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7 Attorney for Defendant ANTHONY GURKA

8
9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11 **HELPING HANDS FOR DIGNITY**
12 **COALITION, a Colorado non-profit**
13 **corporation**

14 Plaintiff,

15 vs.

16 **ANTHONY GURKA,**

17 Defendants.

No. 3:25-cv-06750-WHO

**DEFENDANT’S NON-OPPOSITION
TO ASSIGNMENT.**

18 **DEFENDANT’S STATEMENT OF NON-OPPOSITION TO ASSIGNMENT, WITH**
19 **EXPRESS RESERVATION OF RIGHTS**

20 Defendant respectfully submits this statement in response to the Court’s request regarding
21 assignment of this action to a federal court in the State of Florida. Defendant does not oppose
22 assignment or transfer of this action to an appropriate federal district court in Florida solely for
23 purposes of addressing the Court’s jurisdictional ruling and in the interest of judicial economy.
24 Defendant’s non-opposition is expressly limited to that purpose.

25 Defendant does not consent to personal jurisdiction, venue, or the legal sufficiency of
26 Plaintiff’s claims, and expressly reserves all rights, defenses, and objections available under the
27 Federal Rules of Civil Procedure and applicable law in the transferee court, including but not
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1 limited to all defenses under Rule 12, such as failure to state a claim upon which relief may be
2 granted, improper venue, statute of limitations, lack of standing, failure to join necessary parties,
3 and any other grounds for dismissal or relief.
4

5 Nothing in this filing shall be construed as a waiver of any substantive or procedural
6 defense, nor as an admission regarding the merits of Plaintiff's allegations. Defendant further
7 reserves the right to seek dismissal of this action, in whole or in part, in the transferee court.
8 Defendant submits this statement to clarify that its non-opposition to assignment or transfer shall
9 not be deemed consent or waiver of any defense, argument, or objection.
10

11 Respectfully Submitted

12 DATED this 17th day of December, 2025.

13 **THE LAW OFFICES OF STEVEN**
14 **VONDRAN, P.C.**

15 By /s/ Steve Vondran
16 Steven C. Vondran, Esq.
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CERTIFICATE OF SERVICE

ORIGINAL of the foregoing *e-filed* this
17th day of December 2025, to all registered ECF users:

Attorney for Plaintiff
Randall Newman, Esq.
99 Wall Street, Suite 3727
New York, NY 10005
rsn@randallnewman.net

Executed on December 17, 2025

By: /s/ Lisa Vondran
Lisa Vondran, Assistant