and it is based on deliberate fake and wrong allegations, distortion of the truth, lies  
9 and perjuries ;  
10 3. To dismiss the motion of demurrer of the adverse party because it is unclear, uncertain, and it  
11 does not state any points by its lack of proof ;  
12 4. To dismiss the motion of demurrer of the adverse party because it is a deliberate obstruction  
13 of justice causing damages on Plaintiff ;  
14 5. To dismiss the motion of demurrer of the adverse party because it is a deliberate abuse of  
15 process causing damages on Plaintiff ;  
16 6. To dismiss the motion of demurrer of the adverse party because it is a violation of Plaintiff's  
17 Civil Rights to get a fair trial, to get payment for his damages ;  
18 7. That Defendants have to pay to Plaintiff the sum of \$100,000 for pain and suffering ;  
19 That Defendants have to pay to Plaintiff the sum of \$15,000 for all costs of suit incurred  
20 herein; and for such other and further relief as deemed just and proper.  
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23 The 12<sup>th</sup> of January 2015,  
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26  
27 Laurent GRANIER,  
28 Plaintiff, self-represented