

Cyndie M. Chang (SBN 227542)
Daniel M. Doft (SBN 317204)
DUANE MORRIS LLP
865 South Figueroa Street, Suite 3100
Los Angeles, CA 90017-5450
Telephone: +1 213 689 7400
Fax: +1 213 689 7401
E-mail:cmchang@duanemorris.com
ddoft@duanemorris.com

Attorneys for Defendants ANB Properties, LLC; Anthony N. Bushala; Bushala Brothers, Inc.; Bushala LLC; Rocky Road Rigging Inc., f.k.a. Maskell Rigging & Equipment Inc.; George K. Bushala, Jr.; GKB Jr., LLC; Harold Hamud; Salma Ann Bushala-Hamud; Salma Ann Bushala-Hamud and George K. Bushala Jr., as Trustees of the George K. and Sylvia Ann Bushala Legacy Trust under Trust Agreement dated March 31, 2006; Salma Ann Bushala-Hamud, as Trustee of the Salma Ann Bushala-Hamud Dynasty Trust under Trust Agreement dated March 31, 2006; SBH Cahuenga, LLC; SAB Management LLC; and 124 Wilshire LLC

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF ORANGE – CENTRAL JUSTICE CENTER

ALBERT BUSHALA, an individual,

Plaintiff,

v.

SALMA BUSHALA-HAMUD, an individual, and as Trustee of the BUSHALA LIVING TRUST, and the BUSHALA LEGACY TRUST, and the SAB DYNASTY TRUST; HAROLD HAMUD, an individual; GEORGE BUSHALA, JR., an individual; ANTHONY BUSHALA, an individual; SYLVIA BUSHALA, an individual; GEORGE BUSHALA, SR., an individual; BUSHALA BROTHERS, INC., a California corporation; BUSHALA, LLC, a California limited liability company; MASKELL RIGGING & EQUIPMENT, INC., a California corporation; SBH CAHUENGA, LLC, a California limited liability company; SAB MANAGEMENT, LLC, a California limited liability company; ANB PROPERTIES, LLC, a Nevada limited liability company, GKB JR., LLC, a Nevada limited liability company; WILSHIRE LLC, a California limited liability company; and DOES 1 through 50,

Defendants.

Case No. 30-2024-01430906-CU-NP-CJC

DEFENDANTS’ NOTICE OF MOTION AND MOTION TO QUASH THE DEPOSITION SUBPOENA DIRECTED TO LEON ALEXANDER (OR ALTERNATIVELY, FOR A PROTECTIVE ORDER REGARDING MR. ALEXANDER’S DEPOSITION); AND REQUEST FOR SANCTIONS PURSUANT TO CCP SECTIONS 1987.2(A) AND 2023.030(A)

Date: November 17, 2025

Time: 9:00 a.m.

Dept: W01

Judge: Julianne Bancroft

Reservation: 74599579

Complaint Filed: October 2, 2024

Amend. Compl. Filed: February 5, 2024

1 **TO THE COURT, ALL PARTIES, AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE THAT** on November 17, 2025, at 9:00 a.m., or as soon thereafter
3 as the matter may be heard, in Department W01 of the above-entitled Court, Certain Defendants
4 ANB Properties, LLC; Anthony N. Bushala; Bushala Brothers, Inc.; Bushala LLC; Rocky Road
5 Rigging Inc., f.k.a. Maskell Rigging & Equipment Inc.; George K. Bushala, Jr.; GKB Jr., LLC;
6 Harold Hamud; Salma Ann Bushala-Hamud; Salma Ann Bushala-Hamud and George K. Bushala
7 Jr., as Trustees of the George K. and Sylvia Ann Bushala Legacy Trust under Trust Agreement dated
8 March 31, 2006; Salma Ann Bushala-Hamud, as Trustee of the Salma Ann Bushala-Hamud Dynasty
9 Trust under Trust Agreement dated March 31, 2006; SBH Cahuenga, LLC; SAB Management LLC;
10 and 124 Wilshire LLC (collectively, “Defendants”) will and hereby do move to quash (or
11 alternatively, for a protective order regarding) the Subpoena for Personal Appearance and
12 Production of Business Records to some of Defendants’ attorney, Leon Alexander, dated May 30,
13 2025 (the “Subpoena”), calling for a personal appearance and production date of July 8, 2025.
14 Defendants move to quash the Subpoena on the basis that Mr. Alexander not only served as the
15 corporate attorney for various individuals and/or entities involved in transactions that are the subject
16 of this lawsuit, but he also served as a formal mediator to resolve the disputes underlying Plaintiff’s
17 lawsuit. His testimony and production of documents is therefore protected by the attorney-client
18 privilege, the duty of confidentiality, the attorney work product doctrine, and the mediation
19 privilege.

20 Additionally, Defendants seek monetary sanctions of \$9,230 against Plaintiff and his
21 attorneys for misuse of the discovery process.

22 The Motion to Quash will be and is based upon the grounds stated in this notice of motion
23 and motion to quash, the memorandum of points and authorities in support thereof, the separate
24 statement , the declarations of George K. Bushala, Jr., Anthony N. Bushala, Cyndie M. Chang, and
25 exhibits attached thereto, all pleadings and records on file in this action, all matters of which the
26 Court may or shall take judicial notice, and such other evidence and argument as may be presented
27 at or prior to the hearing on Defendants’ motion to quash.

28 ///

Respectfully submitted,

Dated: June 30, 2025

DUANE MORRIS LLP

By: /s/ Cyndie M. Chang
Cyndie M. Chang (SBN 227542)

Attorneys for Defendants ANB Properties, LLC;
Anthony N. Bushala; Bushala Brothers, Inc.; Bushala
LLC; Rocky Road Rigging Inc., f.k.a. Maskell
Rigging & Equipment Inc.; George K. Bushala, Jr.;
GKB Jr., LLC; Harold Hamud; Salma Ann Bushala-
Hamud; Salma Ann Bushala-Hamud and George K.
Bushala Jr., as Trustees of the George K. and Sylvia
Ann Bushala Legacy Trust under Trust Agreement
dated March 31, 2006; Salma Ann Bushala-Hamud,
as Trustee of the Salma Ann Bushala-Hamud Dynasty
Trust under Trust Agreement dated March 31, 2006;
SBH Cahuenga, LLC; SAB Management LLC; and
124 Wilshire LLC

Blanco, Raquel

From: Chang, Cyndie M.
Sent: Monday, June 30, 2025 3:31 PM
To: Martinez, Diane; Blanco, Raquel
Cc: Doft, Daniel M.
Subject: FW: Superior Court of California, County of Orange - Motion Reservation Request - CONFIRMATION

From: donotreply@occourts.org <donotreply@occourts.org>
Sent: Monday, June 30, 2025 3:25 PM
To: Chang, Cyndie M. <CMChang@duanemorris.com>
Subject: Superior Court of California, County of Orange - Motion Reservation Request - CONFIRMATION



Your reservation request has been CONFIRMED by the Superior Court. The hearing date and time below has been reserved. You will be asked to provide your reservation number to the court at a later date.

MOVING PAPERS MUST BE E-FILED WITHIN 24 HOURS AFTER COMPLETING THE ON-LINE RESERVATION. Failure to submit your moving papers within 24 hours will result in the automatic CANCELLATION of the reservation.

NOTE: To expedite your motion, please place the appropriate Court Reservation number (e.g. 7XXXXXXX) on each Motion being submitted. If multiple motions are submitted on one document, all reservations numbers must be listed on the face page of the pleading.

Please do not reply to this email.

Reservation Number:	74599579
---------------------	----------

Hearing Date:	November 17, 2025
Hearing Time:	9:00 AM
Department:	W01
Motion Type:	Motion to Quash

Case Number: 30-2024-01430906-CU-NP-WJC
Case Title: Bushala vs. Bushala-Hamud
Judicial Officer: Julianne Bancroft

Email: cmchang@duanemorris.com
Requestor Name: Cyndie Chang
Requestor Phone: 213-6899-7400
Filing Party: ANB Properties, LLC; Anthony N. Bushala; Bushala Brothers, Inc.; Bushala LLC;
Rocky Road Rigging Inc

Date of Request: June 30, 2025
Time of Request: 3:06 PM
Transaction Number: 1000556897
