

FILED
ENDORSED

2013 SEP 30 PH 3:00

LEGAL PROCESS #2

1 MICHAEL A. FARBSTAIN (SB#107030)
2 MAGGIE W. TRINH (SB# 279604)
3 FARBSTAIN & BLACKMAN
4 A Professional Corporation
5 411 Borel Avenue, Suite 425
6 San Mateo, California 94402-3518
7 Telephone: (650) 554-6200
8 Facsimile: (650) 554-6240

9 Attorneys for Cross-Defendants
10 MARTHA STEFENONI and SHIRLEY BAKER

11
12 SUPERIOR COURT OF THE STATE OF CALIFORNIA
13
14 COUNTY OF SACRAMENTO
15

16 THE NATIONAL GRANGE OF THE
17 ORDER OF PATRONS OF
18 HUSBANDRY, a Washington, D.C.,
19 nonprofit corporation,

20 Plaintiff,

21 vs.

22 THE CALIFORNIA STATE GRANGE,
23 a California nonprofit corporation, and
24 ROBERT McFARLAND, JOHN
25 LUVAAS, GERALD CHERNOFF and
26 DAMIAN PARR,

27 Defendants.

28 and related Cross-Actions.

CASE NO. 34-2012-00130439

CROSS-DEFENDANTS MARTHA
STEFENONI AND SHIRLEY BAKER'S
NOTICE OF SPECIAL MOTION TO
STRIKE
[ANTI-SLAPP, CCP §425.16]

RESERVATION NO.: 1877422

DATE: October 29, 2013

TIME: 2:00 p.m.

DEPT.: 53

JUDGE: Hon. David Brown

Complaint Filed: October 1, 2012

Trial Date: Not yet

BY FAX

TO ROBERT McFARLAND AND HIS ATTORNEYS OF RECORD:

NOTICE IS HEREBY GIVEN that on October 29, 2013, at 2:00 p.m. in

Department 53 of the Sacramento County Superior Court, Gordon D. Schaber Sacramento
County Courthouse, located at 800 Ninth Street, Third Floor, Sacramento, California,
Cross-Defendants MARTHA STEFENONI AND SHIRLEY BAKER will move, and
hereby do specially move to strike the cross-complaint of ROBERT McFARLAND,

1 including all causes of action therein, and for an award of attorneys fees and costs.

2 This motion is made on the grounds that the cross-complaint arises solely for cross-
3 defendants' activities in furtherance of their protected rights to free speech and petition
4 activities. Accordingly, the Court should strike Robert McFarland's cross-complaint as a
5 SLAPP pursuant to Code of Civil Procedure §425.16.

6 This motion is based on this notice, the accompanying memorandum of points and
7 authorities, the declarations of Martha Stefenoni and Shirley Baker, the declaration of
8 Edward L. Luttrell (filed in another motion, and included herein by request for judicial
9 notice), the appendix of exhibits, and such other oral and documentary evidence which may
10 be presented at the time of the hearing.

11 Wherefore, cross-defendants respectfully request this Court issue an order granting
12 this motion dismissing the action in its entirety, and for an award cross-defendants attorney
13 fees and costs, pursuant to Code of Civil Procedure §425.16.

14
15
16 DATED: September 30, 2013

FARBSTEIN & BLACKMAN
A Professional Corporation

17
18
19 By



Michael A. Farbstein
Maggie W. Trinh
Attorneys for Cross-Defendants
MARTHA STEFENONI and SHIRLEY
BAKER