

June McHuen

From: Clerk of the Board
Sent: Tuesday, August 1, 2023 8:01 AM
To: John Gioia; Supervisor Candace Andersen; Supervisor_Burgis; Supervisor Carlson; District5
Cc: Monica Nino; Julie Enea; Joyce Ring-Reaves; June McHuen
Subject: FW: FOR MEETING OF COUNTY BOARD OF SUPERVISORS AUGUST 1, 2023 at 9 am - Fwd: 3131 Withers - Additional evidence of ongoing violations of business use permit and fence height; Renewed request for enforcement.

Attachments: Declaration_-_Ariel_Feigenbaum_with_exhibits_SIGNED 2023-06-30.pdf; Photo of Josh maintaining tarp-2023-06-29-16-30-30.jpg.pdf; Excerpts Deposition Heather Juracich 2023-05-09 for email.pdf; Screenshot of Yelp reviews 2023-05-23 at 3.37.46 PM.png.pdf; Photo of Tarp Fence 2022-08-24_180252.jpg.pdf; Planning Department history showing complaints and results including notice to comply as of 2023-05-11 DC000001-DC001009.pdf

Stacey M. Boyd
Deputy Clerk
Clerk of the Board
1025 Escobar St., 1st Floor
Martinez, CA 94553
(925)655-2002 (Desk)
(925)655-2000 (Office)

From: Shona Armstrong <shona.armstrong@harperarmstrong.com>
Sent: Tuesday, August 1, 2023 1:38 AM
To: Clerk of the Board <ClerkOfTheBoard@cob.cccounty.us>
Subject: FOR MEETING OF COUNTY BOARD OF SUPERVISORS AUGUST 1, 2023 at 9 am - Fwd: 3131 Withers - Additional evidence of ongoing violations of business use permit and fence height; Renewed request for enforcement.

Please see the attached documentation of ongoing violations of the law and violations of an existing use permit for 3131 Withers.

The violations have existed for decades (operating a dog kennel/boarding facility in a residential zone in violation of use permit [LP07-2019) and years (erecting a tarp fence/blight without permits), and the County has taken no action despite years of neighbors notifying, protesting, begging, and many finally moving/selling to escape.

1. Letter to County Department of Conservation and Development (Aruna Bhat) September 25, 2020, including as Exhibit A records from the 2013 compliance review of permit issued in late 2007 [LP07-2019], showing the permission is explicitly CONDITIONED on compliance with conditions that the property owners are violating
2. Affidavit of Ariel Feigenbaum regarding recent (September 2021 through February 2022) use of dog kennel at 3131 Withers.
3. Screenshot of recent (May 23, 2023) YELP review of dog boarding services at 3131 Withers

4. Photo of Josh Gum maintaining his tarp fence on June 29, 2023
5. Excerpt from Deposition of Heather Juracich saying she doesn't bother to read or obey notices from the County
6. Photo of tarp fence viewed from neighboring yard
7. Planning Department enforcement record showing complaint from 2006 and Notice to comply re tarp fence issued 2022-12-01

----- Forwarded message -----

From: **Shona Armstrong** <shona.armstrong@harperarmstrong.com>

Date: Fri, Jul 7, 2023 at 1:47 PM

Subject: Fwd: 3131 Withers - Additional evidence of ongoing violations of business use permit and fence height; Renewed request for enforcement.

To: <john.kopchick@dcd.cccounty.us>, <ruben.hernandez@dcd.cccounty.us>, Joseph Losado <joseph.losado@dcd.cccounty.us>, Larry Tolson <larry.tolson@dcd.cccounty.us>, Jason Crapo <jason.crapo@dcd.cccounty.us>, AJ Alexander <prtn755@gmail.com>, Ray Bartlett <rbartlett510@gmail.com>, Alexy Goldstein <alexgoldstein@gmail.com>, Kate G <bellakate1984@gmail.com>, Andrew Brimmer <andrew.brimmer@harperarmstrong.com>

Please agendaize a public hearing on revocation of the use permit that has been violated for years at 3131 Withers, and which the owners of 3131 Withers continue to violate.

According to the very terms of the use permit, it is subject to revocation upon violation, and we have presented pages of hard evidence and testimony about ongoing violations.

As we have noted, the County's failure to act to enforce its laws for over a decade has led to death threats, restraining orders, and ongoing rising tensions. Many neighbors are trying to sell their property to escape the abuse and violations, but their neighbors' violations make selling very difficult.

All the neighbors pay property tax and expect the County to protect their interests and their property values.

We look forward to a prompt response and a hearing as soon as is practicable.

----- Forwarded message -----

From: **Shona Armstrong** <shona.armstrong@harperarmstrong.com>

Date: Tue, Jul 4, 2023 at 5:51 PM

Subject: Fwd: 3131 Withers - Additional evidence of ongoing violations of business use permit and fence height; Renewed request for enforcement.

To: Ray Bartlett <rbartlett510@gmail.com>, AJ Alexander <prtn755@gmail.com>, Alexy Goldstein <alexgoldstein@gmail.com>, Kate G <bellakate1984@gmail.com>

Cc: Andrew Brimmer <andrew.brimmer@harperarmstrong.com>, Mariko Kamiya <mariko.kamiya@harperarmstrong.com>

----- Forwarded message -----

From: **Shona Armstrong** <shona.armstrong@harperarmstrong.com>

Date: Sat, Jul 1, 2023 at 2:38 AM

Subject: 3131 Withers - Additional evidence of ongoing violations of business use permit and fence height; Renewed

request for enforcement.

To: <joseph.losado@dcd.cccounty.us>, <larry.tolson@dcd.cccounty.us>, Kurtis C Keller <Kurtis.Keller@cc.cccounty.us>, Jason Crapo <jason.crapo@dcd.cccounty.us>, Clerk <clerk@santaclaraca.gov>
Cc: Andrew Brimmer <andrew.brimmer@harperarmstrong.com>

1. I am attaching another sworn **affidavit** by a recent client (Ariel Feigenbaum) who used the dog day care that has been operating illegally for years at Gumranch/3131 Withers. I am also attaching recent YELP reviews of ongoing dog boarding at 3131 Withers. My clients continue to see and hear dogs coming and going at 3131 Withers, because the business continues to operate there illegally.

2. Thank you for the additional **document production**. I still see **no evidence that the County is taking any enforcement action** beyond the notices of violation the County issued in December 2022 and again in March 2023. What is the reason for this failure to act? As we have explained and demonstrated in letter after letter, email after email, and call after call, there are ongoing violations of the County code at 3131 Withers. The County apparently declined in 2020 to consider our many pages of evidence of these violations and apparently closed the complaint DESPITE the many pages of evidence we submitted. The County will certainly not find any evidence of ongoing violations if it never seeks or acknowledges such evidence. Is it the case that any law breaker can avoid consequences simply denying their lawbreaking despite substantial evidence of such law breaking? The County's reluctance to take the trouble to enforce the law has resulted in death threats against my clients and a civil harassment restraining order against Josh Gum.

3. **Please revoke the use permit that allows operation of any business at 3131 Withers and please apply applicable penalties for both the ongoing tarp fence violations and the decades of use permit violations.** We are fairly certain Josh Gum and Heather Juracich will not respond to mere revocation of the permit by ceasing their operations. Why would they? The County so far has never taken any substantive action to enforce its rules despite literally decades of neighbors suffering, complaining, and ultimately being driven out of the neighborhood by the Gum-Juracich family. For years now, the County has left my clients to try to enforce the rules through expensive civil lawsuits.

Nevertheless, the use permit provides that it will be revoked in the case of violations, and we have now provided two witnesses who have testified (one at deposition and one in written declaration) that they have used the onsite services of the doggy day care at 3131 Withers. Revoking the permit, or at least holding a hearing on this issue, is the very least the County can and should do.

4. The **tarps remain up**. I am attaching here photos from yesterday at 4:30 pm and excerpts from a recent deposition of Heather Juracich at which she acknowledges that she and Josh Gum have willfully ignored the County's instructions to remove the tarps.

We look forward to seeing some evidence that fines or any other consequences are being imposed that might result in real-world behavior changes.

Attached:

1- Declaration of Ariel Feigenbaum - June 30, 2023

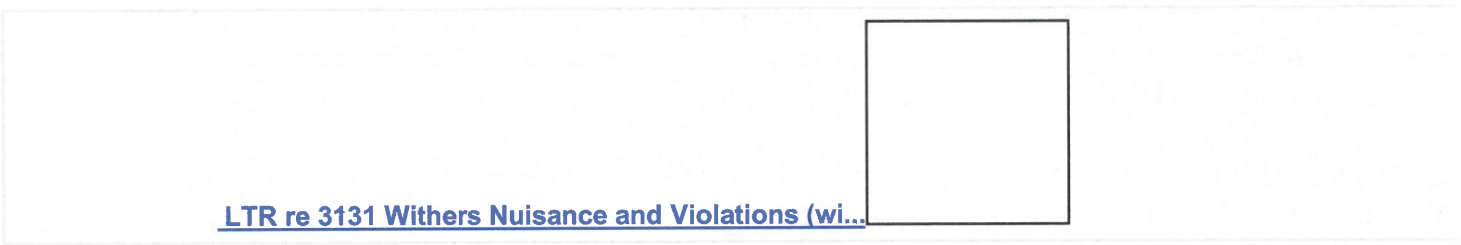
2- Photo of Josh Gum maintaining his tarp fence on June 29, 2023

3- Excerpt from Deposition of Heather Juracich saying she doesn't bother to read or obey notices from the County

4- recent Yelp reviews of dog day care at 3131 Withers

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Shona Armstrong, Esq.
Harper & Armstrong, LLP
1634 Telegraph Ave., #3
Oakland, CA 94612
(w) (510) 420-8455
(c) (510) 508-5017



LTR re 3131 Withers Nuisance and Violations (wi...

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF CONTRA COSTA

.....

**CERTIFIED
TRANSCRIPT**

JOSH GUM, ET AL.,

Plaintiff,

vs.

Case No.: C22-00927

RAYMOND LANE BARTLETT, ET AL.:

Defendants.

DEPOSITION OF HEATHER JURACICH

Tuesday, May 9, 2023

Stenographically Reported by:
MARY ANN SCANLAN, CSR NO. 8875 RDR-CRR-CCRR-CLR



Certified Shorthand Reporters

408 Columbus Avenue, Suite 2, San Francisco CA 94133

o / 415.834.1114 f / 415.399.9266

e / info@scanlanstone.com w / scanlanstone.com

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APPEARANCES

ATTORNEY FOR PLAINTIFFS JOSHUA GUM AND HEATHER JURACICH:

LAW OFFICES OF MARK R. MITTELMAN, PC

3478 Buskirk Avenue, Suite 262

Pleasant Hill, California 94523

925-256-0677

By: MARK R. MITTELMAN, attorney at Law

mmittelman@mittellaw.com

ATTORNEYS FOR DEFENDANTS RAYMOND BARTLETT and ANASTASIA
ALEXANDER:

HARPER & ARMSTRONG, LLP

1634 Telegraph Avenue, Suite #3

Oakland, California 94612

510-420-8455

By: ANDREW BRIMMER, Attorney at Law

Andrew.brimmer@harperarmstrong.com

SHONA ARMSTRONG, Attorney at Law

shona.armstrong@harperarmstrong.com

Also present: Josh Gum

.....

GUM vs BARTLETT

1 they're not, so --

2 BY MR. BRIMMER:

3 Q. When did you have that conversation where they
4 told you that the privacy screens were fine?

5 A. Speak with my husband. I do not recall the
6 dates.

7 Q. But you do recall being told more recently
8 that the county doesn't think that the privacy screens
9 are okay, correct?

10 A. And we --

11 Q. That is a yes-or-no question.

12 A. I believe so, yes.

13 Q. Okay. And when did you receive that
14 information?

15 A. I don't remember.

16 Q. Was it this year?

17 A. Yes.

18 Q. Was it this month? Was it in May of 2023?

19 A. No.

20 Q. Was it in April of 2023?

21 A. I don't remember. It was sometime in 2023,
22 March or April.

23 Q. March or April of 2023.

24 Do you remember what that notice said?

25 A. No.

GUM vs BARTLETT

1 Q. Did you read that notice?

2 A. No. I basically look at that stuff now and
3 just put it in a pile.

4 Q. Put it in a pile of what?

5 A. Of things to hand to my attorney.

6 Q. Oh, okay. So you didn't read it?

7 A. (Shakes head.)

8 Q. And after you received communication from the
9 county indicating that the privacy shades were not okay,
10 did you take any steps to give the county what they
11 want?

12 MR. MITTELMAN: Vague and ambiguous.

13 BY MR. BRIMMER:

14 Q. The tarps are still up, right?

15 A. Yeah.

16 Q. Why haven't you taken them down?

17 A. I don't know.

18 Q. Ever hear anyone complaining about people
19 rollerskating or skateboarding in your yard?

20 A. No.

21 Q. Can that be noisy sometimes?

22 A. Yes.

23 Q. The dog training that happens on your
24 property, has anyone ever complained about that?

25 A. No.

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SHONA ARMSTRONG. (BAR NO. 191685)
ANDREW BRIMMER (BAR NO. 179146)
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1634 Telegraph Avenue, Suite #3
Oakland, CA 94612
Telephone: (510) 420-8455
Facsimile: (510) 858-5953
Shona.armstrong@harperarmstrong.com
Attorneys for Plaintiff
ALEXY GOLDSTEIN

SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF CONTRA COSTA, UNLIMITED JURISDICTION

ALEXY GOLDSTEIN, an individual,)	Case No. MSC22-00502
)	
Petitioner.)	
)	DECLARATION OF ARIEL
vs.)	FEIGENBAUM
JOSHUA GUM, an individual, AND)	
HEATHER JURACICH, an individual; AND)	
DOES, ONE through TEN, inclusive,)	
)	
Defendants.)	Assigned to Dept. 18 for All Purposes
_____.)	Hearing Date:
)	Time:
JOSHUA GUM and HEATHER JURACICH,)	Judge: Hon. Danielle K. Douglas
Cross-Complainants,)	
)	
vs.)	Complaint Filed: March 17, 2022
)	Cross Complaint Filed: May 19, 2022
ALEXY GOLDSTEIN; and ROES 1-50)	Trial Date: Not set
)	
Cross-Defendants.)	
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I, ARIEL FEIGENBAUM, hereby declare I have personal knowledge of the matters contained in this declaration and, if called as a witness to testify, I could and would competently testify thereto.

1. I live at 3436 Moraga Blvd., Lafayette, California.

2. My husband, Dan Chamberlain, and I have a Portuguese Water Dog named Toby.

3. My mother-in-law, Joan Chamberlain, has volunteered at the Lindsay Wildlife Preserve, which is where she learned that Heather Juracich operates a doggy day care pet sitting business on her property at 3131 Withers.

4. My husband, Dan Chamberlain, and I were interested in finding a fun and safe place for Toby to spend time so we could work and travel for work.

5. We learned of the Gum Ranch/Heather’s Pet Care dog sitting business from my mother-in-law Joan Chamberlain.

6. In approximately September 29, 2021, my husband and I arranged to make our first visit to the property at 3131 Withers.

7. We scheduled an initial “meet and greet” pursuant to the procedures of the dog sitting business.

8. The service request we received from gumranch@gmail.com for this visit stated the regular price for the meet and greet visit is \$40, but we had to pay \$50, because our dog was too young to be neutered. A true and correct copy of the emails leading up to the meet and greet visit are attached hereto as **Exhibit A**.

9. Josh Gum and Heather Juracich met me and Toby at the property at 3131 Withers on September 29, 2021.

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10. The initial visit was an opportunity for us to see the environment where Toby would be staying during the day if we chose to become clients and an opportunity for Josh Gum and Heather Juracich to meet and assess our Toby.

11. We planned to leave Toby for daytime dog sitting, and it was my understanding that Josh Gum and Heather Juracich, if we needed it, would also provide overnight dog care.

12. On September 29, 2021, Josh Gum and Heather Juracich showed me around the property at 3131 Withers.

13. I am not entirely certain anymore whether it was both Josh Gum and Heather Juracich or just Josh Gum who gave me the entire tour. I do remember, however, that he (or they) showed me the large backyard/“farm” area of their yard where the animals ran around and had places to jump and climb.

14. He or they also took me inside a garage around the back of their house and showed me this inside area.

15. Inside the garage-type outbuilding, there were couches and several crates.

16. There was also a treadmill at the property.

17. We were interested in crate training Toby, so we liked the idea that he could spend some quiet time in a crate for part of the day.

18. I saw a minimum of five crates in the garage building.

19. While I was at 3131 Withers, Josh’s Belgian Malinois was on the property, and I believe there were a few other littler dogs running around.

20. We were able to check out how much space Toby would have to run around.

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21. Josh and Heather were able to check out Toby’s ability to get along with other dogs and obey commands.

22. Following our “meet and greet” site visit on September 29, 2021, Josh and Heather accepted us and Toby as clients, and I signed Toby up to attend doggy day care at 3131 Withers.

23. I created an account on Josh and Heathers’s pet care portal at petsoftware.net. A true and correct copy of the email Josh and Heather sent to me on September 23, 2021, inviting me to sign into their client portal and of a January 5, 2021, follow-up email regarding our account are attached hereto as a part of **Exhibit B**.

24. The portal required me to provide information about Toby’s vaccination status and provide contact information for me and my husband and for Toby’s veterinarian.

25. On many days throughout approximately November and December 2021 and again in February 2022, Toby stayed at 3131 Withers during daytime work hours approximately 8:00 am – 6:00 pm. True and correct copies of invoices we received and paid along with records of payment are attached hereto as **Exhibit C**.

26. We paid Josh and Heather \$40/day for care.

27. When we dropped Toby off each day, Josh and/or Heather would meet Toby at the car in the driveway at 3131 Withers and take him into their yard.

28. When we picked Toby up, Josh and/or Heather would bring Toby to the car in the driveway at 3131 Withers.

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29. It was clear that Toby was spending his day with other dogs at the property at 3131 Withers. For example, a true and correct copy of the email exchange I had with Josh Gum on February 10, 2022, is attached hereto as **Exhibit D**. In it, he states:

“He [Toby] was with me all day except when I crated them all for about 30 min. when I went to pick up the kids at school. He ran A LOT, we had a full house and there were a lot of dogs to play with, and he met new dogs.”

30. Eventually Toby began to react badly to visiting Gumranch.

31. In approximately early February 2022, Toby began to seem distressed by the time he spent at Gumranch at 3131 Withers.

32. Because of Toby’s bad reaction to arriving at Gumranch, we stopped using the Gumranch dog day care service on approximately February 10, 2022.

33. I was angry that Josh Gum had put Toby on the treadmill or training without first discussing the plan with me and because he had taken Toby off the property in January 2022 without first obtaining my consent. (See Exhibit B.)

I declare under penalty of perjury under the laws of the State of California that the above statements are true and correct and that this Declaration was executed this 30th day of June, 2023, in Lafayette, Contra County, California.

DATED: June 30, 2023

DocuSigned by:
Ariel Feigenbaum
BB255FE9930642E...
Ariel Feigenbaum

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- Exhibit A: Emails leading up to the meet and greet visit in September 2021, and September 23, 2021, invoice for meet and greet visit
- Exhibit B: Invitation to join client portal and follow-up email regarding portal data
- Exhibit C: Invoices we received and paid for Toby's care during November 2021-February 2022 and Venmo records of payment
- Exhibit D: Email exchange I had with Josh Gum in February 10, 2022, regarding Toby's experience at Gumranch

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Exhibit A



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Services requested for Toby account number 1444001719

1 message

Heather & Josh's Pet Care <mailer@petssoftware.net>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com

Thu, Sep 23, 2021 at 10:53 AM

The following services have been requested for client Ariel Feigenbaum account number 1444001719

Date	Day	Time	Service	Notes
09/29/2021	Wed	7:00am-7:30am	4. \$40 Meet'n Greet Screening Daycare (Tue,Wed,Thur 7-9am)	Just spoke with Josh. Would like to bring Toby in for a meet and greet day. He is not yet neutered so I understand that the price is \$50. My partner, Dan, will be bringing Toby to the screening and picking him up.

**** PLEASE NOTE: All clients are REQUIRED to fill out the Veterinary Treatment Authorization form which you can find in the Client Portal under Your Data. If you have not yet filled out the form, please return to the portal and take care of this now by clicking here: <http://0206heatherandjoshspetcare.petssoftware.net/clientportal?account=1444001719> ****

Thank you for using Heather & Josh's Pet Care. We are delighted to have received your request for service.

Please note that while we will make every effort to fulfill every service request, your request is not yet confirmed. Please look out for another email which will confirm that we are able to provide your services.

The Admin Team

Heather & Josh's Pet Care
Tel: 510-219-3786
gumranch@gmail.com



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Confirmation of scheduled services for Toby account number 1444001719

2 messages

Heather & Josh's Pet Care <mailer@petssoftware.net>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com

Thu, Sep 23, 2021 at 10:55 AM

The following services have now been scheduled (account Ariel Feigenbaum 1444001719):

Date	Day	Time	Service
09/29/2021	Wed	7:00am-7:30am	4. \$40 Meet'n Greet Screening Daycare (Tue,Wed,Thur 7-9am)

Thank you for using Heather & Josh's Pet Care. We are delighted to let you know that the services you requested are now scheduled and confirmed.

The Admin Team

Heather & Josh's Pet Care
Tel: 510-219-3786
gumranch@gmail.com

Ariel Feigenbaum <asfeigenbaum@gmail.com>
To: gumranch@gmail.com, Dan <Golkpr@gmail.com>

Thu, Sep 23, 2021 at 11:02 AM

Thank you- what is your address? Dan will be bringing him by around 8:15am for the tour/visit and picking him up before 6:30pm.

Thank you,
Ariel
[Quoted text hidden]



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Business Hours

1 message

Heather & Josh's Pet Care <gumranch@gmail.com>

Thu, Sep 23, 2021 at 12:10 PM

Reply-To: gumranch@gmail.com

To: asfeigenbaum@gmail.com, golkpr@gmail.com

Business Hours:

Drop off and pick up hours are as follows:

***Monday through Friday**

7 AM to 10 AM, or 4 PM to 7 PM

We are closed from 10:01am-3:59pm

***Saturday-8 AM to 11 AM only**

***Sunday-Closed for drop off and pick up.**

Please contact us if you have any questions.

Sincerely,

Heather & Josh's Pet Care



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Directions

1 message

Heather & Josh's Pet Care <gumranch@gmail.com>

Thu, Sep 23, 2021 at 12:11 PM

Reply-To: gumranch@gmail.com

To: asfeigenbaum@gmail.com, golkpr@gmail.com

Our address is:

3131 Withers Ave, Lafayette CA 94549

Please ring the blue button near the key pad and we will let you in. Drive all the way up the driveway to your right and we will come out to greet you. Please have your dog on a leash.

What to bring:

If you want to bring your own food, please put it in a Ziploc bag, or a plastic tub labeled with your dog's name and the amount per feeding. (ex. Charlie 1 cup 2x per day). You can also opt to have your dog eat our house food which is "Diamond Naturals Beef & Rice".

You may bring a blanket or bed if you like but, it must be something that is machine washable, and labeled with your dog's name. Please do not bring measuring cups, bowls, leashes, or any beloved toys...Bring items at your own risk. If you're bringing meds or supplements use bring a pillbox.

Please email with any questions.



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Invoice for Toby No. 2053

1 message

Heather & Josh's Pet Care <mailer@petsoftware.net>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com, golkpr@gmail.com
Cc: gumranch@gmail.com

Wed, Sep 29, 2021 at 2:49 PM

Hi Ariel,

RE: LATEST ACCOUNT NOW DUE FOR PAYMENT

Please find attached your latest account summary and invoice information which you can access by clicking this link
<http://0206heatherandjoshspetcare.petsoftware.net/clientportal?account=1444001719>

If you have any questions about your account please simply reply to this email.

We value your business and welcome your comments about our service.

With best regards,

Heather & Josh

Heather & Josh's Pet Care
Email: gumranch@gmail.com
Phone: 510-219-3786

2 attachments

 **LatestAccountSummary.pdf**
166K

 **Invoice-2053-290921.pdf**
166K



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Toby

3 messages

Heather & Josh Gum <gumranch@gmail.com>

Tue, Sep 28, 2021 at 8:47 PM

To: asfeigenbaum@gmail.com

Good evening, I am confirming drop off tomorrow morning for Toby. Can he be dropped off sometime between 7:15 and 7:45 AM. We have to leave after that to drop off the kids at school and won't be back until after 8:30 AM.

Heather Juracich
Heather & Josh's Pet Care
Gum Ranch-HJG Inc.
510.219.3786

Ariel Feigenbaum <asfeigenbaum@gmail.com>

Tue, Sep 28, 2021 at 9:21 PM

To: Heather & Josh Gum <gumranch@gmail.com>

Hi Heather,
Not a problem. I will come by 7:30 the latest. How long should I plan to be there since it's his first drop off/trial day? I have a call at 8am- is 30 minutes enough time for the tour and initial conversations?

Thanks,
Ariel

> On Sep 28, 2021, at 8:47 PM, Heather & Josh Gum <gumranch@gmail.com> wrote:

>
>

[Quoted text hidden]

Heather & Josh Gum <gumranch@gmail.com>

Tue, Sep 28, 2021 at 9:44 PM

To: Ariel Feigenbaum <asfeigenbaum@gmail.com>

Awesome, it shouldn't take any more than 15 to 20 minutes.

Heather Juracich
Heather & Josh's Pet Care
Gum Ranch-HJG Inc.
510.219.3786

> On Sep 28, 2021, at 9:21 PM, Ariel Feigenbaum <asfeigenbaum@gmail.com> wrote:

>

> Hi Heather,

[Quoted text hidden]

1634 Telegraph Ave., #3, Oakland, CA, 94612
PHONE (510) 420-8455 FAX (510) 858-5953

Exhibit B



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Pet Care Portal

1 message

Heather & Josh's Pet Care <gumranch@gmail.com>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com

Thu, Sep 23, 2021 at 10:40 AM

Hi Ariel,

ENJOY A BRAND NEW ONLINE EXPERIENCE WITH Heather & Josh's Pet Care online Client Portal.

Heather & Josh's Pet Care is pleased to announce the arrival of our brand new online scheduling system, which is designed to provide you with a more convenient and improved customer experience.

By logging onto your online account you will immediately have access to a range of new services including;

- Requesting and canceling services online using our advanced booking system.
- Viewing your schedule to ensure that we have the correct services booked for you.
- Uploading your favorite pet photos.
- Adding and updating your own account information.
- Providing us with details of an emergency contact.
- Telling us about your pets and their care requirements.
- Viewing all your past invoices and payments.

IMPORTANT: Please go to YOUR DATA on the menu and fill out the "Veterinary Treatment Authorization".

To login to your account please follow this link and click "create password".
<http://0206heatherandjoshspetcare.petsoftware.net/clientportal?account=1444001719>

You can log in with either your 10 digit account number which is 1444001719 or with the email address that we have on file for you. If you do not yet have a password or you have forgotten your password please click 'Create Password' or 'Forgotten password' after following the link.

If you have any questions about using your online account please just reply to this email and we will be very pleased to help you.

We value your business and welcome your comments about our service.

With best regards,

Heather & Josh

Heather Juracich
Heather & Josh's Pet Care
Email: gumranch@gmail.com
Phone: 510-219-3786



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Contact info blank

2 messages

Josh & Heather Gum <gumranch@gmail.com>
To: asfeigenbaum@gmail.com

Wed, Jan 5, 2022 at 9:37 AM

Good morning,

Your portal profile does not have your contact info other than this email.

If you could please complete all contact information that would be much appreciated.
Not sure how it slipped through the cracks?

I'm taking Toby with me to my dog training all day and I'll be back later this evening. I will drop him off on my way home.

Most likely it will be sometime between 730 and 8 PM.

Josh B. Gum
Heather & Josh's Pet Care
Professional Pet Services
(925) 388-2042 iPhone
(925) 988-9922 Fax
gumranch@gmail.com
www.heatherspetcare.com

PICKUP & DROP OFF:

Weekday Hours:
7-10 am & 4-7 pm

Saturday: 8 am - 11 am

Sunday: Closed

Ariel Feigenbaum <asfeigenbaum@gmail.com>
To: Josh & Heather Gum <gumranch@gmail.com>

Wed, Jan 5, 2022 at 10:40 AM

Hey Josh,
Sorry about that, not sure how I missed that. My cell is 516-359-8843 and our address is 3436 Moraga Blvd, Lafayette, CA 94549. I have added it to the portal as well.

Sounds like an exciting day for Toby- interested to hear how it goes.

I will be home all night- call my cell if you need me to come get him for some reason.

Thanks,
Ariel
[Quoted text hidden]

1634 Telegraph Ave., #3, Oakland, CA, 94612
PHONE (510) 420-8455 FAX (510) 858-5953

Exhibit C



Heather & Josh's Pet Care

Invoice

Ariel Feigenbaum
3436 Moraga Blvd.
Lafayette, CA 94549

01/28/2022

Invoice No. 2377

Day	Date	Description	Qty	Each (Net)	Amount
Tue	02/08/2022 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Wed	02/09/2022 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Thu	02/10/2022 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Fri	02/11/2022 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
				Net (USD)	160.00
				Payment Processing Fee (0%) (USD)	0.00
				<u>Gross (USD)</u>	<u>160.00</u>

Payment Terms

This invoice is due by 02/08/2022.

If you have any questions about this invoice please email us at gumranch@gmail.com or phone/text us 510-219-3786.

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, credit cards, check, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com



Heather & Josh's Pet Care

Invoice

Ariel Feigenbaum
3436 Moraga Blvd.
Lafayette, CA 94549

01/29/2022

Invoice No. 2381

Day	Date	Description	Qty	Each (Net)	Amount
Tue	02/08/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
Wed	02/09/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
Thu	02/10/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
Fri	02/11/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
				Net (USD)	168.00
				Payment Processing Fee (0%) (USD)	0.00
				Gross (USD)	168.00

Payment Terms

This invoice is now due.

If you have any questions about this invoice please email us at gumranch@gmail.com or phone/text us 510-219-3786.

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, credit cards, check, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com



Heather & Josh's Pet Care

Invoice

Ariel Feigenbaum
3436 Moraga Blvd.
Lafayette, CA 94549

02/10/2022

Invoice No. 2420

Day	Date	Description	Qty	Each (Net)	Amount
Tue	02/08/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
Wed	02/09/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
Thu	02/10/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
Fri	02/11/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi* CANCELLED	1	0.00	0.00
				Net (USD)	126.00
				Payment Processing Fee (0%) (USD)	0.00
				Gross (USD)	126.00

Payment Terms

This invoice is now due.

If you have any questions about this invoice please email us at gumranch@gmail.com or phone/text us 510-219-3786.

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, credit cards, check, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com



Heather & Josh's Pet Care

Invoice

Ariel Feigenbaum

12/02/2021

Invoice No. 2236

Day	Date	Description	Qty	Each (Net)	Amount
Mon	12/06/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Tue	12/07/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Wed	12/08/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Thu	12/09/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Fri	12/10/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Wed	12/15/2021	1. Boarding 1Dog \$60 (add times to note fields)	1	60.00	60.00
Thu	12/16/2021	1. Boarding 1Dog \$60 (add times to note fields)	1	60.00	60.00
Fri	12/17/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Net (USD)					360.00
Payment Processing Fee (0%) (USD)					0.00
Gross (USD)					360.00

Payment Terms

This invoice is due by 12/06/2021.

If you have any questions about this invoice please email us at gumranch@gmail.com or phone/text us 510-219-3786.

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, credit cards, check, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com



Account Summary

Ariel Feigenbaum

11/03/2021

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, check, credit or debit cards, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com

We appreciate your business and value your comments.

PAYMENTS DUE NOW						
Inv. Date	Service Start	Item	Total	Credits	Outstanding	Due Date
			0.00	0.00	0.00	
					Total (USD)	0.00
You have nothing to pay						

PAYMENTS NOT YET DUE						
Inv. Date	Service Start	Item	Total	Credits	Outstanding	Due Date
11/03/2021	11/30/2021	Invoice 2147	160.00	0.00	160.00	11/30/2021
					Total (USD)	160.00

If you have any questions about your account please email us at gumranch@gmail.com or phone/text us 510-219-3786.



Heather & Josh's Pet Care

Invoice

Ariel Feigenbaum

11/03/2021

Invoice No. 2147

Day	Date	Description	Qty	Each (Net)	Amount
Tue	11/30/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Tue	12/07/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Tue	12/14/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Tue	12/21/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
				Net (USD)	160.00
				Payment Processing Fee (0%) (USD)	0.00
				Gross (USD)	160.00

Payment Terms

This invoice is due by 11/30/2021.

If you have any questions about this invoice please email us at gumranch@gmail.com or phone/text us 510-219-3786.

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, credit cards, check, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com



Heather & Josh's Pet Care

Invoice

Ariel Feigenbaum

09/29/2021

Invoice No. 2053

Day	Date	Description	Qty	Each (Net)	Amount
Wed	09/29/2021 7:00am- 7:30am	4. \$40 Meet'n Greet Screening Daycare (Tue, Wed, Thur 7-9am)	1	40.00	40.00
				Net (USD)	40.00
				Payment Processing Fee (0%) (USD)	0.00
				Gross (USD)	40.00

Payment Terms

This invoice is now due.

If you have any questions about this invoice please email us at gumranch@gmail.com or phone/text us 510-219-3786.

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, credit cards, check, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com



Account Summary

Ariel Feigenbaum

09/29/2021

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, check, credit or debit cards, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com

We appreciate your business and value your comments.

PAYMENTS DUE NOW							
Inv. Date	Service Start	Item	Total	Credits	Outstanding	Due Date	
09/29/2021	09/29/2021	Invoice 2053	40.00	0.00	40.00	09/29/2021	
			Total (USD)		40.00		

If you have any questions about your account please email us at gumranch@gmail.com or phone/text us 510-219-3786.



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Confirmation of scheduled services for Toby account number 1444001719

1 message

Heather & Josh's Pet Care <mailer@petssoftware.net>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com, golkpr@gmail.com

Wed, Nov 3, 2021 at 2:02 PM

The following services have now been scheduled (account Ariel Feigenbaum 1444001719):

Date	Day	Time	Service
11/30/2021	Tue	7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*
12/07/2021	Tue	7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*
12/14/2021	Tue	7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*
12/21/2021	Tue	7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*

Thank you for using Heather & Josh's Pet Care. We are delighted to let you know that the services you requested are now scheduled and confirmed.

The Admin Team

Heather & Josh's Pet Care
Tel: 510-219-3786
gumranch@gmail.com



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Invoice for Toby No. 2147

3 messages

Heather & Josh's Pet Care <mailer@petsoftware.net>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com, golkpr@gmail.com
Cc: gumranch@gmail.com

Wed, Nov 3, 2021 at 2:02 PM

Hi Ariel,

RE: LATEST ACCOUNT NOW DUE FOR PAYMENT

Please find attached your latest account summary and invoice information which you can access by clicking this link <http://0206heatherandjoshspetcare.petsoftware.net/clientportal?account=1444001719>

If you have any questions about your account please simply reply to this email.

We value your business and welcome your comments about our service.


With best regards,

Heather & Josh

Heather & Josh's Pet Care
Email: gumranch@gmail.com
Phone: 510-219-3786

2 attachments

 **LatestAccountSummary.pdf**
166K

 **Invoice-2147-031121.pdf**
166K

Ariel Feigenbaum <asfeigenbaum@gmail.com>
To: Heather & Josh Gum <gumranch@gmail.com>

Wed, Nov 3, 2021 at 2:27 PM

Hi Heather,
Can I please submit payment after each day of day care in case dates change vs. paying the full invoice at once?

Thank you,
Ariel
[Quoted text hidden]

Heather & Josh Gum <gumranch@gmail.com>
To: Ariel Feigenbaum <asfeigenbaum@gmail.com>

Wed, Nov 3, 2021 at 3:11 PM

Yes, no problem. :)

Heather Juracich
Heather & Josh's Pet Care
Gum Ranch-HJG Inc.

510.219.3786

On Nov 3, 2021, at 2:28 PM, Ariel Feigenbaum <asfeigenbaum@gmail.com> wrote:

[Quoted text hidden]



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Services requested for Toby account number 1444001719

1 message

Heather & Josh's Pet Care <mailer@petsoftware.net>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com, golkpr@gmail.com

Sun, Nov 14, 2021 at 9:17 PM

The following services have been requested for client Ariel Feigenbaum account number 1444001719

Date	Day	Time	Service	Notes
11/19/2021	Fri	7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm)	*NoTaxi*

**** PLEASE NOTE: All clients are REQUIRED to fill out the Veterinary Treatment Authorization form which you can find in the Client Portal under Your Data. If you have not yet filled out the form, please return to the portal and take care of this now by clicking here: <http://0206heatherandjoshspetcare.petsoftware.net/clientportal?account=1444001719> ****

Thank you for using Heather & Josh's Pet Care. We are delighted to have received your request for service.

Please note that while we will make every effort to fulfill every service request, your request is not yet confirmed. Please look out for another email which will confirm that we are able to provide your services.

The Admin Team

Heather & Josh's Pet Care
Tel: 510-219-3786
gumranch@gmail.com



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Weekly total owed for Toby

3 messages

Ariel Feigenbaum <asfeigenbaum@gmail.com>
To: Heather & Josh Gum <gumranch@gmail.com>

Thu, Dec 9, 2021 at 9:29 AM

Hi Heather- Can you please send me the final amount that we owe for Toby's daycare this past week? Want to make sure I venmo you the correct amount. The portal is a bit confusing since it has 2 invoices. I will venmo you as soon as I receive the total for the week.

Thank you,
Ariel

Heather & Josh Gum <gumranch@gmail.com>
To: Ariel Feigenbaum <asfeigenbaum@gmail.com>

Thu, Dec 9, 2021 at 10:03 AM

I have updated your invoices, one is for this week and then the other one is for next week, sorry about the confusion.

Heather Juracich
Heather & Josh's Pet Care
Gum Ranch-HJG Inc.
510.219.3786

> On Dec 9, 2021, at 9:30 AM, Ariel Feigenbaum <asfeigenbaum@gmail.com> wrote:
>
>
[Quoted text hidden]

Ariel Feigenbaum <asfeigenbaum@gmail.com>
To: Heather & Josh Gum <gumranch@gmail.com>

Thu, Dec 9, 2021 at 10:09 AM

No worries. I will get these taken care of today and then do next week after service.

Thanks for taking such good care of Toby!
Ariel

> On Dec 9, 2021, at 1:03 PM, Heather & Josh Gum <gumranch@gmail.com> wrote:
>
> I have updated your invoices, one is for this week and then the other one is for next week, sorry about the confusion.
[Quoted text hidden]

11:28
◀ Search



Search transactions ✕

Completed
2021

-  **Gum Ranch** **- \$40**
Dec 15 · 
"Toby 12/15/21"

-  **Gum Ranch** **- \$40**
Dec 14 · 
"Toby 12/13"

-  **Gum Ranch** **- \$80**
Dec 9 · 
"Toby invoice 2255"

-  **Gum Ranch** **- \$40**
Dec 1 · 
"Toby 11/31/21"

-  **Gum Ranch** **- \$40**
Nov 28 · 
"Toby outstanding balance"

-  **Gum Ranch** **- \$40**
Sep 29 · 
"Toby 9/29/21"



11:28
◀ Search


Search transactions X


Q Gum

Filter Payments received Payments s


Completed

2022

 Gum Ranch - \$126
Feb 10 · 📍
"Tues, weds, thurs for toby."


 Gum Ranch - \$80
Jan 20 · 📍
"Leash and 1/20"

 Gum Ranch - \$40
Jan 12 · 📍
"Toby 1/12/22"

 Gum Ranch - \$40
Jan 5 · 📍
"1/5 toby"

Completed

2021

 Gum Ranch - \$40
Dec 15 · 📍
"Toby 12/15/21"

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HARPER & ARMSTRONG, LLP
1634 Telegraph Ave., #3, Oakland, CA, 94612
PHONE (510) 420-8455 FAX (510) 858-5953

Exhibit D



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Toby no show today

5 messages

Ariel Feigenbaum <asfeigenbaum@gmail.com>

Thu, Feb 10, 2022 at 8:59 AM

To: Heather & Josh Gum <gumranch@gmail.com>, Dan <Golkpr@gmail.com>

Hi Heather,

Understand it is too late to cancel today, but we are going to keep Toby at home. Did something happen while he was there yesterday? He was nervous all night when Dan picked him up and started shaking when Dan went to bring him to camp this morning. Has he just been out playing with the dogs all day or was he doing training with Josh as well?

I just sent you a venmo for Tuesday, Wednesday and Thursday- so you should have received that a few minutes ago.

Please share an update if possible.

Thank you,
Ariel

Gum Ranch <gumranch@gmail.com>

Thu, Feb 10, 2022 at 9:06 AM

To: Ariel Feigenbaum <asfeigenbaum@gmail.com>

Hi Ariel,

Nothing out of the ordinary happened yesterday except he played really hard. He was with me all day except for when I crated them all for about 30 min. when I went to pick up the kids at school. He ran A LOT, we had a full house and there were a lot of dogs to play with, and he met new dogs. He did not do any training yesterday. I wonder if he was just over stimulated.

Heather Juracich
Heather & Josh's Pet Care-HJG Inc.
Gum Ranch
510.219.3786

[Quoted text hidden]

Ariel Feigenbaum <asfeigenbaum@gmail.com>

Thu, Feb 10, 2022 at 10:21 AM

To: Gum Ranch <gumranch@gmail.com>

Maybe. Thanks for the update. Sounds like he just needs a rest day.

On Feb 10, 2022, at 10:06 AM, Gum Ranch <gumranch@gmail.com> wrote:

Hi Ariel,

[Quoted text hidden]

Heather & Josh Gum <gumranch@gmail.com>

Thu, Feb 10, 2022 at 10:52 AM

To: Ariel Feigenbaum <asfeigenbaum@gmail.com>

Coming several days in a row may just be too much for him. But I do know he's having fun, maybe just too much LOL.

Heather Juracich
Heather & Josh's Pet Care
Gum Ranch-HJG Inc.
510.219.3786

On Feb 10, 2022, at 10:21 AM, Ariel Feigenbaum <asfeigenbaum@gmail.com> wrote:

[Quoted text hidden]

Ariel Feigenbaum <asfeigenbaum@gmail.com>
To: Dan Chamberlain <Golkpr@gmail.com>

Thu, Feb 10, 2022 at 2:36 PM

Begin forwarded message:

From: Heather & Josh Gum <gumranch@gmail.com>
Date: February 10, 2022 at 11:52:29 AM MST
To: Ariel Feigenbaum <asfeigenbaum@gmail.com>
Subject: Re: Toby no show today

Coming several days in a row may just be too much for him. But I do know he's having fun, maybe just too much LOL.

[Quoted text hidden]



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Payment Received

1 message

Heather & Josh's Pet Care <mailer@petsoftware.net>

Thu, Feb 10, 2022 at 8:58 AM

Reply-To: gumranch@gmail.com

To: asfeigenbaum@gmail.com, golkpr@gmail.com

Cc: gumranch@gmail.com

Hi Ariel,

Thank you for your recent payment of \$126.00 which we confirm has now been added to your account.

If you have any questions or require further information please don't hesitate to get in touch either by replying to this email or using the contact numbers below.

We value your business and welcome your comments about our service.

With best regards,

Heather

Heather Juracich

Heather & Josh's Pet Care

Email: gumranch@gmail.com

Phone: 510-219-3786



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Service Cancellation Confirmation

1 message

Heather & Josh's Pet Care <mailer@petssoftware.net>

Thu, Feb 10, 2022 at 8:50 AM

Reply-To: gumranch@gmail.com

To: asfeigenbaum@gmail.com, golkpr@gmail.com

Client: Ariel Feigenbaum (1444001719) has cancelled the following service:

02/11/2022 7:00am-7:00pm 1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*

Thank you for using Heather & Josh's Pet Care. The above listed service is now cancelled.

The Admin Team

Heather & Josh's Pet Care

Tel: 510-219-3786

gumranch@gmail.com



Contra Costa County Department of Conservation & Development
Code Enforcement Cases for Parcel: 169021004
 Activity as of : 5/11/2023

Code enforcement cases shown on this report reflect code enforcement cases issued from our computer systems beginning 1/1/1980.

Case #	File Date	Record Type	Address	Work Description	Current Status/ Status Date
CECF22-00832	12/1/2022	Enforcement/Buildin g Zoning CF	3131 WITHERS AVE	Construction of a fence over 7' in height	Notice to Comply 12/1/2022
BIRF20-00833	9/30/2020	Enforcement/Buildin g Zoning (RF)	3131 WITHERS AVE	home business of batting cage and kennel on property	Closed 2/17/2021
BIRF13-00524	7/12/2013	Enforcement/Buildin g (RF)	3131 WITHERS AVE	Reroof without permit and variance conditions not completed	Closed 2/24/2014
BIRF06-01345	11/8/2006	Enforcement/Buildin g (RF)	3131 WITHERS AVE	Installation of fence ove six (6) feet in height with electrical wiring for automatic gate, large structure built in back, installation of irrigation system with out permits, keeping of horses and operating of business.	Closed 4/7/2016

Contra Costa County Department of Conservation & Development Building Permit Activity for Parcel: 169021004

Activity as of : 5/10/2023

Permits shown on this report reflect permits issued from our computer systems beginning 1/1/1980. Permits issued prior to 1/1/1980 will be produced separately if found on microfilm or in the document archive system.

Permit #	File Date	Permit Type	Address	Work Description	Job Valuation	Contractor	Status/Status Date	Record Status Comment
BIM17-010330	9/25/2017	Building/Residential/ M/Misc. Mechanical	3131 WITHERS AVE	REMOVE AND REPLACE FURNACE AND COIL.	3,000.00	ON-TIME AIR CONDITIONING & HEATING INC	Expired 3/24/2018	Batch
BIM16-004615	5/16/2016	Building/Residential/ M/Misc. Mechanical	3131 WITHERS AVE	4 TON HEAT PUMP CUT IN AND AIR HANDLER WITH 4K BTUS CHANGE OUT. DUCT WORK SUPPLY 11 AND 1 RETURN.	15,999.00	ON-TIME AIR CONDITIONING & HEATING INC	Finald 10/6/2016	Finald by Script
BIPVR15-010163	9/30/2015	Building/Residential/ PVR/Photovoltaic Residential	3131 WITHERS AVE	PV SOLAR, ROOF MOUNT, 14.56kwDC, (52) MODULES ** 11-3-15 -- TO INCLUDE METER CHANGEOUT, 200amp -- BDB **	0.00	RONALD B MC CLINTOCK	Finald 11/12/2015	Finald by Script
BIPVR15-010163	9/30/2015	Building/Residential/ PVR/Photovoltaic Residential	3131 WITHERS AVE	PV SOLAR, ROOF MOUNT, 14.56kwDC, (52) MODULES ** 11-3-15 -- TO INCLUDE METER CHANGEOUT, 200amp -- BDB **	0.00	RONALD B MC CLINTOCK	Finald 11/12/2015	Waiting for plans to be distributed.
BIMIR13-008541	10/7/2013	Building/Residential/ MIR/Miscellaneous Residential	3131 WITHERS AVE	8 FOOT PERIMETER FENCE FOR PROPERTY	15,000.00		Finald 10/31/2013	8-ft tall fence within required side and rear yard setbacks. Approved per VR13-1025.
BIMIR13-008541	10/7/2013	Building/Residential/ MIR/Miscellaneous Residential	3131 WITHERS AVE	8 FOOT PERIMETER FENCE FOR PROPERTY	15,000.00		Finald 10/31/2013	Finald by Script
BIMIR13-007356	8/28/2013	Building/Residential/ MIR/Miscellaneous Residential	3131 WITHERS AVE	TRELLIS	16,000.00		Finald 10/31/2013	Finald by Script
BIR13-005786	7/11/2013	Building/Residential/ RR/Re-Roof	3131 WITHERS AVE	40 SQUARES - TEAR OFF SHAKE AND INSTALL COMPOSITION SHINGLE	15,920.00		Finald 7/16/2013	Finald by Script
BI390401	10/27/2006	Building/Residential/ MIR/Miscellaneous Residential	3131 WITHERS AVE	6' TALL FENCE WITH 2" LATTICE --- 8' HIGH TOTAL.-- PER PLANS.		FENCE AMERICA INC	Withdrawn 12/1/2010	Withdrawn by Admin, due to new fee schedule
BI390403	10/27/2006	Building/Residential/ MIR/Miscellaneous Residential	3131 WITHERS AVE	NEW PERGOLA PER PLANS.		A & J FENCING	Withdrawn 12/1/2010	Withdrawn by Admin, due to new fee schedule
BIAD0000147539	9/20/1988	Building/Residential/ AD/Single Family Addition	3131 WITHERS AVE	BATHROOM ADDITION	6,840.00	CARVAJAL CONST	Finald	DC000002

Contra Costa County Department of Conservation & Development
Code Enforcement Cases for Parcel: 169021004
 Activity as of : 5/11/2023

Code enforcement cases shown on this report reflect code enforcement cases issued from our computer systems beginning 1/1/1980.

Case #	File Date	Record Type	Address	Work Description	Current Status/ Status Date
CECF22-00832	12/1/2022	Enforcement/Buildin g Zoning CF	3131 WITHERS AVE	Construction of a fence over 7' in height	Notice to Comply 12/1/2022
BIRF20-00833	9/30/2020	Enforcement/Buildin g Zoning (RF)	3131 WITHERS AVE	home business of bathing cage and kennel on property	Closed 2/17/2021
BIRF13-00524	7/12/2013	Enforcement/Buildin g (RF)	3131 WITHERS AVE	Reroof without permit and variance conditions not completed	Closed 2/24/2014
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Contra Costa County Department of Conservation & Development Building Permit Activity for Parcel: 169021004

Activity as of :5/10/2023

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B1390401	10/27/2006	Building/Residential/ MIR/Miscellaneous Residential	3131 WITHERS AVE	6' TALL FENCE WITH 2' LATTICE -- 8' HIGH TOTAL.-- PER PLANS.		FENCE AMERICA INC	Withdrawn 12/11/2010	Withdrawn by Admin, due to new fee schedule
B1390403	10/27/2006	Building/Residential/ MIR/Miscellaneous Residential	3131 WITHERS AVE	NEW PERGOLA PER PLANS.		A & J FENCING	Withdrawn 12/11/2010	Withdrawn by Admin, due to new fee schedule
BIAD0000147539	9/20/1988	Building/Residential/ AD/Single Family Addition	3131 WITHERS AVE	BATHROOM ADDITION	6,840.00	CARVAJAL CONST	Finald	DC000004

COMPEX LEGAL SERVICES
AFFIDAVIT - (Pursuant to Cal Evidence Code 1561)

CA1126737-003

I hereby declare under penalty of perjury under the laws of the State of California that the following statements are true to the best of my knowledge and belief.

I am over the age of 18 and the duly authorized custodian of records for:

CONTRA COSTA CO. CONSERVATION & DEVELOPMENT
30 MUIR ROAD, ATTN: APPLICATION AND PERMIT CENTER, MARTINEZ,
CA 94553

and have the authority to certify that the records made available to COMPEX LEGAL SERVICES for reproducing are all of the records under my custody and control, described and called for in the SUBPOENA/Authorization served with this declaration in the matter relating to said individual or thing pertaining to:

RECORDS OF: HJG, INC.

AKA:


DATE OF BIRTH:

SOCIAL SECURITY#:

HOW ORIGINAL RECORDS WERE PREPARED	
<input type="checkbox"/> HANDWRITTEN NOTES	<input type="checkbox"/> TYPED/DATA ENTERED
<input type="checkbox"/> TRANSCRIBED	<input checked="" type="checkbox"/> OTHER <u>Digital</u>

TYPE OF RECORDS PRODUCED			
<input type="checkbox"/> MEDICAL	<input type="checkbox"/> BILLING	<input type="checkbox"/> FILMS	<input type="checkbox"/> INSURANCE
<input type="checkbox"/> EMPLOYMENT	<input type="checkbox"/> PAYROLL	<input type="checkbox"/> SCHOLASTIC	
<input checked="" type="checkbox"/> OTHER <u>Building / Code</u>			

Said records were prepared by personnel of the business in the ordinary course of business at or near the time of the act, condition, or event. I have delivered all of the records/items requested with the following exception(s):

<u>Gabriel Rodriguez</u> CUSTODIAN NAME (PLEASE PRINT)	425 - 655 - 2796 PHONE NUMBER
 SIGNATURE OF CUSTODIAN	5/11/2023 DATE

I AM THE ATTORNEY'S REPRESENTATIVE AND I STATE THAT I MADE TRUE COPIES OF ALL THE ORIGINAL RECORDS DELIVERED TO ME BY THE CUSTODIAN OF RECORDS OF THE ABOVE LOCATION.

I DECLARE UNDER PENALTY OF PERJURY & UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

DATE	SIGNATURE	PRINT NAME
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PURSUANT TO BUSINESS & PROFESSIONS CODE SECTION 22462, I WILL MAINTAIN THE INTEGRITY & CONFIDENTIALITY OF ANY AND ALL INFORMATION OBTAINED, AND DISTRIBUTE THE RECORDS COPIED BY COMPEX LEGAL SERVICES TO THE AUTHORIZED PERSON OR ENTITIES.

Contra Costa County Department of Conservation & Development
Code Enforcement Cases for Parcel: 169021004
 Activity as of :5/11/2023

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Contra Costa County Department of Conservation & Development

Building Permit Activity for Parcel: 169021004


Activity as of : 5/10/2023

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BIAD0000147539	9/20/1988	Building/Residential/ AD/Single Family Addition	3131 WITHERS AVE	BATHROOM ADDITION	6,840.00	CARVAJAL CONST	Finald	DC000007

...
 This business has not enabled messaging on Yelp, but you can still contact other businesses like them.
 Start request

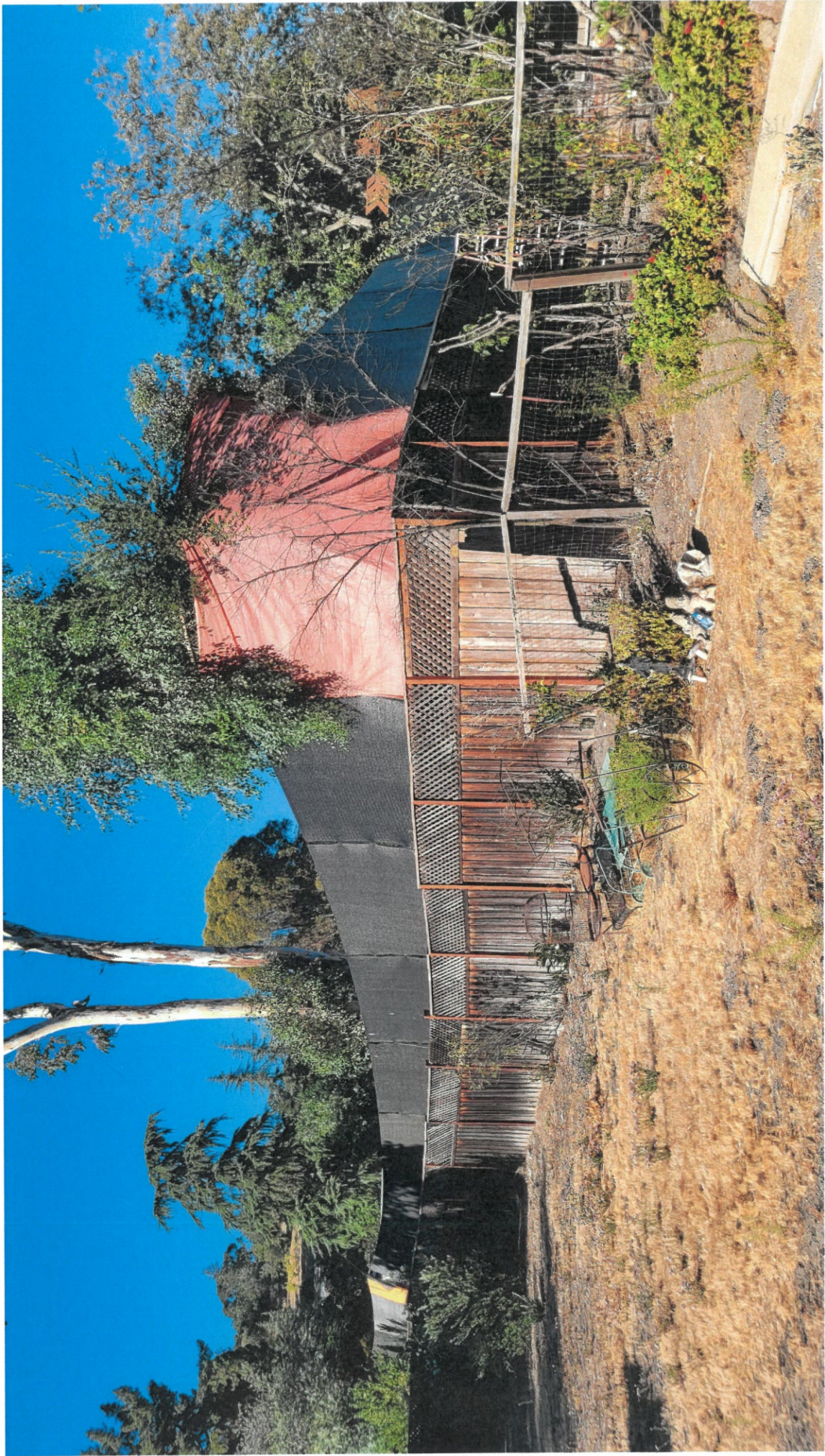
...
 if I could give zero stars, I would. I don't recommend leaving your precious dogs with a place with such poor communication. Not open on Sunday so you're required to board an extra night and pick up Monday morning. Very convenient for those working. My final straw was their inability to communicate after repeated messages via various communication forms. There are other options in Lamornda.
<http://www.heatherspetcare.com>
 (925) 388-2042

Useful 2 Funny Cool

Shaida S.
 Foster City, CA
 @ 48 @ 79 @ 7
 12/25/2022

...
 This place doesn't need or want any new business. My husband called and spoke to Josh on Monday to discuss long term care boarding. Less than a minute into the conversation Josh said he would call my husband back in 15 minutes. 5 days later he still hasn't called back.
 Verify This Business
 Verify to immediately update business information, respond to reviews, and more!

...
You Might Also Consider
 Sponsored ⓘ

Animal Medical Center San Rafael



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HARPER & ARMSTRONG, LLP
1634 Telegraph Ave., #3, Oakland, CA, 94612
PHONE (510) 420-8455 FAX (510) 858-5953

I, ARIEL FEIGENBAUM, hereby declare I have personal knowledge of the matters contained in this declaration and, if called as a witness to testify, I could and would competently testify thereto.

1. I live at 3436 Moraga Blvd., Lafayette, California.
2. My husband, Dan Chamberlain, and I have a Portuguese Water Dog named Toby.
3. My mother-in-law, Joan Chamberlain, has volunteered at the Lindsay Wildlife

Preserve, which is where she learned that Heather Juracich operates a doggy day care pet sitting business on her property at 3131 Withers.

4. My husband, Dan Chamberlain, and I were interested in finding a fun and safe place for Toby to spend time so we could work and travel for work.

5. We learned of the Gum Ranch/Heather’s Pet Care dog sitting business from my mother-in-law Joan Chamberlain.

6. In approximately September 29, 2021, my husband and I arranged to make our first visit to the property at 3131 Withers.

7. We scheduled an initial “meet and greet” pursuant to the procedures of the dog sitting business.

8. The service request we received from gumranch@gmail.com for this visit stated the regular price for the meet and greet visit is \$40, but we had to pay \$50, because our dog was too young to be neutered. A true and correct copy of the emails leading up to the meet and greet visit are attached hereto as **Exhibit A**.

9. Josh Gum and Heather Juracich met me and Toby at the property at 3131 Withers on September 29, 2021.

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10. The initial visit was an opportunity for us to see the environment where Toby would be staying during the day if we chose to become clients and an opportunity for Josh Gum and Heather Juracich to meet and assess our Toby.

11. We planned to leave Toby for daytime dog sitting, and it was my understanding that Josh Gum and Heather Juracich, if we needed it, would also provide overnight dog care.

12. On September 29, 2021, Josh Gum and Heather Juracich showed me around the property at 3131 Withers.

13. I am not entirely certain anymore whether it was both Josh Gum and Heather Juracich or just Josh Gum who gave me the entire tour. I do remember, however, that he (or they) showed me the large backyard/“farm” area of their yard where the animals ran around and had places to jump and climb.

14. He or they also took me inside a garage around the back of their house and showed me this inside area.

15. Inside the garage-type outbuilding, there were couches and several crates.

16. There was also a treadmill at the property.

17. We were interested in crate training Toby, so we liked the idea that he could spend some quiet time in a crate for part of the day.

18. I saw a minimum of five crates in the garage building.

19. While I was at 3131 Withers, Josh’s Belgian Malinois was on the property, and I believe there were a few other littler dogs running around.

20. We were able to check out how much space Toby would have to run around.

HARPER & ARMSTRONG, LLP
1634 Telegraph Ave., #3, Oakland, CA, 94612
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21. Josh and Heather were able to check out Toby’s ability to get along with other dogs and obey commands.

22. Following our “meet and greet” site visit on September 29, 2021, Josh and Heather accepted us and Toby as clients, and I signed Toby up to attend doggy day care at 3131 Withers.

23. I created an account on Josh and Heathers’s pet care portal at petsoftware.net. A true and correct copy of the email Josh and Heather sent to me on September 23, 2021, inviting me to sign into their client portal and of a January 5, 2021, follow-up email regarding our account are attached hereto as a part of **Exhibit B**.

24. The portal required me to provide information about Toby’s vaccination status and provide contact information for me and my husband and for Toby’s veterinarian.

25. On many days throughout approximately November and December 2021 and again in February 2022, Toby stayed at 3131 Withers during daytime work hours approximately 8:00 am – 6:00 pm. True and correct copies of invoices we received and paid along with records of payment are attached hereto as **Exhibit C**.

26. We paid Josh and Heather \$40/day for care.

27. When we dropped Toby off each day, Josh and/or Heather would meet Toby at the car in the driveway at 3131 Withers and take him into their yard.

28. When we picked Toby up, Josh and/or Heather would bring Toby to the car in the driveway at 3131 Withers.

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29. It was clear that Toby was spending his day with other dogs at the property at 3131 Withers. For example, a true and correct copy of the email exchange I had with Josh Gum on February 10, 2022, is attached hereto as **Exhibit D**. In it, he states:

“He [Toby] was with me all day except when I crated them all for about 30 min. when I went to pick up the kids at school. He ran A LOT, we had a full house and there were a lot of dogs to play with, and he met new dogs.”

30. Eventually Toby began to react badly to visiting Gumranch.

31. In approximately early February 2022, Toby began to seem distressed by the time he spent at Gumranch at 3131 Withers.

32. Because of Toby’s bad reaction to arriving at Gumranch, we stopped using the Gumranch dog day care service on approximately February 10, 2022.

33. I was angry that Josh Gum had put Toby on the treadmill or training without first discussing the plan with me and because he had taken Toby off the property in January 2022 without first obtaining my consent. (See Exhibit B.)

I declare under penalty of perjury under the laws of the State of California that the above statements are true and correct and that this Declaration was executed this 30th day of June, 2023, in Lafayette, Contra County, California.

DATED: June 30, 2023

DocuSigned by:
Ariel Feigenbaum
BB255FE9930642E...
Ariel Feigenbaum

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- Exhibit A: Emails leading up to the meet and greet visit in September 2021, and September 23, 2021, invoice for meet and greet visit
- Exhibit B: Invitation to join client portal and follow-up email regarding portal data
- Exhibit C: Invoices we received and paid for Toby's care during November 2021-February 2022 and Venmo records of payment
- Exhibit D: Email exchange I had with Josh Gum in February 10, 2022, regarding Toby's experience at Gumranch

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Exhibit A



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Services requested for Toby account number 1444001719

1 message

Heather & Josh's Pet Care <mailer@petsoftware.net>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com

Thu, Sep 23, 2021 at 10:53 AM

The following services have been requested for client Ariel Feigenbaum account number 1444001719

Date	Day	Time	Service	Notes
09/29/2021	Wed	7:00am-7:30am	4. \$40 Meet'n Greet Screening Daycare (Tue,Wed,Thur 7-9am)	Just spoke with Josh. Would like to bring Toby in for a meet and greet day. He is not yet neutered so I understand that the price is \$50. My partner, Dan, will be bringing Toby to the screening and picking him up.

**** PLEASE NOTE: All clients are REQUIRED to fill out the Veterinary Treatment Authorization form which you can find in the Client Portal under Your Data. If you have not yet filled out the form, please return to the portal and take care of this now by clicking here: <http://0206heatherandjoshspetcare.petsoftware.net/clientportal?account=1444001719> ****

Thank you for using Heather & Josh's Pet Care. We are delighted to have received your request for service.

Please note that while we will make every effort to fulfill every service request, your request is not yet confirmed. Please look out for another email which will confirm that we are able to provide your services.

The Admin Team

Heather & Josh's Pet Care
Tel: 510-219-3786
gumranch@gmail.com



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Confirmation of scheduled services for Toby account number 1444001719

2 messages

Heather & Josh's Pet Care <mailer@petsoftware.net>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com

Thu, Sep 23, 2021 at 10:55 AM

The following services have now been scheduled (account Ariel Feigenbaum 1444001719):

Date	Day	Time	Service
09/29/2021	Wed	7:00am-7:30am	4. \$40 Meet'n Greet Screening Daycare (Tue,Wed,Thur 7-9am)

Thank you for using Heather & Josh's Pet Care. We are delighted to let you know that the services you requested are now scheduled and confirmed.

The Admin Team

Heather & Josh's Pet Care
Tel: 510-219-3786
gumranch@gmail.com

Ariel Feigenbaum <asfeigenbaum@gmail.com>
To: gumranch@gmail.com, Dan <Golkpr@gmail.com>

Thu, Sep 23, 2021 at 11:02 AM

Thank you- what is your address? Dan will be bringing him by around 8:15am for the tour/visit and picking him up before 6:30pm.

Thank you,
Ariel
[Quoted text hidden]



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Business Hours

1 message

Heather & Josh's Pet Care <gumranch@gmail.com>

Thu, Sep 23, 2021 at 12:10 PM

Reply-To: gumranch@gmail.com

To: asfeigenbaum@gmail.com, golkpr@gmail.com

Business Hours:

Drop off and pick up hours are as follows:

*Monday through Friday

7 AM to 10 AM, or 4 PM to 7 PM

We are closed from 10:01am-3:59pm

*Saturday-8 AM to 11 AM only

*Sunday-Closed for drop off and pick up.

Please contact us if you have any questions.

Sincerely,

Heather & Josh's Pet Care



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Directions

1 message

Heather & Josh's Pet Care <gumranch@gmail.com>

Thu, Sep 23, 2021 at 12:11 PM

Reply-To: gumranch@gmail.com

To: asfeigenbaum@gmail.com, golkpr@gmail.com

Our address is:

3131 Withers Ave, Lafayette CA 94549

Please ring the blue button near the key pad and we will let you in. Drive all the way up the driveway to your right and we will come out to greet you. Please have your dog on a leash.

What to bring:

If you want to bring your own food, please put it in a Ziploc bag, or a plastic tub labeled with your dog's name and the amount per feeding. (ex. Charlie 1 cup 2x per day). You can also opt to have your dog eat our house food which is "Diamond Naturals Beef & Rice".

You may bring a blanket or bed if you like but, it must be something that is machine washable, and labeled with your dog's name. Please do not bring measuring cups, bowls, leashes, or any beloved toys...Bring items at your own risk. If you're bringing meds or supplements use bring a pillbox.

Please email with any questions.



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Invoice for Toby No. 2053

1 message

Heather & Josh's Pet Care <mailer@petsoftware.net>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com, golkpr@gmail.com
Cc: gumranch@gmail.com

Wed, Sep 29, 2021 at 2:49 PM

Hi Ariel,

RE: LATEST ACCOUNT NOW DUE FOR PAYMENT

Please find attached your latest account summary and invoice information which you can access by clicking this link
<http://0206heatherandjoshspetcare.petsoftware.net/clientportal?account=1444001719>

If you have any questions about your account please simply reply to this email.

We value your business and welcome your comments about our service.

With best regards,

Heather & Josh

Heather & Josh's Pet Care
Email: gumranch@gmail.com
Phone: 510-219-3786

2 attachments

 **LatestAccountSummary.pdf**
166K

 **Invoice-2053-290921.pdf**
166K



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Toby

3 messages

Heather & Josh Gum <gumranch@gmail.com>

Tue, Sep 28, 2021 at 8:47 PM

To: asfeigenbaum@gmail.com

Good evening, I am confirming drop off tomorrow morning for Toby. Can he be dropped off sometime between 7:15 and 7:45 AM. We have to leave after that to drop off the kids at school and won't be back until after 8:30 AM.

Heather Juracich
Heather & Josh's Pet Care
Gum Ranch-HJG Inc.
510.219.3786

Ariel Feigenbaum <asfeigenbaum@gmail.com>

Tue, Sep 28, 2021 at 9:21 PM

To: Heather & Josh Gum <gumranch@gmail.com>

Hi Heather,

Not a problem. I will come by 7:30 the latest. How long should I plan to be there since it's his first drop off/trial day? I have a call at 8am- is 30 minutes enough time for the tour and initial conversations?

Thanks,
Ariel

> On Sep 28, 2021, at 8:47 PM, Heather & Josh Gum <gumranch@gmail.com> wrote:

>
>

[Quoted text hidden]

Heather & Josh Gum <gumranch@gmail.com>

Tue, Sep 28, 2021 at 9:44 PM

To: Ariel Feigenbaum <asfeigenbaum@gmail.com>

Awesome, it shouldn't take any more than 15 to 20 minutes.

Heather Juracich
Heather & Josh's Pet Care
Gum Ranch-HJG Inc.
510.219.3786

> On Sep 28, 2021, at 9:21 PM, Ariel Feigenbaum <asfeigenbaum@gmail.com> wrote:

>

> Hi Heather,

[Quoted text hidden]

1634 Telegraph Ave., #3, Oakland, CA, 94612
PHONE (510) 420-8455 FAX (510) 858-5953

Exhibit B



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Pet Care Portal

1 message

Heather & Josh's Pet Care <gumranch@gmail.com>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com

Thu, Sep 23, 2021 at 10:40 AM

Hi Ariel,

ENJOY A BRAND NEW ONLINE EXPERIENCE WITH Heather & Josh's Pet Care online Client Portal.

Heather & Josh's Pet Care is pleased to announce the arrival of our brand new online scheduling system, which is designed to provide you with a more convenient and improved customer experience.

By logging onto your online account you will immediately have access to a range of new services including;

- Requesting and canceling services online using our advanced booking system.
- Viewing your schedule to ensure that we have the correct services booked for you.
- Uploading your favorite pet photos.
- Adding and updating your own account information.
- Providing us with details of an emergency contact.
- Telling us about your pets and their care requirements.
- Viewing all your past invoices and payments.

IMPORTANT: Please go to YOUR DATA on the menu and fill out the "Veterinary Treatment Authorization".

To login to your account please follow this link and click "create password".
<http://0206heatherandjoshspetcare.petsoftware.net/clientportal?account=1444001719>

You can log in with either your 10 digit account number which is 1444001719 or with the email address that we have on file for you. If you do not yet have a password or you have forgotten your password please click 'Create Password' or 'Forgotten password' after following the link.

If you have any questions about using your online account please just reply to this email and we will be very pleased to help you.

We value your business and welcome your comments about our service.

With best regards,

Heather & Josh

Heather Juracich
Heather & Josh's Pet Care
Email: gumranch@gmail.com
Phone: 510-219-3786



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Contact info blank

2 messages

Josh & Heather Gum <gumranch@gmail.com>

Wed, Jan 5, 2022 at 9:37 AM

To: asfeigenbaum@gmail.com

Good morning,

Your portal profile does not have your contact info other than this email.

If you could please complete all contact information that would be much appreciated.
Not sure how it slipped through the cracks?

I'm taking Toby with me to my dog training all day and I'll be back later this evening. I will drop him off on my way home.

Most likely it will be sometime between 730 and 8 PM.

Josh B. Gum
Heather & Josh's Pet Care
Professional Pet Services
(925) 388-2042 iPhone
(925) 988-9922 Fax
gumranch@gmail.com
www.heatherspetcare.com

PICKUP & DROP OFF:

Weekday Hours:
7-10 am & 4-7 pm

Saturday: 8 am - 11 am

Sunday: Closed

Ariel Feigenbaum <asfeigenbaum@gmail.com>

Wed, Jan 5, 2022 at 10:40 AM

To: Josh & Heather Gum <gumranch@gmail.com>

Hey Josh,
Sorry about that, not sure how I missed that. My cell is 516-359-8843 and our address is 3436 Moraga Blvd, Lafayette, CA 94549. I have added it to the portal as well.

Sounds like an exciting day for Toby- interested to hear how it goes.

I will be home all night- call my cell if you need me to come get him for some reason.

Thanks,

Ariel

[Quoted text hidden]

1634 Telegraph Ave., #3, Oakland, CA, 94612
PHONE (510) 420-8455 FAX (510) 858-5953

Exhibit C



Heather & Josh's Pet Care

Invoice

Ariel Feigenbaum
3436 Moraga Blvd.
Lafayette, CA 94549

01/28/2022

Invoice No. 2377

Day	Date	Description	Qty	Each (Net)	Amount
Tue	02/08/2022	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Wed	02/09/2022	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Thu	02/10/2022	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Fri	02/11/2022	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
				Net (USD)	160.00
				Payment Processing Fee (0%) (USD)	0.00
				Gross (USD)	160.00

Payment Terms

This invoice is due by 02/08/2022.

If you have any questions about this invoice please email us at gumranch@gmail.com or phone/text us 510-219-3786.

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, credit cards, check, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com



Heather & Josh's Pet Care

Invoice

Ariel Feigenbaum
3436 Moraga Blvd.
Lafayette, CA 94549

01/29/2022

Invoice No. 2381

Day	Date	Description	Qty	Each (Net)	Amount
Tue	02/08/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
Wed	02/09/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
Thu	02/10/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
Fri	02/11/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
				Net (USD)	168.00
				Payment Processing Fee (0%) (USD)	0.00
				Gross (USD)	168.00

Payment Terms

This invoice is now due.

If you have any questions about this invoice please email us at gumranch@gmail.com or phone/text us 510-219-3786.

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, credit cards, check, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com



Invoice

Ariel Feigenbaum
3436 Moraga Blvd.
Lafayette, CA 94549

02/10/2022

Invoice No. 2420

Day	Date	Description	Qty	Each (Net)	Amount
Tue	02/08/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
Wed	02/09/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
Thu	02/10/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*	1	42.00	42.00
Fri	02/11/2022 7:00am-7:00pm	1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi* CANCELLED	1	0.00	0.00
				Net (USD)	126.00
				Payment Processing Fee (0%) (USD)	0.00
				Gross (USD)	126.00

Payment Terms

This invoice is now due.

If you have any questions about this invoice please email us at gumranch@gmail.com or phone/text us 510-219-3786.

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, credit cards, check, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com



Heather & Josh's Pet Care

Invoice

Ariel Feigenbaum

12/02/2021

Invoice No. 2236

Day	Date	Description	Qty	Each (Net)	Amount	
Mon	12/06/2021	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00	
Tue	12/07/2021	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00	
Wed	12/08/2021	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00	
Thu	12/09/2021	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00	
Fri	12/10/2021	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00	
Wed	12/15/2021	1. Boarding 1Dog \$60 (add times to note fields)	1	60.00	60.00	
Thu	12/16/2021	1. Boarding 1Dog \$60 (add times to note fields)	1	60.00	60.00	
Fri	12/17/2021	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00	
					Net (USD)	360.00
					Payment Processing Fee (0%) (USD)	0.00
					Gross (USD)	360.00

Payment Terms

This invoice is due by 12/06/2021.

If you have any questions about this invoice please email us at gumranch@gmail.com or phone/text us 510-219-3786.

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, credit cards, check, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com



Account Summary

Ariel Feigenbaum

11/03/2021

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, check, credit or debit cards, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com

We appreciate your business and value your comments.

PAYMENTS DUE NOW						
Inv. Date	Service Start	Item	Total	Credits	Outstanding	Due Date
			0.00	0.00	0.00	
				Total (USD)	0.00	

You have nothing to pay

PAYMENTS NOT YET DUE						
Inv. Date	Service Start	Item	Total	Credits	Outstanding	Due Date
11/03/2021	11/30/2021	Invoice 2147	160.00	0.00	160.00	11/30/2021
				Total (USD)	160.00	

If you have any questions about your account please email us at gumranch@gmail.com or phone/text us 510-219-3786.



Heather & Josh's Pet Care

Invoice

Ariel Feigenbaum

11/03/2021

Invoice No. 2147

Day	Date	Description	Qty	Each (Net)	Amount
Tue	11/30/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Tue	12/07/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Tue	12/14/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
Tue	12/21/2021 7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*	1	40.00	40.00
				Net (USD)	160.00
				Payment Processing Fee (0%) (USD)	0.00
				Gross (USD)	160.00

Payment Terms

This invoice is due by 11/30/2021.

If you have any questions about this invoice please email us at gumranch@gmail.com or phone/text us 510-219-3786.

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, credit cards, check, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com



Heather & Josh's Pet Care

Invoice

Ariel Feigenbaum

09/29/2021

Invoice No. 2053

Day	Date	Description	Qty	Each (Net)	Amount
Wed	09/29/2021 7:00am- 7:30am	4. \$40 Meet'n Greet Screening Daycare (Tue,Wed,Thur 7-9am)	1	40.00	40.00
				Net (USD)	40.00
				Payment Processing Fee (0%) (USD)	0.00
				Gross (USD)	40.00

Payment Terms

This invoice is now due.

If you have any questions about this invoice please email us at gumranch@gmail.com or phone/text us 510-219-3786.

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, credit cards, check, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com



Account Summary

Ariel Feigenbaum

09/29/2021

Thank you for choosing Heather & Josh's Pet Care. Please find below your latest summary of payments due which you can save or print for your records. We accept cash, check, credit or debit cards, Venmo and PayPal "friends and family".

Please send Venmo and PayPal payments to: gumranch@gmail.com

We appreciate your business and value your comments.

PAYMENTS DUE NOW							
Inv. Date	Service Start	Item	Total	Credits	Outstanding	Due Date	
09/29/2021	09/29/2021	Invoice 2053	40.00	0.00	40.00	09/29/2021	
			Total (USD)		40.00		

If you have any questions about your account please email us at gumranch@gmail.com or phone/text us 510-219-3786.



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Confirmation of scheduled services for Toby account number 1444001719

1 message

Heather & Josh's Pet Care <mailer@petssoftware.net>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com, golkpr@gmail.com

Wed, Nov 3, 2021 at 2:02 PM

The following services have now been scheduled (account Ariel Feigenbaum 1444001719):

Date	Day	Time	Service
11/30/2021	Tue	7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*
12/07/2021	Tue	7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*
12/14/2021	Tue	7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*
12/21/2021	Tue	7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm) *NoTaxi*

Thank you for using Heather & Josh's Pet Care. We are delighted to let you know that the services you requested are now scheduled and confirmed.

The Admin Team

Heather & Josh's Pet Care
Tel: 510-219-3786
gumranch@gmail.com



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Invoice for Toby No. 2147

3 messages

Heather & Josh's Pet Care <mailer@petsoftware.net>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com, golkpr@gmail.com
Cc: gumranch@gmail.com

Wed, Nov 3, 2021 at 2:02 PM

Hi Ariel,

RE: LATEST ACCOUNT NOW DUE FOR PAYMENT

Please find attached your latest account summary and invoice information which you can access by clicking this link
<http://0206heatherandjoshspetcare.petsoftware.net/clientportal?account=1444001719>

If you have any questions about your account please simply reply to this email.

We value your business and welcome your comments about our service.


With best regards,

Heather & Josh

Heather & Josh's Pet Care
Email: gumranch@gmail.com
Phone: 510-219-3786

2 attachments

 **LatestAccountSummary.pdf**
166K

 **Invoice-2147-031121.pdf**
166K

Ariel Feigenbaum <asfeigenbaum@gmail.com>
To: Heather & Josh Gum <gumranch@gmail.com>

Wed, Nov 3, 2021 at 2:27 PM

Hi Heather,
Can I please submit payment after each day of day care in case dates change vs. paying the full invoice at once?

Thank you,
Ariel
[Quoted text hidden]

Heather & Josh Gum <gumranch@gmail.com>
To: Ariel Feigenbaum <asfeigenbaum@gmail.com>

Wed, Nov 3, 2021 at 3:11 PM

Yes, no problem. :)

Heather Juracich
Heather & Josh's Pet Care
Gum Ranch-HJG Inc.

510.219.3786

On Nov 3, 2021, at 2:28 PM, Ariel Feigenbaum <asfeigenbaum@gmail.com> wrote:

[Quoted text hidden]



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Services requested for Toby account number 1444001719

1 message

Heather & Josh's Pet Care <mailer@petssoftware.net>

Sun, Nov 14, 2021 at 9:17 PM

Reply-To: gumranch@gmail.com

To: asfeigenbaum@gmail.com, golkpr@gmail.com

The following services have been requested for client Ariel Feigenbaum account number 1444001719

Date	Day	Time	Service	Notes
11/19/2021	Fri	7:00am-7:00pm	1. Daycare 1Dog \$40 (hours 7-10am and 4-7pm)	*NoTaxi*

**** PLEASE NOTE: All clients are REQUIRED to fill out the Veterinary Treatment Authorization form which you can find in the Client Portal under Your Data. If you have not yet filled out the form, please return to the portal and take care of this now by clicking here: <http://0206heatherandjoshspetcare.petssoftware.net/clientportal?account=1444001719> ****

Thank you for using Heather & Josh's Pet Care. We are delighted to have received your request for service.

Please note that while we will make every effort to fulfill every service request, your request is not yet confirmed. Please look out for another email which will confirm that we are able to provide your services.

The Admin Team

Heather & Josh's Pet Care

Tel: 510-219-3786

gumranch@gmail.com



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Weekly total owed for Toby

3 messages

Ariel Feigenbaum <asfeigenbaum@gmail.com>
To: Heather & Josh Gum <gumranch@gmail.com>

Thu, Dec 9, 2021 at 9:29 AM

Hi Heather- Can you please send me the final amount that we owe for Toby's daycare this past week? Want to make sure I venmo you the correct amount. The portal is a bit confusing since it has 2 invoices. I will venmo you as soon as I receive the total for the week.

Thank you,
Ariel

Heather & Josh Gum <gumranch@gmail.com>
To: Ariel Feigenbaum <asfeigenbaum@gmail.com>

Thu, Dec 9, 2021 at 10:03 AM

I have updated your invoices, one is for this week and then the other one is for next week, sorry about the confusion.

Heather Juracich
Heather & Josh's Pet Care
Gum Ranch-HJG Inc.
510.219.3786

> On Dec 9, 2021, at 9:30 AM, Ariel Feigenbaum <asfeigenbaum@gmail.com> wrote:
>
>
[Quoted text hidden]

Ariel Feigenbaum <asfeigenbaum@gmail.com>
To: Heather & Josh Gum <gumranch@gmail.com>

Thu, Dec 9, 2021 at 10:09 AM

No worries. I will get these taken care of today and then do next week after service.

Thanks for taking such good care of Toby!
Ariel













> On Dec 9, 2021, at 1:03 PM, Heather & Josh Gum <gumranch@gmail.com> wrote:
>
> I have updated your invoices, one is for this week and then the other one is for next week, sorry about the confusion.
[Quoted text hidden]

11:28
Search



Search transactions X

Completed
2021

-  **Gum Ranch** - \$40
Dec 15 · 
"Toby 12/15/21"
-  **Gum Ranch** - \$40
Dec 14 · 
"Toby 12/13"
-  **Gum Ranch** - \$80
Dec 9 · 
"Toby invoice 2255"
-  **Gum Ranch** - \$40
Dec 1 · 
"Toby 11/31/21"
-  **Gum Ranch** - \$40
Nov 28 · 
"Toby outstanding balance"
-  **Gum Ranch** - \$40
Sep 29 · 
"Toby 9/29/21"

11:28
◀ Search


Search transactions X

Q Gum

Filter Payments received Payments s


Completed

2022

 Gum Ranch - \$126
Feb 10 · 📍
"Tues, weds, thurs for toby."


 Gum Ranch - \$80
Jan 20 · 📍
"Leash and 1/20"

 Gum Ranch - \$40
Jan 12 · 📍
"Toby 1/12/22"

 Gum Ranch - \$40
Jan 5 · 📍
"1/5 toby"

Completed

2021

 Gum Ranch - \$40
Dec 15 · 📍
"Toby 12/15/21"

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HARPER & ARMSTRONG, LLP
1634 Telegraph Ave., #3, Oakland, CA, 94612
PHONE (510) 420-8455 FAX (510) 858-5953

Exhibit D



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Toby no show today

5 messages

Ariel Feigenbaum <asfeigenbaum@gmail.com>

Thu, Feb 10, 2022 at 8:59 AM

To: Heather & Josh Gum <gumranch@gmail.com>, Dan <Golkpr@gmail.com>

Hi Heather,

Understand it is too late to cancel today, but we are going to keep Toby at home. Did something happen while he was there yesterday? He was nervous all night when Dan picked him up and started shaking when Dan went to bring him to camp this morning. Has he just been out playing with the dogs all day or was he doing training with Josh as well?

I just sent you a venmo for Tuesday, Wednesday and Thursday- so you should have received that a few minutes ago.

Please share an update if possible.

Thank you,
Ariel

Gum Ranch <gumranch@gmail.com>

Thu, Feb 10, 2022 at 9:06 AM

To: Ariel Feigenbaum <asfeigenbaum@gmail.com>

Hi Ariel,

Nothing out of the ordinary happened yesterday except he played really hard. He was with me all day except for when I crated them all for about 30 min. when I went to pick up the kids at school. He ran A LOT, we had a full house and there were a lot of dogs to play with, and he met new dogs. He did not do any training yesterday. I wonder if he was just over stimulated.

Heather Juracich
Heather & Josh's Pet Care-HJG Inc.
Gum Ranch
510.219.3786

[Quoted text hidden]

Ariel Feigenbaum <asfeigenbaum@gmail.com>

Thu, Feb 10, 2022 at 10:21 AM

To: Gum Ranch <gumranch@gmail.com>

Maybe. Thanks for the update. Sounds like he just needs a rest day.

On Feb 10, 2022, at 10:06 AM, Gum Ranch <gumranch@gmail.com> wrote:

Hi Ariel,

[Quoted text hidden]

Heather & Josh Gum <gumranch@gmail.com>

Thu, Feb 10, 2022 at 10:52 AM

To: Ariel Feigenbaum <asfeigenbaum@gmail.com>

Coming several days in a row may just be too much for him. But I do know he's having fun, maybe just too much LOL.

Heather Juracich
Heather & Josh's Pet Care
Gum Ranch-HJG Inc.
510.219.3786

On Feb 10, 2022, at 10:21 AM, Ariel Feigenbaum <asfeigenbaum@gmail.com> wrote:

[Quoted text hidden]

Ariel Feigenbaum <asfeigenbaum@gmail.com>
To: Dan Chamberlain <Golkpr@gmail.com>

Thu, Feb 10, 2022 at 2:36 PM

Begin forwarded message:

From: Heather & Josh Gum <gumranch@gmail.com>
Date: February 10, 2022 at 11:52:29 AM MST
To: Ariel Feigenbaum <asfeigenbaum@gmail.com>
Subject: Re: Toby no show today

Coming several days in a row may just be too much for him. But I do know he's having fun, maybe just too much LOL.

[Quoted text hidden]



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Payment Received

1 message

Heather & Josh's Pet Care <mailer@petssoftware.net>

Thu, Feb 10, 2022 at 8:58 AM

Reply-To: gumranch@gmail.com

To: asfeigenbaum@gmail.com, golkpr@gmail.com

Cc: gumranch@gmail.com

Hi Ariel,

Thank you for your recent payment of \$126.00 which we confirm has now been added to your account.

If you have any questions or require further information please don't hesitate to get in touch either by replying to this email or using the contact numbers below.

We value your business and welcome your comments about our service.

With best regards,

Heather

Heather Juracich

Heather & Josh's Pet Care

Email: gumranch@gmail.com

Phone: 510-219-3786



Ariel Feigenbaum <asfeigenbaum@gmail.com>

Service Cancellation Confirmation

1 message

Heather & Josh's Pet Care <mailer@petsoftware.net>
Reply-To: gumranch@gmail.com
To: asfeigenbaum@gmail.com, golkpr@gmail.com

Thu, Feb 10, 2022 at 8:50 AM

Client: Ariel Feigenbaum (1444001719) has cancelled the following service:

02/11/2022 7:00am-7:00pm 1. Daycare 1Dog \$42 (hours 7-10am and 4-7pm) *NoTaxi*

Thank you for using Heather & Josh's Pet Care. The above listed service is now cancelled.

The Admin Team

Heather & Josh's Pet Care
Tel: 510-219-3786
gumranch@gmail.com

IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
IN AND FOR THE COUNTY OF CONTRA COSTA

.....

**CERTIFIED
TRANSCRIPT**

JOSH GUM, ET AL.,

Plaintiff,

vs.

Case No.: C22-00927

RAYMOND LANE BARTLETT, ET AL.:

Defendants.

DEPOSITION OF HEATHER JURACICH

Tuesday, May 9, 2023

Stenographically Reported by:
MARY ANN SCANLAN, CSR NO. 8875 RDR-CRR-CCRR-CLR



Certified Shorthand Reporters

408 Columbus Avenue, Suite 2, San Francisco CA 94133

o / 415.834.1114 f / 415.399.9266

e / info@scanlanstone.com w / scanlanstone.com

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APPEARANCES

ATTORNEY FOR PLAINTIFFS JOSHUA GUM AND HEATHER JURACICH:

LAW OFFICES OF MARK R. MITTELMAN, PC

3478 Buskirk Avenue, Suite 262

Pleasant Hill, California 94523

925-256-0677

By: MARK R. MITTELMAN, attorney at Law

mmittelman@mittellaw.com

ATTORNEYS FOR DEFENDANTS RAYMOND BARTLETT and ANASTASIA
ALEXANDER:

HARPER & ARMSTRONG, LLP

1634 Telegraph Avenue, Suite #3

Oakland, California 94612

510-420-8455

By: ANDREW BRIMMER, Attorney at Law

Andrew.brimmer@harperarmstrong.com

SHONA ARMSTRONG, Attorney at Law

shona.armstrong@harperarmstrong.com

Also present: Josh Gum

:::~::~:

GUM vs BARTLETT

1 they're not, so --

2 BY MR. BRIMMER:

3 Q. When did you have that conversation where they
4 told you that the privacy screens were fine?

5 A. Speak with my husband. I do not recall the
6 dates.

7 Q. But you do recall being told more recently
8 that the county doesn't think that the privacy screens
9 are okay, correct?

10 A. And we --

11 Q. That is a yes-or-no question.

12 A. I believe so, yes.

13 Q. Okay. And when did you receive that
14 information?

15 A. I don't remember.

16 Q. Was it this year?

17 A. Yes.

18 Q. Was it this month? Was it in May of 2023?

19 A. No.

20 Q. Was it in April of 2023?

21 A. I don't remember. It was sometime in 2023,
22 March or April.

23 Q. March or April of 2023.

24 Do you remember what that notice said?

25 A. No.

GUM vs BARTLETT

1 Q. Did you read that notice?

2 A. No. I basically look at that stuff now and
3 just put it in a pile.

4 Q. Put it in a pile of what?

5 A. Of things to hand to my attorney.

6 Q. Oh, okay. So you didn't read it?

7 A. (Shakes head.)

8 Q. And after you received communication from the
9 county indicating that the privacy shades were not okay,
10 did you take any steps to give the county what they
11 want?

12 MR. MITTELMAN: Vague and ambiguous.

13 BY MR. BRIMMER:

14 Q. The tarps are still up, right?

15 A. Yeah.

16 Q. Why haven't you taken them down?

17 A. I don't know.

18 Q. Ever hear anyone complaining about people
19 rollerskating or skateboarding in your yard?

20 A. No.

21 Q. Can that be noisy sometimes?

22 A. Yes.

23 Q. The dog training that happens on your
24 property, has anyone ever complained about that?

25 A. No.



Useful 2 Funny Cool

Melissa F. Concord, CA @ 126 @ 11 @ 8

4/7/2023

if I could give zero stars, I would. I don't recommend leaving your precious dogs with a place with such poor communication. Not open on Sunday so you're required to board an extra night and pick up Monday morning. Very convenient for those working. My final straw was their inability to communicate after repeated messages via various communication forms. There are other options in Lamornda.

Useful Funny Cool

Shaida S. Foster City, CA @ 48 @ 79 @ 7

12/25/2022

This place doesn't need or want any new business. My husband called and spoke to Josh on Monday to discuss long term care boarding. Less than a minute into the conversation Josh said he would call my husband back in 15 minutes. 5 days later he still hasn't called back.

Useful Funny Cool

Kyle D. Pleasant Hill, CA @ 0 @ 1

1/27/2024

This business has not enabled messaging on Yelp, but you can still contact other businesses like them.

Start request

http://www.heatherspetcare.com

(925) 388-2042



Is this your business?

Verify to immediately update business information, respond to reviews, and more!

Verify This Business

You Might Also Consider

Sponsored



Contra Costa County Department of Conservation & Development
Code Enforcement Cases for Parcel: 169021004
 Activity as of : 5/11/2023

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BIRF13-00524	7/12/2013	Enforcement/Buildin g (RF)	3131 WITHERS AVE	Reroof without permit and variance conditions not completed	Closed 2/24/2014
BIRF06-01345	11/8/2006	Enforcement/Buildin g (RF)	3131 WITHERS AVE	Installation of fence ove six (6) feet in height with electrical wiring for automatic gate, large structure built in back, installation of irragation system with out permits, keeping of horses and operating of business.	Closed 4/7/2016

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BIM16-004615	5/16/2016	Building/Residential/ M/Misc. Mechanical	3131 WITHERS AVE	4 TON HEAT PUMP CUT IN AND AIR HANDLER WITH 4K BTUS CHANGE OUT. DUCT WORK SUPPLY 11 AND 1 RETURN.	15,999.00	ON-TIME AIR CONDITIONING & HEATING INC	Finald 10/6/2016	Finald by Script
BIPVR15-010163	9/30/2015	Building/Residential/ PVR/Photovoltaic Residential	3131 WITHERS AVE	PV SOLAR, ROOF MOUNT, 14.56kwDC, (52) MODULES ** 11-3-15 -- TO INCLUDE METER CHANGEOUT, 200amp -- BDB **	0.00	RONALD B MC CLINTOCK	Finald 11/12/2015	Finald by Script
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BIMIR13-008541	10/7/2013	Building/Residential/ MIR/Miscellaneous Residential	3131 WITHERS AVE	8 FOOT PERIMETER FENCE FOR PROPERTY	15,000.00		Finald 10/31/2013	8-ft tall fence within required side and rear yard setbacks. Approved per VR13-1025.
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BIMIR13-007356	8/28/2013	Building/Residential/ MIR/Miscellaneous Residential	3131 WITHERS AVE	TRELLIS	16,000.00		Finald 10/31/2013	Finald by Script
BIR13-005786	7/11/2013	Building/Residential/ RR/Re-Roof	3131 WITHERS AVE	40 SQUARES - TEAR OFF SHAKE AND INSTALL COMPOSITION SHINGLE	15,920.00		Finald 7/16/2013	Finald by Script
BI390401	10/27/2006	Building/Residential/ MIR/Miscellaneous Residential	3131 WITHERS AVE	6' TALL FENCE WITH 2' LATTICE --- 8' HIGH TOTAL.-- PER PLANS.		FENCE AMERICA INC	Withdrawn 12/1/2010	Withdrawn by Admin, due to new fee schedule
BI390403	10/27/2006	Building/Residential/ MIR/Miscellaneous Residential	3131 WITHERS AVE	NEW PERGOLA PER PLANS.		A & J FENCING	Withdrawn 12/1/2010	Withdrawn by Admin, due to new fee schedule
BIAD0000147539	9/20/1988	Building/Residential/ AD/Single Family Addition	3131 WITHERS AVE	BATHROOM ADDITION	6,840.00	CARVAJAL CONST	Finald	Finald DC000002

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COMPEX LEGAL SERVICES
AFFIDAVIT - (Pursuant to Cal Evidence Code 1561)

CA1126737-003

I hereby declare under penalty of perjury under the laws of the State of California that the following statements are true to the best of my knowledge and belief.

I am over the age of 18 and the duly authorized custodian of records for:

CONTRA COSTA CO. CONSERVATION & DEVELOPMENT
30 MUIR ROAD, ATTN: APPLICATION AND PERMIT CENTER, MARTINEZ,
CA 94553

and have the authority to certify that the records made available to COMPEX LEGAL SERVICES for reproducing are all of the records under my custody and control, described and called for in the SUBPOENA/Authorization served with this declaration in the matter relating to said individual or thing pertaining to:

RECORDS OF: HJG, INC.

AKA:


DATE OF BIRTH:

SOCIAL SECURITY#:

HOW ORIGINAL RECORDS WERE PREPARED			
<input type="checkbox"/> HANDWRITTEN NOTES	<input type="checkbox"/> TYPED/DATA ENTERED		
<input type="checkbox"/> TRANSCRIBED	<input checked="" type="checkbox"/> OTHER <u>Digital</u>		

TYPE OF RECORDS PRODUCED			
<input type="checkbox"/> MEDICAL	<input type="checkbox"/> BILLING	<input type="checkbox"/> FILMS	<input type="checkbox"/> INSURANCE
<input type="checkbox"/> EMPLOYMENT	<input type="checkbox"/> PAYROLL	<input type="checkbox"/> SCHOLASTIC	
<input checked="" type="checkbox"/> OTHER <u>Building / Code</u>			

Said records were prepared by personnel of the business in the ordinary course of business at or near the time of the act, condition, or event. I have delivered all of the records/items requested with the following exception(s):

<u>Gabriel Rodriguez</u> CUSTODIAN NAME (PLEASE PRINT)	<u>925-635-2796</u> PHONE NUMBER
 SIGNATURE OF CUSTODIAN	<u>5/11/2023</u> DATE

I AM THE ATTORNEY'S REPRESENTATIVE AND I STATE THAT I MADE TRUE COPIES OF ALL THE ORIGINAL RECORDS DELIVERED TO ME BY THE CUSTODIAN OF RECORDS OF THE ABOVE LOCATION.

I DECLARE UNDER PENALTY OF PERJURY & UNDER THE LAWS OF THE STATE OF CALIFORNIA THAT THE FOREGOING IS TRUE AND CORRECT.

<hr/> DATE	<hr/> SIGNATURE	<hr/> PRINT NAME
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PURSUANT TO BUSINESS & PROFESSIONS CODE SECTION 22462, I WILL MAINTAIN THE INTEGRITY & CONFIDENTIALITY OF ANY AND ALL INFORMATION OBTAINED, AND DISTRIBUTE THE RECORDS COPIED BY COMPEX LEGAL SERVICES TO THE AUTHORIZED PERSON OR ENTITIES.

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