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GLORIA ALLRED, STATE BAR # 65033
MICHAEL MAROKO, STATE BAR # 62013
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JOHN STEVEN WEST, STATE BAR # 102034
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Attorneys for Plaintiff Irene McCormack Jackson

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF SAN DIEGO

IRENE McCORMACK JACKSON,
Plaintiff,
vs.
CITY OF SAN DIEGO; ROBERT ("BOB")
FILNER, an Individual; and DOES 1
through 25, inclusive,
Defendants.

CASE NO: 37-2013-000586 B-CU-OE-CTL
Judge Richard E.L. Strauss - Dept C-75
STATEMENT OF DAMAGES

BY FAX

Plaintiff Irene McCormack Jackson hereby responds to the Request for Statement of Damages propounded by defendant City of San Diego pursuant to Code of Civil Procedure § 425.11 in the above-entitled matter as follows:

Plaintiff believes that her general damages for emotional distress, pain and suffering amount to \$950,000. That estimation is based upon an incomplete assessment of the emotional consequences of the events alleged in the complaint.

Plaintiff is informed that the cost of treatment for her emotional injuries is approximately \$70,000. Plaintiff does not know the cost of treatment to date, but believes that the costs are several thousand dollars.

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1 Plaintiff has suffered loss of earnings to date of approximately \$11,000.00. Plaintiff
2 believes that she will suffer future loss of earnings estimated to be approximately \$450,000. The
3 plaintiff has not had her future loss of income assessed, and the exact extent of those damages
4 cannot presently be determined.

5 Dated: October 17, 2013

ALLRED, MAROKO & GOLDBERG
GLORIA ALLRED
NATHAN GOLDBERG
MICHAEL MAROKO
JOHN S. WEST

8
9 By: 

MICHAEL MAROKO
Attorneys for Plaintiff
Irene McCormack Jackson

OCT 17 2013 11:11 AM

Clerk of the Superior Court

OCT 17 2013

PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

By: **A. SEAMONS, Deputy**

I am employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action; my business address is: 6300 Wilshire Boulevard, Suite 1500, Los Angeles, California 90048.

On October 17, 2013, I served the foregoing document described as STATEMENT OF DAMAGES on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Jan Goldsmith, City Attorney
Joe Cordileone, Chief Deputy City Attorney
OFFICE OF THE CITY ATTORNEY
1200 Third Avenue, Suite 1620
San Diego, CA 92101
Fax Number: 619/533-5856
Phone: 619/533-5800

James L. Payne, Esq.
Alejandro Ruiz, Esq.
PAYNE & FEARS
4 Park Plaza, Suite 1100
Irvine, California 92614
Fax Number: 949/851-1212
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Attorneys for City of San Diego

Attorneys for Robert ("Bob") Filner

Harvey Berger, Esq.
POPE, BERGER & WILLIAMS
3555 Fifth Avenue, Suite 300
San Diego, CA 92103
Fax Number: 619/236-9677
Phone: 619/595-1366

Attorneys for Robert ("Bob") Filner

BY MAIL: I caused such envelope with postage thereon fully prepaid to be placed in the United States mail at Los Angeles, California.

BY FAX: by transmitting a true copy via facsimile transmission from telecopier number (323) 653-1660 located at 6300 Wilshire Blvd., Ste. 1500, Los Angeles, California 90048.

BY FEDERAL EXPRESS: I caused such document(s) to be delivered via Federal Express in a package designated to be picked up by Federal Express with delivery fees provided for to the addressee(s) designated. I am readily familiar with the business practice of collecting and processing correspondence to be picked up by an employee of Federal Express.

Executed on October 17, 2013, at Los Angeles, California.

(State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

(Federal) I declare that I am employed in the office of a member of the bar of this Court at whose direction the service is made.

JENNIFER SHUEMAKER