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**IN THE COURT OF APPEAL
OF THE STATE OF CALIFORNIA
FIFTH APPELLATE DISTRICT**

**CIVIL RIGHTS DEPARTMENT, FORMERLY THE
DEPARTMENT OF FAIR EMPLOYMENT AND HOUSING,
AN AGENCY OF THE STATE OF CALIFORNIA,**
Plaintiff and Appellant,

v.

**CATHY'S CREATIONS, INC., D/B/A TASTRIES,
A CALIFORNIA CORPORATION, AND
CATHARINE MILLER,**
Defendants and Respondents; and

**EILEEN RODRIGUEZ-DEL RIO AND
MIREYA RODRIGUEZ-DEL RIO,**
Real Parties in Interest.

**APPEAL FROM KERN COUNTY SUPERIOR COURT
J. ERIC BRADSHAW, JUDGE – CASE No. BCV-18-102633**

**RESPONDENTS' APPENDIX
File 8 of 8, Volume 8, pp. RA.1814-RA.2049**

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ENDORSED - FILED
in the office of the Secretary of State
of the State of California

DEC 20 2012

ARTICLES OF INCORPORATIONOFCATHY'S CREATIONS, INC.

Dept.: J

Case #

BCV-18-102633

Exhibit 115

exhibitsticker.com

1. Name. The name of this Corporation is: CATHY'S CREATIONS, INC.
2. Purpose. The purpose of this Corporation is to engage in any lawful act or activity for which a Corporation may be organized under the General Corporation Law of California other than the banking business, the trust company business or the practice of a profession permitted to be incorporated by the California Corporations Code.
3. Agent. The name and address in the State of California of this Corporation's initial agent for service of process is:

Catharine M. Miller
3665 Rosedale Highway
Bakersfield, California 93308
4. Stock. This Corporation is authorized to issue only one (1) class of shares of stock, and the total number of shares of such stock that this Corporation is authorized to issue is one hundred thousand (100,000).
5. Directors' Liability. The liability of the Corporation's directors for monetary damages shall be eliminated to the fullest extent permissible under California law.
6. Indemnification. The Corporation is authorized to indemnify the directors and officers of the Corporation to the fullest extent permissible under California law.

Dated: December 20, 2012

 GROVER H. WALDON
 Incorporator

110/B/72210-3/FORMATION/ARTICLES

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CM-0001

BY LAWS
OF
CATHY'S CREATIONS, INC.

PREAMBLE

This document is the By-Laws of CATHY'S CREATIONS, INC., a California Corporation, as approved by its Board of Directors pursuant to the General California Corporation Law at a duly noticed and held meeting of such Directors. The original of these By-Laws and any amendments shall be open to inspection by shareholders of this Corporation at all reasonable times during office hours. If the principal executive office of the Corporation is outside the State of California, and the Corporation has no principal business office in such state, the Corporation shall upon the written request of any shareholder furnish to such shareholder a copy of these By-Laws and any amendments hereto

ARTICLE I. OFFICES

1.01 Principal Executive Office: The principal executive office for the transaction of business of the corporation shall be located at 3665 Rosedale Highway, Bakersfield, California, 93308, which is the address where the Secretary of the Corporation certifies these By-Laws as indicated on the last page hereof. The Board of Directors (hereinafter called "Board") has full power and authority to change the principal executive office from one location to another by amending these By-Laws.

1.02 Other Offices: The Corporation may have additional offices at such other places, within or without the State of California, as the Board may from time to time designate.

ARTICLE II. SHAREHOLDERS' MEETINGS

2.01 Place of Meetings: All meetings of the shareholders shall be held at any office of the Corporation located in the State of California, or any other place within or without this State as may be designated in writing by the Board.

2.02 Annual Meetings: The annual meetings of the shareholders shall be held on the fifteenth (15th) day of the last month of the Corporation's fiscal year or

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such other time as may be fixed by the Board. However, should said day fall upon a Saturday, Sunday, or legal holiday observed by the Corporation, then any such annual meeting of shareholders shall be held at the same time and place on the next full business day thereafter.

2.03 Special Meetings: Special meetings of the shareholders for any purpose or purposes whatsoever may be called at any time by the President, the Board, or by one or more shareholders holding not less than ten percent (10%) of the voting power of the Corporation.

2.04 Notice of Meetings:

A. Time of Notice:

1. General Requirements: Written notice of each annual or special meeting of shareholders shall be given not less than ten (10) nor more than sixty (60) days before the date of the meeting to each shareholder entitled to vote thereat.

2. Call of Special Meeting: Upon request in writing to any member of the Board or any officer of the Corporation, by any person entitled to call a special meeting of shareholders, other than a director, the person receiving such a request shall forthwith cause notice to be given to the shareholders entitled to vote that a meeting will be held at a time requested by the person or persons calling the meeting, not less than thirty-five (35) nor more than sixty (60) days after the receipt of the request. If the notice is not given within twenty (20) days after receipt of the request, the persons entitled to call the meeting may give the notice.

B. Contents of Notice: The notice shall state the place, date, and hour of the meeting. In addition, in the case of a special meeting, the notice shall include the general nature of the business to be transacted, and that no other business may be transacted. In the case of the annual meeting, the notice shall include those matters which the Board, at the time of the mailing of the notice, intends to present for action by the shareholders. However, subject to the provisions of applicable law, any proper matter may be presented at the annual meeting for

action. The notice of any meeting at which directors are to be elected shall include the names of nominees intended at the time of the notice to be presented for election.

C. Manner of Delivery: Notice of a shareholder's meeting shall be given either personally, by mail, or by other means of written communication which is addressed to the shareholder at the shareholder's address appearing on the books of the Corporation or given by that shareholder to the Corporation for the purpose of notice; or, if no such address appears, that notice is given either at the place where the principal executive office of the Corporation is located or by publication at least once in a newspaper of general circulation in the county in which the principal executive office is located. Notice by mail shall be deemed to have been given at the time a written notice is deposited in the United States mail, postage prepaid.

2.05 Quorum: A majority of the shares entitled to vote, represented in person or by proxy, shall constitute a quorum at any meeting of shareholders. The shareholders present at a duly called or held meeting at which a quorum is present may continue to do business until adjournment, notwithstanding the withdrawal of enough shareholders to leave less than a quorum, if any action taken (other than adjournment) is approved by at least a majority of the shares required to constitute a quorum.

2.06 Adjourned Meetings: Any shareholders' meeting, whether or not a quorum is present, may be adjourned from time to time by the vote of a majority of the shares. In the absence of a quorum, except as provided in Section 2.05, no other business may be transacted at such meeting.

A. Notice: It shall not be necessary to give notice of the time and place of the adjourned meeting or of the business to be transacted thereat, other than by announcement at the meeting at which such adjournment is taken. However, when any shareholders' meeting is adjourned for more than 45 days, or if after adjournment a new record date is fixed for the adjourned meeting, then notice of the adjourned meeting shall be given as in the case of an original meeting.

2.07 Voting: Only those shareholders in whose names shares stand in the stock records of the Corporation on the record date determined in accordance with

Section 2.08 shall be entitled to notice of any meeting or to vote at any such meeting. A majority favorable vote shall be necessary to pass any matter. Voting shall in all cases be subject to the provisions of this Section 2.07 and to Chapter 7 of the California General Corporation Law.

A. Shares Held By Fiduciaries: Subject to 2.07, shares held by an administrator, executor, guardian, conservator or custodian may be voted by such holder either in person or by proxy, but no trustee shall be entitled to vote shares held by such trustee without a transfer of such shares into the trustee's name.

B. Multiple Shareholders: If shares stand of record in the names of two or more persons, whether fiduciaries, members of a partnership, joint tenants, tenants in common, husband and wife as community property, tenants by the entirety, voting trustees, persons entitled to vote under a shareholder voting agreement or otherwise, or if two or more persons (including proxyholders) have the same fiduciary relationship respecting the same shares, unless the secretary of the Corporation is given written notice to the contrary and is furnished with a copy of the instrument or order appointing them or creating the relationship wherein it is so provided, their acts with respect to voting shall have the following effect:

1. If only one votes, such act binds all;
2. If more than one vote, the act of the majority so voting binds all;
3. If more than one vote, but the vote is evenly split on any particular matter, each faction may vote the securities in question proportionately.

If the instrument so filed or the registration of the shares shows that any such tenancy is held in unequal interests, a majority or even split for the purpose of this section shall be a majority or even split in interest.

C. Cumulative Voting: Subject to the following sentence and to the provisions of Section 708 of the California General Corporation Law, every shareholder entitled to vote at any election of directors may cumulate votes and give one candidate a number of votes equal to the number of directors to be elected multiplied by the number of votes to which the shareholder's shares are entitled, or

distribute the shareholder's votes on the same principle among as many candidates as the shareholder thinks fit. Shareholders shall have the cumulative voting right only if they give notice of the exercise of such right to other shareholders.

D. Necessity of Ballots: Elections need not be by ballot except as indicated in 2.07 E, below.

E. Election of Directors: Notwithstanding the provisions of Section 2.07 D, election for directors must be by ballot upon demand by a shareholder at the meeting and before the voting begins. In any election of directors, the candidates receiving the highest number of votes of the shares entitled to be voted for them up to the number of directors to be elected by such shares are elected.

2.08 Record Date: The Board may fix, in advance, a record date for the determination of the shareholders entitled to notice of any meeting or to vote or entitled to receive payment of any dividend or other distribution, or any allotment of rights, or to exercise rights in respect of any other lawful action. The record date so fixed shall be not more than sixty (60) nor less than ten (10) days prior to the date of the meeting nor more than sixty (60) days prior to any other action. When a record date is so fixed, only shareholders of record on that date are entitled to notice of and to vote at the meeting or to receive the dividend, distribution, or allotment of rights, or to exercise of the rights, as the case may be, notwithstanding any transfer of shares on the books of the corporation after the record date. A determination of shareholders of record entitled to notice of and to vote at a meeting of shareholders shall apply to any adjournment of the meeting unless the Board fixes a new record date for the adjourned meeting. The Board shall fix a new record date if the meeting is adjourned for more than forty-five (45) days.

A. No Record Date Fixed: If no record date is fixed by the Board, the record date for determining shareholders entitled to notice of or to vote at a meeting of shareholders shall be at the close of business on the business day next preceding the day on which notice is given or, if notice is waived, at the close of business on the business day next preceding the day on which the meeting is held. The record date for determining shareholders for any purpose other than that set forth in this Section

or in Section 2.10 shall be at the close of business on the day on which the Board adopts the resolution relating thereto, or the sixtieth (60th) day prior to the date of such other action, whichever is later.

2.09 Meetings Without Notice: The transactions of any meeting of shareholders, however called and noticed, and wherever held, are as valid as though had at a meeting duly held after regular call and notice, if a quorum is present either in person or by proxy, and if, either before or after the meeting, each of the persons who are entitled to vote and who are not present in person or by proxy signs a written waiver of notice, a consent to the holding of the meeting, or an approval of the minutes thereof. All such waivers, consents, or approvals shall be filed with the corporate records or made a part of the minutes of the meeting. Neither the business to be transacted at nor the purpose of any regular or special meeting of shareholders need be specified in any written waiver of notice, except as provided in Section 601(f) of the California General Corporation Law.

2.10 Action Without Meeting: Subject to Section 603 of the California General Corporation Law, any action which, under any provisions of the California General Corporation Law, may be taken without a meeting and without prior notice if a consent in writing, setting forth the action so taken, shall be signed by the holders of outstanding shares having not less than the minimum number of votes that would be necessary to authorize or take such action at a meeting at which all shares entitled to vote thereon were present and voted. Unless a record date for voting purposes be fixed as provided in Section 2.08, the record date for determining shareholders entitled to give consent pursuant to this Section 2.10, when no prior action by the Board has been taken, shall be the day on which the first written consent is given.

2.11 Proxies: Every person entitled to vote shares has the right to do so either in person or by one or more persons authorized by a written proxy executed by such shareholder and filed with the Secretary. Any proxy duly executed is not revoked and continues in full force and effect until revoked by the person executing it prior to the vote by a writing delivered to the Corporation stating that the proxy is revoked or by a subsequent proxy executed by, or by attendance at the meeting and

voting in person by, the person executing the proxy; no proxy shall be valid after the expiration of eleven (11) months from the date of its execution unless otherwise provided in the proxy.

ARTICLE III. DIRECTORS

3.01 Directors Defined: "Directors" and "Board" when used in relation to any power or duty requiring collective action, means "Board of Directors."

3.02 Management of Corporation: Subject to limitations of the Corporation's Articles, these By-Laws, and the California General Corporation Law relating to actions required to be approved by the shareholders or by the outstanding shares, the business and affairs of the Corporation shall be managed and all corporate powers shall be exercised by or under the direction of the Directors. The Directors may delegate the management of the day-to-day operation of the business of the Corporation to a management company or other person provided that the Business and affairs of the Corporation shall be managed and all corporate powers shall be exercised under the ultimate direction of the Directors. The Directors shall act only as a board and all actions of the Board shall be determined by a favorable vote of a majority of the Directors.

An individual Director shall have no power as such. In addition to these general powers, but subject to the same limitations the Directors shall have the following powers:

A. Officers, Agents and Employees: To select and remove officers, agents, and employees of the Corporation, prescribe the powers and duties for them as may not be inconsistent with law, or with the Articles or these By- Laws, fix their compensation, and require from them security for faithful service.

B. Corporate Operations: To conduct, manage, and control the affairs and business of the Corporation and to make such rules and regulations therefor not inconsistent with law, or with the Corporation's Articles or these By- Laws, as they may deem to be in the best interest of the Corporation.

C. Corporate Seal and Stock Certificates: To adopt, make, and use a corporate seal, and to prescribe the forms of certificates of stock, and to alter the form of such seal and of such certificates from time to time as in their judgment they may deem appropriate.

D. Corporate Stock: To authorize the issuance of shares of stock of the Corporation from time to time, upon such terms and for such consideration as may be lawful.

E. Debt: To borrow money and incur indebtedness for the purposes of the Corporation, and to cause to be executed and delivered therefor, in the corporate name, promissory notes, bonds, debentures, deeds of trust, mortgages, pledges, hypothecations, or other evidences of debt and securities therefor.

3.03 Number of Directors: The number of Directors of this Corporation shall be between one (1) and five (5). The authorized number of Directors may be changed by amendment of the Articles, or by a By-Law duly adopted by the shareholders.

3.04 Election, Removal, and Term of Office: The directors shall be elected at each annual meeting of shareholders, but if any such annual meeting is not held or the directors are not elected thereat, the directors may be elected at any special meeting of shareholders held for that purpose. Each director shall hold office until the expiration of the term for which he was elected and until a successor has been elected and qualified, or until his death, resignation or removal. Directors may be removed by the shareholders for any reason at any time.

3.05 Vacancies: Any director may resign effective upon giving written notice to the Directors, the President, or the Secretary, or the Board, unless the notice specifies a later time for the effectiveness of such resignation. If the resignation is effective at a future time, a successor may be elected to take office when the resignation becomes effective. The Board may declare vacant the office of a director who has been declared of unsound mind by an order of court or convicted of a felony.

A. Existence of Vacancy: A vacancy or vacancies in the Board shall be deemed to exist in case of the death, resignation, or removal of any director, or if the authorized number of directors be increased, or if the shareholders fail, at any

annual or special meeting of shareholders at which any director or directors are elected, to elect the full authorized number of directors to be voted for at that meeting.

B. Filling Vacancies:

1. By Directors: Vacancies in the Board, including those existing as a result of a removal of a director, may be filled by a majority of the remaining directors, though less than a quorum, or by a sole remaining director, and each director so elected shall hold office until the next annual meeting and until such director's successor has been elected and qualified.

2. By Shareholders: The shareholders may elect a director or directors at any time to fill any vacancy or vacancies not filled by the directors. Any such election by written consent requires the consent of a majority of the outstanding shares entitled to vote. If the Board accepts the resignation of a director tendered to take effect at a future time, the Board or the shareholders shall have power to elect a successor to take office when the resignation is to become effective.

3. Reduction of Authorized Number of Directors: No reduction of the authorized number of directors shall have the effect of removing any director prior to the expiration of the director's term of office.

3.06 Place of Meeting: Regular or special meetings of the Board shall be held at any place within or without the State of California which has been designated from time to time by the Board. In the absence of such designation, regular meetings shall be held at the principal executive office of the corporation.

3.07 Regular Meetings: Immediately following each annual meeting of shareholders the Board shall hold a regular meeting for the purpose of organization, election of officers, and the transaction of other business.

3.08 Special Meetings: Special meetings of the Board for any purpose or purposes may be called at any time by any member of the Board, the President, or the Secretary. Special meetings of the Board shall be held upon four (4) days written notice or 48 hours notice given personally or by telephone, telegraph, telex, or other similar means of communication. Any such notice shall be addressed or delivered to

each director at such director's address as it is shown upon the records of the corporation or as may have been given to the corporation by the director for purposes of notice, or, if such address is not shown on such records or is not readily ascertainable, at the place in which the meetings of the directors are regularly held.

A. Time of Giving Notice: Notice by mail shall be deemed to have been given at the time a written notice is deposited in the United States mails, postage prepaid. Any other written notice shall be deemed to have been given at the time it is personally delivered to the recipient. Oral notice shall be deemed to have been given at the time it is communicated, in person or by telephone, to the recipient or to a person at the office or place of business of the recipient who the person giving the notice has reason to believe will promptly communicate it to the recipient.

3.09 Quorum: A majority of the authorized number of directors constitutes a quorum of the Board for the transaction of business, except to adjourn as hereinafter provided. Every act or decision done or made by a majority of the directors present at a meeting duly held at which a quorum is present shall be regarded as the act of the Board. A meeting at which a quorum is initially present may continue to transact business, notwithstanding the withdrawal of directors, if any action taken is approved by at least a majority of the required quorum for such meeting.

3.10 Conference Telephone Meetings: Members of the Board may participate in a meeting through use of conference telephone or similar communications equipment, so long as all members participating in such meeting can hear one another.

3.11 Consent of Absentee Directors To Meeting: The transactions of any meeting of the Board, however called and noticed or wherever held, are as valid as though had at a meeting duly held after regular call and notice if a quorum is present and if, either before or after the meeting, each of the directors not present signs a written waiver of notice, a consent to holding such meeting, or an approval of the minutes thereof. All such waivers, consents, or approvals shall be filed with the corporate records or made a part of the minutes of the meeting.

3.12 Adjournment: A majority of the directors present, whether or not a quorum is present, may adjourn any directors' meeting to another time and place. Notice of the time and place of holding an adjourned meeting need not be given to absent directors if the time and place be fixed at the meeting adjourned. If the meeting is adjourned for more than twenty-four (24) hours, notice of any adjournment to another time or place shall be given prior to the time of the adjourned meeting to the directors who were not present at the time of the adjournment.

3.13 Compensation: Directors and members of committees may receive such compensation, if any, for their services, and such reimbursement for expenses, as may be fixed or determined by the Board.

3.14 Action Without Meeting: Any action required or permitted to be taken by the Board may be taken without a meeting pursuant to Section 307(b) of the California General Corporation Law, if all members of the Board shall individually or collectively consent in writing to such action. Such consent or consents shall have the same effect as a unanimous vote of the Board and shall be filed with the minutes of the proceedings of the Board.

3.15 Rights of Inspection: Every director shall have the absolute right at any reasonable time to inspect and copy all books, records, and documents of every kind and to inspect the physical properties of the corporation and also of its subsidiary corporations, domestic or foreign. Such inspection by a director may be made in person or by agent or attorney and includes the right to copy and obtain extracts.

3.16 Committees: The Board may appoint one or more committees, each consisting of one (1) or more directors, and delegate to such committees any of the authority of the Board except with respect to the following:

A. Shareholders' Authority: The approval of any action for which the General Corporation Law also requires shareholders' approval;

B. Board Vacancies: The filling of vacancies on the Board or on any committee;

C. Directors' Compensation: The fixing of compensation of the directors for serving on the Board or on any committee;

D. By-Laws Changes: The amendment or repeal of By-Laws or the adoption of new By-Laws;

E. Board Resolutions: The amendment or repeal of any resolution of the Board which by its express terms is not so amendable or repealable;

F. Shareholder Distribution: A distribution to the shareholders of the corporation except at a rate or in a periodic amount or within a price range determined by the Board;

G. Committees: The appointment of other committees of the Board or the members thereof. Any such committee must be appointed by resolution adopted by a majority of the authorized number of directors and may be designated an Executive Committee or by such other name as the Board shall specify. The Board shall have the power to direct the manner in which proceedings of any such committee shall be conducted. In the absence of any such direction, such committee shall have the power to prescribe the manner in which its proceedings shall be conducted. Unless the Board or such committee shall otherwise provide, the regular and special meetings and other actions of any such committee shall be governed by the provisions of this Article applicable to meetings and actions of the Board. Minutes shall be kept of each meeting of each committee.

ARTICLE IV. OFFICERS

4.01 Officers: The officers of the corporation shall be a president, a secretary, and a treasurer. The corporation may also have, at the discretion of the Board, a chairman of the board, one or more vice-presidents, one or more assistant secretaries, one or more assistant treasurers, and such other officers as may be elected or appointed in accordance with the provisions of Section 4.03.

4.02 Election: The officers of the corporation, except such officers as may be elected or appointed in accordance with the provisions of Section 4.03 or 4.06, shall be chosen annually by, and shall serve at the pleasure of, the Board, and shall hold their respective offices until their resignation, removal, or other disqualification from service, or until their respective successors shall be elected.

4.03 Subordinate Officers: The Board may elect, and may empower the President to appoint, such other officers as the business of the corporation may require. Each of such officers shall hold office for such term, have such authority, and perform such duties as are provided in these By-Laws or as the Board may from time to time determine.

4.04 Removal: Any officer may be removed, either with or without cause, by the Board of Directors at any time, or, except in the case of an officer chosen by the Board, by any officer upon whom such power of removal may be conferred by the Board. Any such removal shall be without prejudice to the rights, if any, of the officer under any contract of employment.

4.05 Resignation: Any officer may resign at any time by giving written notice to the corporation, but without prejudice to the rights, if any, of the corporation under any contract to which the officer is a party. Any such resignations shall take effect at the date of the receipt of such notice or at any later time specified therein; and, unless otherwise specified therein, the acceptance of such resignation shall not be necessary to make it effective.

4.06 Vacancies: A vacancy in any office because of death, resignation, removal, disqualification, or any other cause shall be filled in the manner prescribed in these By-Laws for regular election or appointment to such office.

4.07 Chairman of the Board: The Chairman of the Board, if there shall be such an officer, shall, if present, preside at all meetings of the Board and exercise and perform such other powers and duties as may be from time to time assigned by the Board.

4.08 President: Subject to such powers, if any, as may be given by the Board to the Chairman of the Board, if there be such an officer, the President is the general manager and chief executive officer of the corporation and has, subject to the control of the Board, general supervision, direction, and control of the business and officers of the corporation. The President shall preside at all meetings of the shareholders and, in the absence of the Chairman of the Board, or if there be none, at all meetings of the Board. The President has the general powers and duties of management usually

vested in the office of president and general manager of a corporation and such other powers and duties as may be prescribed by the Board.

4.09 Vice-Presidents: In the absence or disability of the President, the Vice-Presidents, if any, in order of their rank as fixed by the Board or, if not ranked, the Vice-President designated by the Board, shall perform all the duties of the President, and when so acting shall have all the powers of, and be subject to all the restrictions upon, the President. The Vice-Presidents shall have such other powers and perform such other duties as from time to time may be prescribed for them respectively by the Board.

4.10 Secretary: The Secretary shall keep or cause to be kept, at the principal executive office and such other place as the Board may order, a book of minutes of all meetings of shareholders, the Board, and the Board's committees, with the time and place of holding such meeting, whether regular or special, and, if special, how authorized, the notice thereof given, the names of those present at Board and committee meetings, the number of shares present or represented at shareholders' meetings, and the proceedings thereof. The Secretary shall keep, or cause to be kept, a copy of the By-Laws of the Corporation at the principal executive office or business office in accordance with Section 213 of the California General Corporation Law. The Secretary shall keep, or cause to be kept, at the principal executive office, a share register, or a duplicate share register, showing the names of the shareholders and their addresses, the number and classes of shares held by each, the number and date of certificates issued for the same, and the number and date of cancellation of every certificate surrendered for cancellation.

The Secretary shall give, or cause to be given, notice of all the meetings of the shareholders and of the Board and of any committees thereof required by these By-Laws, shall keep the seal of the corporation in safe custody, and shall have such other powers and perform such other duties as may be prescribed by the Board.

4.11 Treasurer: The Treasurer is the chief financial officer of the corporation and from time to time may be called "the chief financial officer," and shall keep and maintain, or cause to be kept and maintained, adequate and correct accounts of the

properties and business transactions of the corporation, and shall send or cause to be sent to the shareholders of the corporation such financial statements and reports as are by law or these By-Laws required to be sent to them. The books of account shall at all times be open to inspection by any director.

The Treasurer shall deposit all monies and other valuables in the name and to the credit of the corporation with such depositories as may be designated by the Board. The Treasurer shall disburse the funds of the corporation as may be ordered by the Board, shall render to the President and directors, whenever they request it, an account of all transactions as Treasurer and of the financial condition of the corporation, and shall have such other powers and perform such other duties as may be prescribed by the Board.

ARTICLE V. EXECUTION OF INSTRUMENTS

5.01 Corporate Officers: Subject to the provisions of applicable law, any note, mortgage, evidence of indebtedness, contract, share certificate, conveyance, or other instrument in writing and any assignment or endorsements thereof executed or entered into between this corporation and any other person, when authorized by the Board of Directors and signed by the Chairman of the Board, if any, the President or any Vice-President, and the Secretary, any Assistant Secretary, the Treasurer or any Assistant Treasurer of this corporation, shall be valid and binding on this corporation in the absence of actual knowledge on the part of the other person that the signing officers had no authority to execute the same.

5.02 Designated Signatories: Any such instrument may be signed by any other person or persons and in such manner as from time to time shall be determined by the Board and, unless so authorized by the Board, no officer, agent, or employee shall have any power or authority to bind the corporation by any contract or engagement or to pledge its credit or to render it liable for any purpose or amount.

ARTICLE VI. RIGHTS OF INSPECTION OF CORPORATE RECORDS

6.01 Record of Shareholders: The record of shareholders shall be open to inspection and copying by any shareholder or holder of a voting trust certificate at any time during usual business hours upon written demand on the corporation for a purpose reasonably related to such holder's interest as a shareholder or holder of a voting trust certificate.

6.02 Accounting Records and Minutes: The accounting books and records and minutes of proceedings of the shareholders and the Board and committees of the Board shall be open to inspection upon written demand on the corporation of any shareholder or holder of a voting trust certificate at any reasonable time during usual business hours, for a purpose reasonably related to such holder's interests as a shareholder or as a holder of such voting trust certificate.

6.03 Authorized Persons: Any inspection and copying under this Article may be made in person or by agent or attorney.

ARTICLE VII. INDEMNIFICATION

7.01 Definitions: For the purposes of this Article, "agent" includes any person who is or was a director, officer, employee, or other agent of the corporation, or is or was serving at the request of the corporation as a director, officer, employee, or agent of another foreign or domestic corporation, partnership, joint venture, or agent of a foreign or domestic corporation which was a predecessor corporation of the corporation or of another enterprise at the request of such predecessor corporation; "proceeding" includes any threatened, pending, or completed action or proceeding, whether civil, criminal, administrative or investigative; and "expenses" includes attorneys' fees and any expenses of establishing a right to indemnification hereunder.

7.02 Indemnification in Actions By Third Parties: The corporation shall have power to indemnify any person who was or is a party or is threatened to be made a party to any proceeding (other than an action by or in the right of the corporation) by reason of the fact that such person is or was an agent of the corporation, against expenses, judgments, fines, settlements, and other amounts actually and reasonably

incurred in connection with such proceeding if such person acted in good faith and in a manner such person reasonably believed to be in the best interests of the corporation and, in the case of a criminal proceeding, had no reasonable cause to believe the conduct of such person was unlawful. The termination of any proceeding by judgment, order, settlement, conviction, or upon a plea of *nolo contendere* or its equivalent shall not, of itself, create a presumption that the person did not act in good faith and in a manner which the person reasonably believed to be in the best interests of the corporation or that the person had reasonable cause to believe that the person's conduct was unlawful.

7.03 Indemnification in Actions by or in the Right of the Corporation: The corporation shall have power to indemnify any person who was or is a party or is threatened to be made a party to any threatened, pending, or completed action by or in the right of the corporation to procure a judgment in its favor by reason of the fact that such person is or was an agent of the corporation, against expenses actually and reasonably incurred by such person in connection with the defense or settlement of such action if such person acted in good faith, in a manner such person believed to be in the best interests of the corporation, and with such care, including reasonable inquiry, as an ordinarily prudent person in a like position would use under similar circumstances. No indemnification shall be made hereunder in connection with the following:

A. Liability to Corporation: In respect of any claim, issue, or matter as to which such person shall have been adjudged to be liable to the corporation in the performance of such person's duty to the corporation, unless and only to the extent that the court in which such action was brought shall determine upon application that, in view of all the circumstances of the case, such person is fairly and reasonably entitled to indemnity for the expenses which such court shall determine;

B. Settlement of Litigation: Of amounts paid in settling or otherwise disposing of a threatened or pending action, with or without court approval; or

C. Defense of Litigation: Of expenses incurred in defending a threatened or pending action which is settled or otherwise disposed of without court approval.

7.04 Indemnification Against Expenses: To the extent that an agent of the corporation has been successful on the merits in defense of any proceeding referred to in 7.02 or 7.03 or in defense of any claim, issue or matter therein, the agent shall be indemnified against expenses actually and reasonably incurred by the agent in connection therewith.

7.05 Required Determinations: Except as provided in 7.04, any indemnification under this Article shall be made by the corporation only if authorized in the specific case, upon a determination that indemnification of the agent is proper in the circumstances because the agent has met the applicable standard of conduct set forth in 7.02 and 7.03.

A. Directors: A majority vote of a quorum consisting of directors who are not parties to such proceeding; or

B. Shareholders: Approval of the shareholders, with the shares owned by the person to be indemnified not being entitled to vote therein; or

C. Court: The court in which such proceeding is or was pending upon application made by the corporation or the agent or the attorney or other person rendering services in connection with the defense, whether or not such application by the agent, attorney, or other person is opposed by the corporation.

7.06 Advance of Expenses: Expenses incurred defending in any proceeding may be advanced by the corporation prior to the final disposition of such proceeding upon receipt of an undertaking by or on behalf of the agent to repay such amount unless it shall be determined ultimately that the agent is entitled to be indemnified as authorized in this Article.

7.07 Other Indemnification: No provision made by the corporation to indemnify its directors or officers for the defense of any proceeding, whether contained in the Articles, By-Laws, a resolution of shareholders or directors, an agreement, or otherwise, shall be valid unless consistent with this Article. Nothing

contained in this Article shall affect any right to indemnification to which persons other than such directors and officers may be entitled by contract or otherwise.

7.08 Forms of Indemnification Not Permitted: No indemnification or advance shall be made under this Article, except as provided in 7.04 or 7.05, in any circumstance where the following appear:

A. Corporation Rules: That it would be inconsistent with a provision of the Articles, By-Laws, a resolution of the shareholders, or an agreement in effect at the time of the accrual of the alleged cause of action asserted in the proceeding in which the expenses were incurred or other amounts were paid, which prohibits or otherwise limits indemnification; or

B. Court Holding: That it would be inconsistent with any condition expressly imposed by a court in approving a settlement.

7.09 Insurance: The corporation shall have power to purchase and maintain insurance on behalf of any agent of the corporation against any liability asserted against or incurred by the agent in such capacity or arising out of the agent's status as such whether or not the corporation would have the power to indemnify the agent against such liability under the provisions of this Article.

7.10 Employee Benefit Plans: This Article does not apply to any proceeding against any trustee, investment manager, or other fiduciary of an employee benefit plan in such person's capacity as such, even though such person may also be an agent of the corporation as defined in 7.01. Nothing contained in this Article shall limit any right to indemnification to which such persons may be entitled by contract or otherwise which shall be enforceable to the extent permitted by applicable law other than Section 317 of the California General Corporation Law.

ARTICLE VIII. ISSUANCE AND TRANSFER OF SHARES

8.01 Right to Certificate: Every holder of shares in the corporation shall be entitled to a certificate certifying the number of shares and the class or series of shares owned by him. This right extends to fractional shares and partly paid shares if such shares are issued by the corporation.

A. Payment for Stock: Certificates for shares may be issued prior to full payment under such restrictions and for such purposes as the Board may provide. However, on any certificate issued to represent any partly paid shares, the total amount of the consideration to be paid therefor and the amount paid thereon shall be stated.

8.02 Share Certificates: The certificates shall be in such form and device as shall be provided by the Board of Directors and shall fully comply with the provisions of the Corporations Code of the State of California. The certificates shall be signed by the Chairman of the Board, if any, or the President or a Vice-President and by the Treasurer or an Assistant Treasurer or the Secretary or any Assistant Secretary of the corporation, and the seal of the corporation shall be affixed thereto.

8.03 Exchange of Certificates: If the Articles of Incorporation are amended in any way affecting the statements contained in the certificates for outstanding shares, or it becomes desirable for any reason, in the discretion of the Board of Directors, to cancel any outstanding certificates for shares and issue a new certificate therefor conforming to the rights of the holder, the Board may order any holders of outstanding certificates to surrender and exchange them for new certificates within a reasonable time to be fixed by the Board.

8.04 Replacement of Certificates: No new certificates shall be issued until the former certificate for the shares represented thereby shall have been surrendered and canceled, except in the case of a lost, stolen, or destroyed certificate. In this latter case the corporation must, if so requested by the shareholder, issue a new certificate, provided it has received no notice that the certificate has been acquired by a bona fide purchaser, but it may require the giving of a bond or other adequate security sufficient to indemnify it against any claim that may be made against it on account of the alleged loss, theft, or destruction of the certificate or the issuance of the new certificate.

8.05 Transfer of Shares: Shares of the corporation may be transferred by endorsement by the signature of the owner, his authorized agent, attorney, or legal representative, and the delivery of the certificate; but such transfer is not valid,

except as to the parties by whom and to whom transferred, the number of the certificate, and the number or designation of the shares and the date of the transfer, and until the old certificate is surrendered to the corporation and canceled.

8.06 Registration of Transfer: The corporation is under a duty to register the transfer when the certificate, properly endorsed, is presented to it with a request to register the transfer and reasonable assurance is given that the endorsements are genuine and effective and the corporation has no duty to inquire into adverse claims or it has discharged any such duty, and any applicable law relating to the collection of taxes has been complied with.

8.07 Liability for Partly Paid Shares: The transferor and transferee of partly paid shares, if any are issued, shall be liable to the corporation for the unpaid balance of such shares as provided by law.

ARTICLE IX. ANNUAL REPORT TO SHAREHOLDERS

9.01 Annual Report to Shareholders: The annual report to shareholders referred to in Section 1501 of the California General Corporation Law is expressly waived, but nothing herein shall be interpreted as prohibiting the Board from issuing annual or other periodic reports to shareholders.

ARTICLE X. CONSTRUCTION AND DEFINITIONS

10.01 Construction and Definitions: Unless the context otherwise requires, the general provisions, rules of construction, and definitions contained in the General Provisions of the California Corporations Code and in the California General Corporation Law shall govern the construction of these By-Laws.

ARTICLE XI. AMENDMENT OF BY-LAWS

11.01 Amendment of By-Laws by Shareholders and Directors: The By-Laws, and every part thereof, may from time to time and at any time, be amended, altered, repealed, and new or additional By-Laws may be adopted as follows:

A. Shareholders: By the vote of a majority of the shareholders entitled to exercise the voting power of the corporation or by the written assent of such shareholders; or

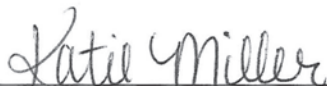
B. Directors: Subject to such right of shareholders, by a majority of the Directors present at any meeting of the Board at which a quorum is present. However, the Directors may not adopt a By-Law or amendment thereof changing the authorized number of Directors.

CERTIFICATE OF SECRETARY

I, the undersigned, hereby certify:

1. That I am the duly elected and acting Secretary of the above-named corporation;
2. That the foregoing By-Laws, consisting of twenty-two (22) pages, were duly adopted by the corporation; and
3. That these By-Laws are the currently effective By-Laws of the corporation.

IN WITNESS WHEREOF, I have subscribed my name and affixed the seal of the corporation hereto on this 2nd day of January, 2013, at Bakersfield, California.


KATRINA M. MILLER, Secretary

1. Business names:

Legal Name: Cathy's Creations, Inc.
D/B/A: Tastries
D/B/A: Creative Touch

2. Business address: 3665 Rosedale Hwy., Bakersfield CA 93308

3. Business structure: S-Corp

4. State of CA contracts: None

Supplemental Questions

1. Statement of position regarding allegations in the complaint:

Overview of Cathy's Sincerely Held Religious Beliefs

Cathy Miller is a creative designer who owns and operates Cathy's Creations, Inc., doing business as "Tastries," a small bakery in Bakersfield, California.¹ Cathy has used her creative talents in many ways over the years: through music, elementary education, floral arrangements, interior design, and event planning. She has always had a unique ability to provide inspiring and creative vision to every project and service. With Tastries, she directs a team of culinary artists who, by creating a vast selection of artistic bakery designs, help enrich her clients' life celebrations.

Cathy is a practicing Christian and woman of deep faith; she seeks to honor God in all aspects of her life. This includes how she treats people and how she runs her business. She believes God has called her to abide by His precepts that He set forth in the Bible. In other words, she strives to honor God by making her life edifying to Him. As a Christian, Cathy desires her life to be one of grace, love, compassion, and truth. Among the fundamental principals of her faith is the belief that God designed marriage to be between a man and a woman.

Accordingly, this belief guides Tastries' marriage-related products and services. Cathy understands that others may hold views that are different from hers (including customers and employees), but she does not require anyone to share this view as a condition for service or employment.

¹ For simplicity, "Cathy" will refer to both Catharine Miller and Tastries throughout this response as the context permits.

Cathy's faith also teaches her to welcome and serve everyone. And she does. She welcomes people from all lifestyles, including individuals of all races, creeds, gender identities, and sexual orientations. In other words, she offers her artistic vision to create specially designed custom cakes and desserts for anyone. Cathy eagerly seeks to serve all people, but she cannot design custom cakes that express ideas or celebrate events that conflict with her core religious beliefs. Specifically, her decisions on whether to design a specific custom cake never focus on *who* the client is. Rather, they focus on *what* the custom cake will express or celebrate. These limitations on Cathy's custom work have no bearing on her premade items, which were not made for any specific purpose or message and are available to all customers for any use they may choose.

There are many custom cakes that Cathy will not create. For example, she will not design cakes that contain explicit sexual content, satanic symbols, or demonic images. Nor will she design cakes that demean people for any reason—including their sexual orientation—or promote violence, drunkenness, drug abuse, racism, or any other message that conflict with her fundamental Christian principles.

This policy applies across the board, and Cathy's custom wedding cakes are no exception. They are her artistic expression because, through them, she and her business communicate a message of profound importance to her. For example, Cathy's custom wedding cakes announce a basic message: this event is a wedding, and the couple's union is a marriage. They also declare an opinion: the couple's wedding and marriage should be celebrated. These expressions have a lasting value through pictures presenting the wedding cake as a centerpiece of the celebration. Therefore, whenever Cathy creates a custom wedding cake, she is expressing a message about marriage.

Like many Christians, Cathy believes that marriage is a sacred union between one man and one woman. She also believes, in accordance with the Bible's teachings, that marriage represents the relationship between Jesus Christ and His Church. Weddings signify that the "two [have] become one flesh" and that no one should separate "what God has joined together."²

Regardless of whether Cathy's wedding clients plan an overtly religious event, she believes that all weddings are sacred and that they create an inherently religious relationship. Thus, Cathy would consider it sacrilegious to express through her designs an idea about marriage that conflicts with her beliefs. For this reason, she cannot provide custom wedding products and services that celebrate any form of marriage other than that between a husband and wife.

² *Mark 10:8-9.*

Cathy's First Amendment Rights

The United States Constitution protects Cathy's right to control the content of her artistic expression.³ This right applies both to individuals and "business corporations generally."⁴ Thus, a cake artist who serves all people, as Cathy does, cannot be forced to create objectionable artistic expression.

The First Amendment also protects Cathy's right to freely exercise her religion. The scope of protected religious exercise extends beyond "belief and profession."⁵ Indeed, it extends to "the performance of (or abstention from) physical acts that are engaged in for religious reasons" and even to "[b]usiness practices" that are "compelled or limited by the tenets of a religious doctrine."⁶ Cathy cannot create custom cakes that celebrate or promote the idea that marriage can be the union of anyone other than one man and one woman. Communicating that message would violate her religious beliefs. And forcing Cathy to do so would violate her free exercise rights.

These are bedrock constitutional principles. Cathy did not think that the government could force her to choose between creating objectionable artistic expression and giving up her business.

Summary of the Incident

Cathy welcomed Eileen and Mireya to her cake shop on August 26, 2017, just like she would any other prospective client. They came into the shop with an older woman and joined a couple of men who were already there. This was not unusual; Cathy often meets with couples along with members of the wedding party. She believed these five were the bride and groom along with the maid of honor, the best man, and a mother. But it was unusual that no one began filling out the custom cake request form or wished to sample the cupcakes that had been prepared for tasting.

So, Cathy asked for some details. Mireya told Cathy that she wanted a custom three-tiered wedding cake with decorative ribbon and two sheet cakes with matching finish. Cathy then asked Mireya to fill out the custom cake request form. Mireya said that Eileen would do it. As Cathy handed the clipboard with the form to Eileen, she asked, "Which one of you is the groom?" One of the men pointed to Eileen and said, "She is."

³ See *Turner Broad Sys., Inc. v. FCC*, 522 U.S. 622, 641 (1994) (plurality opinion) (explaining that individuals and businesses have the right to determine for themselves "the ideas and beliefs deserving of expression, consideration, and adherence"); *Hurley v. Irish-Am. Gay, Lesbian & Bisexual Grp. of Bos.*, 515 U.S. 557, 576 (1995) (discussing principles of expressive autonomy); *Wooley v. Maynard*, 430 U.S. 705, 715 (1977) ("The First Amendment protects the right of individuals to hold a point of view different from the majority and to refuse to foster ... an idea they find morally objectionable.").

⁴ *Hurley*, 515 U.S. at 574.

⁵ *Burwell v. Hobby Lobby Stores, Inc.*, 134 S. Ct. 2751, 2770 (2014) (internal quotation marks omitted).

⁶ *Burwell*, 134 S. Ct. at 2770.

Cathy turned to Eileen, who was filling out the custom cake request form. Eileen laughed and said, “I still have trouble remembering to write Rodriguez-Del Rio.” This perplexed Cathy. Ordinarily, people change names after they marry, not before. So, Cathy asked where they were getting married. They said, “At the Metro.” Cathy asked some other general questions like “What time are you getting married?” and “Did you get the early or late set-up time at the Metro?” But Mireya and Eileen had difficulty answering these questions. It appeared that they were thinking about these details for the first time.

Because of this, Cathy questioned the sincerity of this custom cake request. In any event, she knew that she could not create custom cakes to celebrate and promote a same-sex wedding. So, she assumed the best and politely declined the opportunity to create the requested custom cakes. She then referred Mireya and Eileen to another cake artist who could create them. Cathy also invited them to sample the cake flavors. But suddenly, one of the men startled Cathy by reaching over Cathy’s shoulder to grab the order form. Then the group abruptly left the shop. Cathy later learned that the two men had signed up for a cake tasting at a separate time. She also learned that Mireya and Eileen had been married since December 2016, ninth months before.

2. Why did you refuse to make a wedding cake for the complainants:

Cathy’s custom wedding cakes are her expression. She welcomes and serves all people, but she declines to promote all messages. In this instance, Cathy declined the opportunity to create custom wedding cakes that would celebrate and promote ideas about marriage that conflict with her religious beliefs. She also questioned the sincerity of the custom cake request in light of the unusual comments.

3. What are the specific religious bases for your refusal to make or sell wedding cakes for same-sex wedding celebrations:

Cathy declines opportunities to create custom wedding cakes that would celebrate and promote ideas about marriage that conflict with her religious beliefs. This objection concerns her speech, not her willingness to enter into a commercial relationship. Cathy welcomes and serves all people, but she cannot promote all messages

With that in mind, Cathy believes she must always “bear witness to the truth.”⁷ This means she cannot create a custom artistic expression that promotes messages that distort God’s truth.

The Bible teaches Cathy that God instituted marriage to be an exclusive union between one man and one woman, where the two will become one flesh,⁸ for companionship, procreation, the fulfillment of sexual desire,⁹ as a family structure ideal for raising children

⁷ *John* 18:37.

⁸ *Genesis* 2:22-24 and *Mark* 10:6-9.

⁹ *Genesis* 1:28; *Genesis* 2:18; and *1 Corinthians* 7:2.

and social stability,¹⁰ and as a model for God's covenant with His people leading to the ultimate marriage between Christ and the Church.¹¹

The Bible also teaches that homosexuality is wrong because it is a counterfeit of the relationship God designed between man and woman.¹² Cathy believes homosexuality is a sin without exceptions and that God does not create any special conditions where homosexuality is permissible.

To say marriage is something other than the exclusive union of one man and one woman would distort this truth. In effect, compelling Cathy to create custom artistic expressions to promote different conceptions of marriage would not only force her to express a false message about marriage, but to also express a false message about God's relationship to His people. In doing so, she would disobey God by distorting His truth and thus violate her conscience.

Cathy also recognizes that she is a sinner who is imperfect before God. And she believes her sinful condition creates the same need as homosexual sin, that all sin separates us from a relationship with God, and that relationship can only be restored through God's grace and our repentance.

4. Have you made or sold cakes for same-sex wedding celebrations:

Cathy does not knowingly create custom wedding cakes to celebrate or promote any marriage relationship other than marriage between a man and a woman. With that said, Cathy and her business have unknowingly created custom wedding cakes to celebrate same-sex weddings a few times in the past.

One of the same-sex wedding cakes was about three years ago. Cathy did not realize it was for a same-sex wedding until her husband Mike delivered the cake. We do not have any information to identify this cake order or customer.

In the summer of 2016, a gay couple ordered a wedding cake that lead to the verbal agreement with Stephanie at Gimme Some Sugar. Cathy transferred the order to Stephanie. When Cathy talked with the two men about her beliefs, they understood and said they did not mind at all and appreciated Cathy's honesty and for referring them to another great cake artist that they did not know about. Cathy sent the couple's information to Stephanie on September 1, 2016.

The other same-sex wedding Cathy is aware of is the couple that ended up in the news because of this situation. Cathy recalls that they had come in together, but no one realized they were a couple (it is normal for a bride to come with her sister or maid of honor). The week of the wedding, an employee called to ask for the cake topper and they said it would

¹⁰ *Proverbs* 1:8; *Deuteronomy* 5:16; and *Malachi* 4:6.

¹¹ *Isaiah* 62:5; *Ephesians* 5:31-33; and *Revelation* 19:2.

¹² *Leviticus* 18:22 and *Romans* 1:26-27.

be at the venue on the cake table. When an employee delivered the cake, she noticed the topper was two girls. She put the topper on the cake, told the family congratulations and left.

5. Have you refused, on religious grounds, to make or sell cakes for other types of occasions, celebrations or events?

Yes. Although Cathy does not keep records of custom cake requests that she declines, she has declined the opportunity to create custom cakes to celebrate or promote messages that conflict with her religious beliefs for other events, including opposite-sex weddings.¹³

Cathy's custom cake design standards are informed by her religious beliefs.¹⁴

6. Have you made or sold cakes to be used in wedding celebrations between a couple, at least one of whom had been divorced?

Yes. Cathy has created custom wedding cakes for couples in that situation in the past. Faithful Christians may disagree on whether someone may remarry after divorce.¹⁵ The Bible does permit divorce and re-marriage in some circumstances.¹⁶ Cathy does not inquire into specific details in situations like this to understand all circumstances behind a couples decision to marry. While some heterosexual marriages are not appropriate, Cathy cannot always know the facts, but under no circumstances does the Bible permit any marriage that is not between one man and one woman.

7. Have you made or sold cakes to be used in wedding celebrations between a couple, at least one of whom had children out of wedlock?

Yes. Cathy has made custom wedding cakes for couples in that situation. The Bible does not disqualify someone from marriage just because he or she engaged in premarital sex. For this reason, Cathy supports couples who are making their relationship right with God and providing a traditional family environment for raising their children.

¹³ See, e.g., Question 8.

¹⁴ See Exhibit A.

¹⁵ See, e.g., Marriage, Divorce, & Remarriage, *Challies* (Aug. 18, 2017) ("Of course, there is little controversy among orthodox Christians about marriage. We all agree it is an institution designed by God for the benefit of humanity. We agree that it is defined something like this: 'A lifelong covenant of companionship between a man and a woman that has been established under God and before the community.' Where there is much less unanimity is in the area of divorce and remarriage."), <https://www.challies.com/book-reviews/marriage-divorce-and-remarriage/>.

¹⁶ Cf. *Matthew* 5:32.

8. Have you refused to make or sell a wedding cake for an opposite-sex couple based on religious reasons?

Yes. Cathy declines to create custom cakes that contain explicit sexual content. This accords with her policy to only create custom cakes that promote messages consistent with Philippians 4:8.¹⁷ For example, Cathy has declined to create custom wedding cakes for opposite-sex couples that contain explicit sexual content or otherwise promote messages that conflict with her religious beliefs. With all such circumstances, Cathy has been able to present a design option that the couple was willing to consider, and in most cases, they booked with Tastries.

9. Since January 1, 2014, have you refused to make or sell cakes to a potential customer for any reason?

Yes. Cathy has declined to create custom cakes that violate her custom cake policy during that timeframe. But she does not retain information concerning custom cake requests that were declined.

10. For the period of January 1, 2014, to the present, provide a list of all potential customers you have denied service to due to their sexual orientation.

Cathy does not retain information concerning custom cake requests that were declined. With that said, she has never declined to serve someone because of his or her sexual orientation. Cathy welcomes and serves everyone, but she cannot create custom artistic expression to promote every message.

11. Describe all communications between Catharine Miller and Gimme Some Sugar and/or Stephanie Caughell-Fisher regarding referral of potential Tastries customers to Gimme Some Sugar.

In the summer of 2016, Cathy contacted Stephanie at Gimme Some Sugar after a same-sex couple booked a cake with Cathy. She met with Stephanie at her shop and Cathy recalls the following conversation:

"I knew she was an amazing decorator. The only other time I had been in her shop, I had asked her if she was ever interested, I would love to have her work at Tastries. She said, 'My dream is to have a little French Bakery in Europe, but if you ever need help just let me know, and I would be happy to help you on busy weekends or any other time.' We had also seen each other at the Sugar Festival and few other events."

"I told her I had a situation and needed help. I was upset because I could not do a cake for a same-sex couple who had come to the bakery. I told her, 'Stephanie I am not sure what to do, and I don't want to offend you, but at the same time I am hoping

¹⁷ See *Philippians 4:8* ("[W]hatever is true, whatever is noble, whatever is right, whatever is pure, whatever is lovely, whatever is of good report, if anything is virtuous or praiseworthy, think about these things.")

we can work together. I have two men who would like me to do their wedding cake and I just can't do it. I know you are in a relationship with another woman, I know that we both are Christians and we see things differently, but would you be willing to do their cake? I don't want to hurt anyone, but with my Christian beliefs I just can't bake the cake, but I want to help them get what they need.' She came around the counter and hugged me. By then we were both teary-eyed and we talked about our beliefs. She said, 'I totally understand how you feel because you are just like my mother. She loves me but does not understand my relationship.' We talked about our religious convictions and understood each other. Again she said, 'I totally understand, my mother and you think the same way. It is ok.' Then she said, 'Why don't you just send me their contact information and I can give them a call. Here are my business cards, you can just refer your clients to me, I understand.' She went behind the counter, gave me her business cards. I was choked up and very appreciative. I thanked her and told her I would bring their order form and deposit by.

Cathy has since referred three couples to Stephanie. All of them were very understanding of Cathy's sincerely held religious beliefs about marriage, and two of them continue to frequent the bakery.

- 12. Describe any agreement between Catharine Miller and Gimme Some Sugar and/or Stephanie Caughell-Fisher regarding referral of potential Tastries customers to Gimme Some Sugar.**

The arrangement was verbal. There were no specific terms or conditions, but there was an understanding that Gimme Some Sugar would work with any clients that Cathy sent her way.¹⁸

- 13. For each potential Tastries customer referred to Gimme Some Sugar, please list the name and contact information.**

Cathy does not retain information about people she refers to Gimme Some Sugar. But she can only remember referring a few people there since 2016.

- 14. How many wedding cakes has Tastries sold in the last two years?**

Approximately 500.

- 15. How many wedding cakes has Tastries custom designed in the last two years?**

All wedding cakes are custom designed.

¹⁸ See Question #11.

- 16. How many pre-designed or non-custom wedding cakes has Tastries sold in the last two years?**

None. Cathy only creates custom wedding cakes.

- 17. What percentage of the total number of cakes produced by Tastries in the last two years were wedding cakes?**

Wedding cake sales have been about 25% to 30% of all cake sales (based on sales revenue). This does not include other products and services for weddings (such as dessert bars, cake stand rentals, and deliveries). Cathy does not track these additional services for weddings versus other events.

- 18. Do Tastries wedding cakes typically have writing on them? If yes, what is the typical written message?**

All custom wedding cakes are created to celebrate or promote the wedding. At a basic level, Cathy's custom wedding cakes announce that a wedding has occurred. Moreover, they urge that the wedding should be celebrated. These messages are always communicated through Cathy's custom wedding cakes regardless of whether they contain "writing."

With that said, although not all custom wedding cakes have "writing" on them, Cathy commonly creates custom wedding cakes that do. For example, Cathy is often asked to write a Bible verse, the couples' initials, song lyrics, a poem, or some personal message on the wedding cake.

- 19. Describe the design process for creating a Tastries wedding cake?**

Cathy (or one of her team members) visits with every prospective client who seeks a custom-designed wedding cake. During this meeting, Cathy and her client develop specific features of the custom wedding cake; the overall process usually takes between one and two hours. In this meeting, Cathy first learns about the overall theme, color palette, venue, and style for the wedding. Then they turn to the details of the cake.

Sometimes, the client will have a basic idea of the design they might like. They will either bring in a picture from Cathy's website, social media, or somewhere else, or choose a design concept from an in-store fake-cake display as a starting point. This gives Cathy a general idea of what the client might like. Cathy then builds on that vision to design the best custom cake to celebrate the wedding in the style and budget laid out by the client. She discusses all the possible flavors, filling, frosting, colors, trim, finishing techniques, sculpting, writing, flowers (fresh, silk, sugar, fondant), toppers, and other custom details.

Once this design process is complete and the client wishes to commission Cathy for the custom wedding cake, Cathy and her client complete the order form. The order will usually include details of delivery and set-up at the wedding venue.

- 20. Describe Catharine Miller's role in the wedding cake design process? Does her role differ for cakes other than wedding cakes?**

Cathy works with a majority of clients seeking custom wedding cakes. She participates in every part of the design process, but she will allow capable team members to help create custom cakes as long as they have the artistic skill to do so. Cathy's responsibilities do not change based on the kind of custom cake requested.

- 21. What percentage of Tastries cakes did Catharine Miller design in the last two years?**

Cathy cannot determine this percentage. She participates in every part of the custom cake design process. Cathy also has a sales staff and decorators that Cathy has trained in cake design. She will assign capable team members to design tasks as long as they have the artistic skill for the job.

- 22. Describe Catharine Miller's role in baking, sculpting, decorating, frosting, or otherwise assembling (i.e., Catharine Miller's role aside from the design process of the cakes).**

These "roles" cannot be isolated from the "design process." Cathy participates in every part of the custom cake design and creation process. Cathy also has a team of bakers and decorators at different levels of capability. Cathy provides training and sets the process by which cakes are created, including recipes, ingredient selection, baking temperatures and times, tools to be used, decorating techniques, finish styles and specialty tools to be used. Cathy assigns all custom cake orders and determines which staff member is best suited for the particular style of cake to be assigned based on artistic capability and the schedule availability.

- 23. What percentage of Tastries cakes did Catharine Miller bake, sculpt, decorate, frost, or otherwise assemble in the last three years? What is the percentage for wedding cakes?**

Cathy cannot determine this percentage. She participates more directly in the design process and manages a team of bakers and decorators in the creation process. Also, Cathy does perform baking and decorating duties as needed.

- 24. Does Catharine Miller deliver cakes to wedding celebrations personally? If yes, what percentage of wedding cakes does Ms. Miller personally deliver to wedding celebrations? What is the decision-making process that leads to Ms. Miller personally delivering cakes to wedding celebrations?**

Yes, Cathy delivers some custom wedding cakes to wedding celebrations. But her husband, Mike Miller, delivers most of them.

Many factors are considered when making this decision. If Cathy is coordinating the event (in addition to designing the custom wedding cake), her client requests that she deliver the cake, or others are unavailable, Cathy will deliver the cake if possible. But most of the

time, Mike delivers the cake. This allows Cathy to stay at the bakery to accept new commissions, create custom cakes, attend clients, and supervise team members.

- 25. Have Catharine Miller or other Tastries employees or independent contractors participated in wedding celebrations at which Tastries cakes are involved? If yes, please describe such participation.**

Yes, Cathy has coordinated weddings for which she also created the custom wedding cake. She was an event coordinator before purchasing the bakery; indeed, her involvement in event services is what motivated her to purchase the bakery.

Due to her responsibilities with the bakery, Cathy is not coordinating as many events now as she had in the past. Whenever Cathy coordinates a wedding, she invests approximately 20 to 30 hours meeting with the couple, at least 30 hours designing, researching, and retrieving the décor, and between 10 to 100 hours (depending on the event) decorating the venue and coordinating rehearsals and the event itself. For large events, Cathy will bring team members to assist her.

- 26. Have Tastries employees or independent contractors been disciplined for their participation in wedding celebrations at which Tastries cakes were involved?**

No.

- 27. Have Tastries wedding cakes been delivered or displayed in such a manner that attendees at a wedding celebration knew the cake was a Tastries cake?**

Yes. Cathy's custom wedding cakes are often delivered close to the time that the event begins. Mike, Cathy, or one of her team members will often be seen during delivery and set-up. Guests will ask who designed the cake, and Cathy will receive follow-up custom cake requests from wedding guests.

Some clients even ask for Cathy's business cards to display at the reception. They know that their custom wedding cake will stand as the iconic centerpiece of the wedding celebration and that some of their friends will want to know who designed it. Cathy's clients often share her contact information with those who are interested in commissioning her artistic services.

- 28. Describe all steps, if any, you take to ensure that a Tastries cake is used by the customer to whom it is sold, rather than transferred to a third party.**

Cathy (or one of her team members) meets the person for whom the custom cake is created. She asks about the event, the venue, the theme, the number of guests, and the delivery date. Because most wedding cakes are delivered, someone from the Tastries team sees the actual event in person.

29. How many employees do you employ? If this number has changed since January 1, 2014, please describe the changes, including when the changes occurred.

The bakery started 2014 with nine employees. By the end of the year, Tastries doubled the size of the store and expanded to 18 employees. On average, since 2014, Cathy has employed approximately 15 to 20 Tastries team members. The number fluctuates depending on the season.

30. How many independent contractors work with you? If this number has changed since January 1, 2014, please describe the changes, including when the changes occurred.

Two. Cathy's husband Mike and daughter Katie. In addition, Cathy had a temporary independent cleaning service for part of 2016.

31. Describe the job duties of each Tastries employee and independent contractor.

Although all team members work together to perform bakery duties, Cathy generally divides responsibilities as follows:

Front Team

Stage 1:

- Attend to clients
- Answer the telephone
- Run check out register
- Clean
- Simple pricing
- General support

Stage 2:

- Help with all duties of Stage 1 team members
- Attend clients with simple custom cake requests
- Assisting with cake tastings

Stage 3:

- Help with all duties of Stage 1 and 2 team members
- Meet with clients at cake tastings
- Work on complex custom cake designs

Baking Team

Stage 1:

- Prep dry ingredients and dough
- Prepare simple baked items
- Restock inventory

Stage 2:

- Prepare simple, complex and artistic baked items
- Prepare frostings, flavors, fillings, and other adornments
- Take inventory and restock

Stage 3:

- Possible team leader for baking team members
- Help with all duties of Stage 1 and 2 team members
- Manage inventory
- Recipe collaboration

Decorating Team

Stage 1:

- Simple cake designs (e.g., airbrushing, swirling, quilting, single tier and ease cakes, simple buttercream, fondant covers, dishes)

Stage 2:

- Intermediate cake designs (e.g., writing, piping, sculpting, advanced buttercream, fondant figurines and florals, stacked cakes, simple 3D cakes,)
- Simple cookie decorating

Stage 3:

- Possible team leader for custom design team members
- Complex cake designs (e.g., appliqueing, stenciling, free handing, lacing, metallic artwork, advanced sculpting and 3D, advanced writing and piping, advance fondant figurines, taller stacked cakes)
- Custom cake designing for special events (e.g., weddings, quinces,)
- Advanced cookie decorating

Cleaning Staff

- Cleaning dishes
- Organizing instruments and pans
- Inventory and restocking cleaning supplies

Independent Contractors

- Social media development and activity
- Deliveries and inventory pick-up
- Finance and administrative functions

32. Describe the duties associated with each job title at Tastries. Please provide duty statements for each job title at Tastries.

See Question 31.

33. Provide a list of all employees who have worked at Tastries for the period of January 1, 2014 to the present. For each individual listed state their name, date of hire, employment status, and last known contact information.

See Exhibit B.

34. Provide a list of all independent contractors who have worked with Tastries for the period of January 1, 2014 to the present. For each individual listed state their name, date of hire, employment status, and last known contact information.

Katie Miller; Social Media consultant; started 01/01/2013; phone: [REDACTED]

Mike Miller; Business Advisor; started 01/01/2013; phone: [REDACTED]

35. Provide a description of your policies on harassment. Provide a copy of each written policy, and explain what steps have been taken to implement it.

See Exhibit C.

Policies, including policies on harassment, are reviewed and discussed several times each year at staff meetings (we generally have a team leader meeting most weeks and employee meeting monthly). All policies are reviewed during our first employee meeting in January each year. Tastries is a hospitality company, so all staff are encouraged to focus on customer service and respect to everyone that comes into the store. Cathy teaches her staff that God loves every customer that comes through the door, because God is honored by treating everyone with love and respect.

36. Provide a description of your policies on discrimination. Provide a copy of each written policy, and explain what steps have been taken to implement it.

See Question 35.

Employment

Cathy hires people who are qualified and willing to abide by the bakery policies, regardless of their personal characteristics. Cathy has hired many employees that were members of a protected class.

For example, she hired and rehired an LGBT person. He first joined the team as a seasonal cake designer for one Christmas. He later rejoined the team during his summer break from college. Cathy then hired him as a full-time cake designer after graduation. She paid for his training and worked around all of his scheduling conflicts. He was a skillful cake artist. Cathy loved working with him.

Cathy has also reached out to hire other LGBT people. For example, Cathy wanted to hire Stephanie, the owner of Gimme Some Sugar. All the while, Cathy has sought to continue to work with her as a recognized peer in the local industry.

Cathy welcomes and serves everyone. But she cannot celebrate and promote all messages.

- 37. Describe your policies and procedures for handling customer and employee or independent contractor complaints. Provide a copy of each written policy, and explain what steps have been taken to implement it.**

When someone submits a complaint, Cathy's team member takes down the following information:

1. Name of the complainant;
2. date;
3. telephone number; and
4. the concern.

The team member reports the concern to Cathy. Cathy handles the situation from there and sometimes involves staff that was involved with the issue.

- 38. Describe all complaints of harassment or discrimination made by an employee or independent contractor from January 1, 2014 to the present. Provide a copy of each written complaint of harassment or discrimination made by an employee or independent contractor since January 1, 2014.**

None.

- 39. Describe all complaints of harassment or discrimination made by a potential customer against Ms. Miller since January 1, 2014. Provide any written complaints.**

None before the present complaint.

- 40. Describe all complaints of harassment or discrimination made by a potential customer against any Tastries employee or independent contractor since January 1, 2014. Provide any written complaints.**

None.

- 41. Identify all owners of Cathy's Creations, Inc.**

Catharine Miller – 100% shareholder



State of California Secretary of State

S

Statement of Information

(Domestic Stock and Agricultural Cooperative Corporations)

FEES (Filing and Disclosure): \$25.00.

If this is an amendment, see instructions.

IMPORTANT – READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

1. CORPORATE NAME

CATHY'S CREATIONS, INC.

2. CALIFORNIA CORPORATE NUMBER

C3525303

FQ66224

FILED

In the office of the Secretary of State
of the State of California

AUG-28 2017

This Space for Filing Use Only

No Change Statement (Not applicable if agent address of record is a P.O. Box address. See instructions.)

3. If there have been any changes to the information contained in the last Statement of Information filed with the California Secretary of State, or no statement of information has been previously filed, this form must be completed in its entirety.

☐ If there has been no change in any of the information contained in the last Statement of Information filed with the California Secretary of State, check the box and proceed to **Item 17**.

Complete Addresses for the Following (Do not abbreviate the name of the city. Items 4 and 5 cannot be P.O. Boxes.)

4. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE	CITY	STATE	ZIP CODE
3665 ROSEDALE HIGHWAY, BAKERSFIELD, CA 93308			
5. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY	CITY	STATE	ZIP CODE
3665 ROSEDALE HIGHWAY, BAKERSFIELD, CA 93308			
6. MAILING ADDRESS OF CORPORATION, IF DIFFERENT THAN ITEM 4	CITY	STATE	ZIP CODE

Names and Complete Addresses of the Following Officers (The corporation must list these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

7. CHIEF EXECUTIVE OFFICER/	ADDRESS	CITY	STATE	ZIP CODE
CATHARINE M MILLER	3665 ROSEDALE HIGHWAY, BAKERSFIELD, CA 93308			
8. SECRETARY	ADDRESS	CITY	STATE	ZIP CODE
CATHARINE M MILLER	3665 ROSEDALE HIGHWAY, BAKERSFIELD, CA 93308			
9. CHIEF FINANCIAL OFFICER/	ADDRESS	CITY	STATE	ZIP CODE
CATHARINE M MILLER	3665 ROSEDALE HIGHWAY, BAKERSFIELD, CA 93308			

Names and Complete Addresses of All Directors, Including Directors Who are Also Officers (The corporation must have at least one director. Attach additional pages, if necessary.)

10. NAME	ADDRESS	CITY	STATE	ZIP CODE
CATHARINE M MILLER	3665 ROSEDALE HIGHWAY, BAKERSFIELD, CA 93308			
11. NAME	ADDRESS	CITY	STATE	ZIP CODE
12. NAME	ADDRESS	CITY	STATE	ZIP CODE

13. NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY: 0

Agent for Service of Process If the agent is an individual, the agent must reside in California and Item 15 must be completed with a California street address, a P.O. Box address is not acceptable. If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 15 must be left blank.

14. NAME OF AGENT FOR SERVICE OF PROCESS
CATHARINE M MILLER

15. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL	CITY	STATE	ZIP CODE
3665 ROSEDALE HIGHWAY, BAKERSFIELD, CA 93308			

Type of Business

16. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
EVENT PLANNING/BAKERY

17. BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE CALIFORNIA SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

08/28/2017	CATHARINE M MILLER	PRESIDENT	
DATE	TYPE/PRINT NAME OF PERSON COMPLETING FORM	TITLE	SIGNATURE

DEEH00101



State of California
Secretary of State

S

E-Q64633

FILED

In the office of the Secretary of
State of the State of California

Jan - 31 2013

This Space For Filing Use Only

STATEMENT OF INFORMATION

(Domestic Stock and Agricultural Cooperative Corporations)

FEES (Filing and Disclosure): \$25.00. If amendment, see instructions.

IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

1. CORPORATE NAME

C3525303
CATHY'S CREATIONS, INC.
CATHARINE M MILLER
3665 ROSEDALE HIGHWAY
BAKERSFIELD CA 93308

Due Date:

Complete Addresses For the Following (Do not abbreviate the name of the city. Items 2 and 3 cannot be P.O. Boxes.)

2. STREET ADDRESS OF PRINCIPAL EXECUTIVE OFFICE CITY STATE ZIP CODE
3665 ROSEDALE HIGHWAY BAKERSFIELD CA 93308

3. STREET ADDRESS OF PRINCIPAL BUSINESS OFFICE IN CALIFORNIA, IF ANY CITY STATE ZIP CODE
3665 ROSEDALE HIGHWAY BAKERSFIELD CA 93308

4. MAILING ADDRESS OF THE CORPORATION, IF DIFFERENT THAN ITEM 2 CITY STATE ZIP CODE
CATHARINE M MILLER 3665 ROSEDALE HIGHWAY BAKERSFIELD CA 93308

Names and Complete Addresses of the Following Officers (The corporation must list these three officers. A comparable title for the specific officer may be added; however, the preprinted titles on this form must not be altered.)

5. CHIEF EXECUTIVE OFFICER ADDRESS CITY STATE ZIP CODE
CATHARINE M MILLER 3665 ROSEDALE HIGHWAY BAKERSFIELD, CA 93308

6. SECRETARY ADDRESS CITY STATE ZIP CODE
KATRINA M MILLER 3665 ROSEDALE HIGHWAY BAKERSFIELD, CA 93308

7. CHIEF FINANCIAL OFFICER ADDRESS CITY STATE ZIP CODE
CHRISTOPHER M MILLER 3665 ROSEDALE HIGHWAY BAKERSFIELD CA 93308

Names and Complete Addresses of All Directors, including Directors Who Are Also Officers (The corporation must have at least one director. Attach additional pages, if necessary.)

8. NAME ADDRESS CITY STATE ZIP CODE
JENNIFER S OVERBY 3665 ROSEDALE HIGHWAY BAKERSFIELD, CA 93308

9. NAME ADDRESS CITY STATE ZIP CODE
CATHARINE M MILLER 3665 ROSEDALE HIGHWAY BAKERSFIELD, CA 93308

10. NAME ADDRESS CITY STATE ZIP CODE
CHRISTOPHER M MILLER 3665 ROSEDALE HIGHWAY BAKERSFIELD, CA 93308

11. NUMBER OF VACANCIES ON THE BOARD OF DIRECTORS, IF ANY: 0

Agent for Service of Process: (If the agent is an individual, the agent must reside in California and Item 13 must be completed with a California street address (a P.O. Box address is not acceptable). If the agent is another corporation, the agent must have on file with the California Secretary of State a certificate pursuant to California Corporations Code section 1505 and Item 13 must be left blank.)

12. NAME OF AGENT FOR SERVICE OF PROCESS
CATHARINE M MILLER

13. STREET ADDRESS OF AGENT FOR SERVICE OF PROCESS IN CALIFORNIA, IF AN INDIVIDUAL CITY STATE ZIP CODE
3665 ROSEDALE HIGHWAY BAKERSFIELD, CA 93308

Type of Business

14. DESCRIBE THE TYPE OF BUSINESS OF THE CORPORATION
EVENT PLANNING/BAKERY

15. BY SUBMITTING THIS STATEMENT OF INFORMATION TO THE CALIFORNIA SECRETARY OF STATE, THE CORPORATION CERTIFIES THE INFORMATION CONTAINED HEREIN, INCLUDING ANY ATTACHMENTS, IS TRUE AND CORRECT.

01/31/2013

CATHARINE M MILLER

PRESIDENT

DATE

TYPE OR PRINT NAME OF PERSON COMPLETING THE FORM

TITLE

SIGNATURE

State of California
Secretary of State



E-Q64633

STATEMENT OF INFORMATION

(Domestic Stock and Agricultural Cooperative Corporations)

FEES (Filing and Disclosure): \$25.00. If amendment, see instructions.

IMPORTANT - READ INSTRUCTIONS BEFORE COMPLETING THIS FORM

This Space For Filing Use Only

1. CORPORATE NAME (Please do not alter if name is preprinted.)

C3525303

CATHY'S CREATIONS, INC.

3885 ROSEDALE HIGHWAY
BAKERSFIELD, CA 93308

S

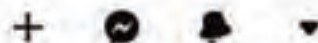
DIRECTORS LIST CONTINUED

NAMES AND COMPLETE ADDRESSES OF ALL DIRECTORS, INCLUDING DIRECTORS WHO ARE ALSO OFFICERS (The corporation must have at least one director. Attach additional pages, if necessary.)

NAME	ADDRESS	CITY AND STATE	ZIP CODE
KATRINA M MILLER	3885 ROSEDALE HIGHWAY	BAKERSFIELD CA	93308



Document received by the CA 5th District Court of Appeal.



Tastries Bakery, Bakersfield

April 8, 2021 · 🌐

Turning 21 is more fun with a cake like this!

❤️🍰❤️ Order today: 661-322-1110

👍❤️ 14

2 Shares

Like

Comment

Share

Write a comment...



Document received by the CA 5th District Court of Appeal.



Tastries Bakery, Bakersfield

October 8, 2021 · 🌐

Cheers to 50 years!!

📞 661-322-1110



3

Like

Comment

Share

Write a comment...

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St. Patty's Day Green Beer

Tastries Bakery
Bakersfield CA



Tastries Bakery, Bakersfield

December 28, 2021 · 🌐

Now taking NYE cookie orders!! ❤️

📞 Call 661-322-1110 to order.

#NYE2022 #HappyNewYear #bakersfieldca 🇺🇸

👍❤️ 14

2 Shares

Like

Comment

Share

See more of Tastries Bakery, Bakersfield on Facebook

Log In

or

Create new account



tastriesbakery • Follow

Bakersfield, California



tastriesbakery Cheers to 21 🥂

#happy21stbirthday #tastries #birthdaycake
#birthdaygirl #cakeideas #sprinklecake
#cakeshop #cakedecorating #cakeart
#cakecakecake 🍰 #bakersfieldbakery #bako
#bakersfield #bakersfieldcake #661
#bakersfieldca #tastriesbakersfield
#tastriesbakery

151w



91 likes

MARCH 26, 2019



Add a comment...

Post

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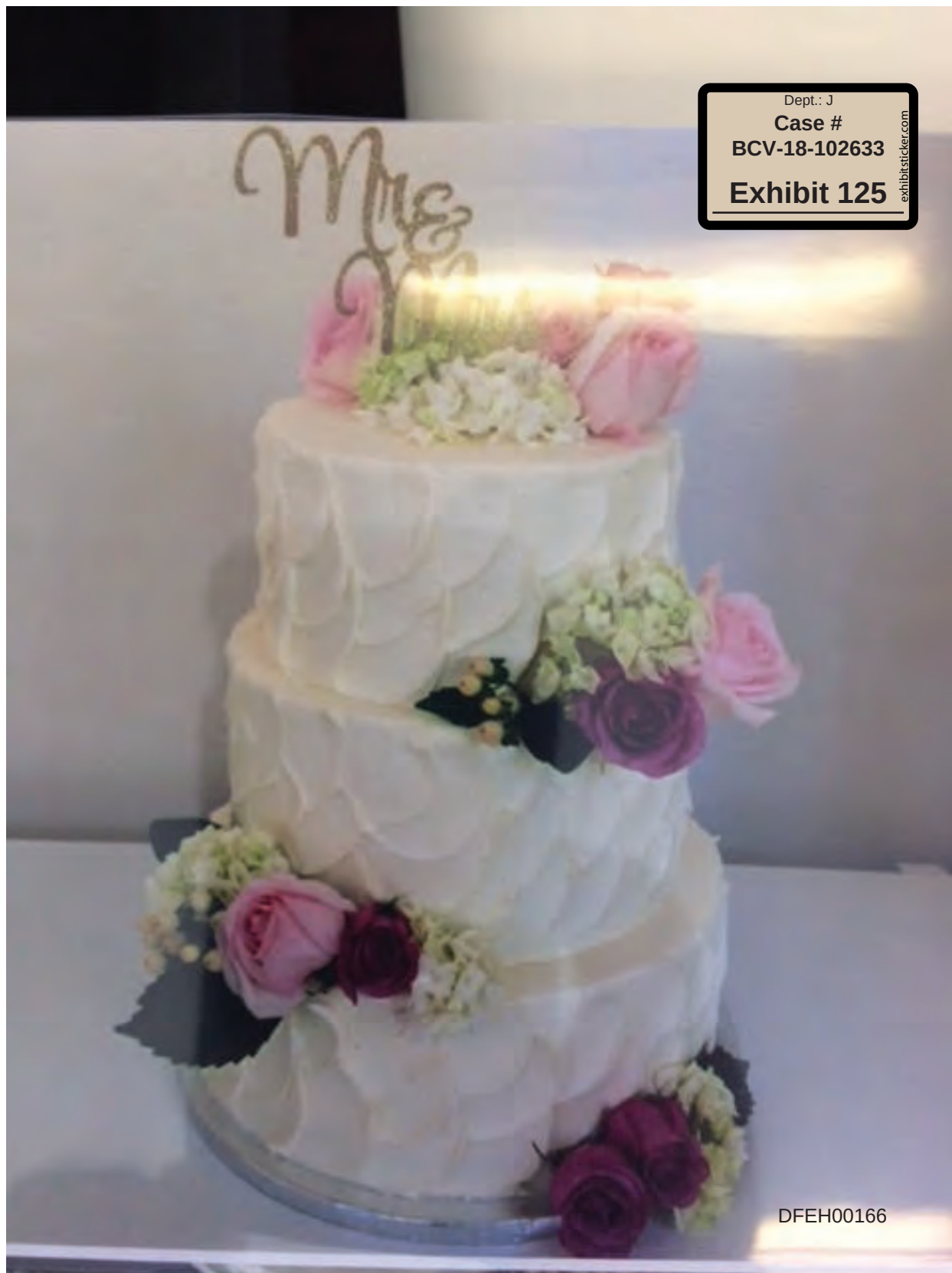


St. Patrick's Day Decorated Cookies

Tastries Bakery
Bakersfield CA



Document received by the CA 5th District Court of Appeal.



DFEH00166

125-001

Document received by the CA 5th District Court of Appeal.



CM-0978

RA.1868

126-001



Dept.: J
Case #
BCV-18-102633
Exhibit 127

Slot Machine Lucky 70th Birthday Cake

Tastries Bakery,
Bakersfield CA

Document received by the CA 5th District Court of Appeal.



Dept.: J
Case #
BCV-18-102633
Exhibit 128
exhibitsticker.com



Tastries Bakery, Bakersfield

October 19, 2021 · 🌐

A wispy buttercream baby shower cake with pink florals to celebrate a new baby girl!

📍 3665 Rosedale Highway

👍❤️ 17

Like

Comment

Share



Write a comment...



Document received by the CA 5th District Court of Appeal.

Dept.: J

Case #

BCV-18-102633

Exhibit 129

exhibitsticker.com



Rustic Buttercream Wedding Cake

White Wedding Cake

• Bank Balance 56,144.72

	DATE *	REF NO. TYPE	PAYEE ACCOUNT	MEMO	PAYMENT	DEPOSIT
Banking						
Sales	09/02/2016		Groupon	GROUPON PAYME		\$51.14
Expenses		Deposit	10300 Funds Awaiting Deposit			
Workers	09/02/2016			5/3 BANKCARD SY		\$70.00
Reports		Deposit	10300 Funds Awaiting Deposit			
Taxes	09/01/2016	Expense	Olive Drive Partners	Online Payment 55	\$3,360.00	
Accounting		Expense	65000 Facility Rent or Lease			
	09/01/2016	1855	Gummi Some Sugar		\$227.50	
My Accountant		Check	10300 Funds Awaiting Deposit			
	09/01/2016		Square Inc	Square Inc 160901		\$60.78
Capital		Deposit	10300 Funds Awaiting Deposit			
	09/01/2016			5/3 BANKCARD SY		\$363.13
Apps		Deposit	10300 Funds Awaiting Deposit			
Track Time	09/01/2016			5/3 BANKCARD SY		\$517.25
		Deposit	10300 Funds Awaiting Deposit			
	08/31/2016		IRS	IRS USATAXPYMT 2	\$34.53	
		Expense	51300 Payroll Payroll Tax			
	08/31/2016		IRS	IRS USATAXPYMT 2	\$2,904.64	



\$227.50

Balance \$2,421.86

Bank Account Chase Checking

Gimme Some Sugar

Online banking matches

Mailing address
Gimme Some Sugar
Payment date
09/01/2016

Check no.



Print later

AMOUNT

227.50

DESCRIPTION

1 Funds Awaiting Deposit Sale transferred to Gimme Some Sugar

2

Add lines Clear all lines

Memo

Total \$227.50

Attachments (Max 10MB each)

Day: 4/25/14

Event Date:

P/U or Del.

Cake Stand #

Phone #:

Name:

Phone #

How did you hear about us?

Email:

of Guests:

Event:

Location:



Emailed picture

Picture Attached

Special Attention

Notes:

General Terms and Conditions:

Payment Terms: 25% non-refundable deposit with full payment required two weeks prior to delivery date. Tazbries Bakery may cancel the order if full payment is past due. Order deposit is non-refundable, but may be applied toward future purchase if order is cancelled more than one week prior to delivery date.

Design Specification: Tastries Bakery provides custom designs to complement event theme and decor. We use customer information (such as color wishes, descriptions and pictures) along with other resources as inspiration for a design based on each customer's request that is suited to the product size and order budget. By placing this order, the customer acknowledges that a specific design has not been guaranteed and Tastries Bakery can make variations to the design as it may determine are appropriate.

Transportation: Bakery orders should be transported on a flat surface at cool temperatures (do not place on a lap or seat). Customer is responsible for the order after pick-up or delivery. Tattaria Bakery recommends delivery service for cakes greater than two tiers.

Rentals: Rented items must be returned within two business days after the event. Items returned late are subject to additional rental charges. Rental items may be used to cover any late fees, damage or extraordinary maintenance.

Tasteful Tips

Flonidant: Should be kept cool but not refrigerated.

FOODS: Should be kept cool but not refrigerated
 DRUGS: Should be kept cool; use recommended refrigeration
 AIR: Should be kept cool

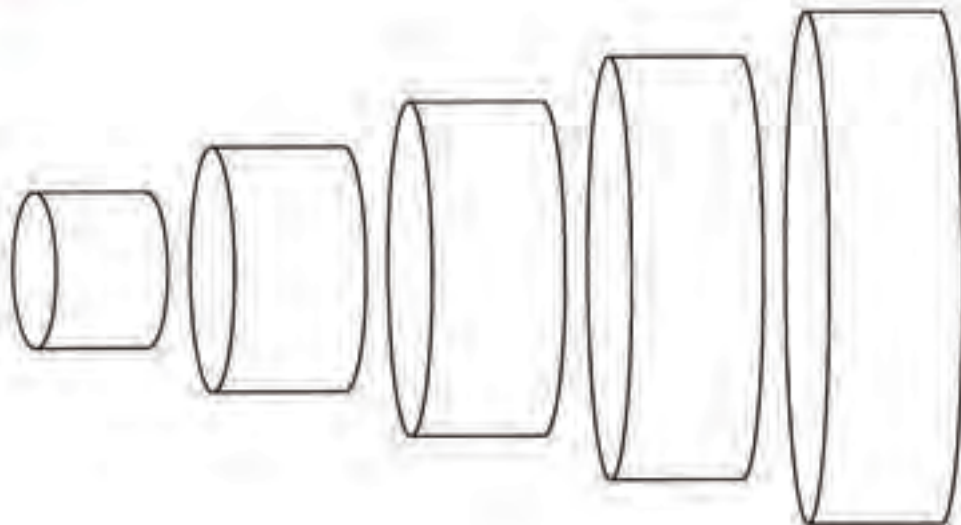
Colored Fondant or Buttercream may fade in sunlight, we recommend keeping your decorated treats away from light exposure until your event is ready to begin.

Customer Signature:

Order Taken by:

Date:

Decorator	#	Items	Total
		Cakes	
		Cupcakes	
		Cookies	
		Treats	
		Rental	
		Rental Deposit	
		Services	
		Delivery	
		Total	
		Deposit	
		Paid	



Cake: F / BC / _____ Round _____ Size: 5
 Color: _____ Tier 1 _____ Cake: _____
 Trim: _____ Filling: _____

Cake: F / BC / _____ Round Size: _____
 Color: _____ Tier 2 Cake: _____
 Trim: _____ Filling: _____

Cake: F / BC / _____ Round _____ Size: _____
 Color: _____ Tier 3 _____ Cake: _____
 Trim: _____ Filling: _____

Cake: F / BC / _____ Round _____ Size: _____
 Color: _____ Tier 4 _____ Cake: _____
 Trim: _____ Filling: _____

Cake: F / BC / _____ Round _____ Size: _____
 Color: _____ Tier 5 _____ Cake: _____
 Trim: _____ Filling: _____



Notes

Fondant Figures	Price
Total	

11

Base Cake Price		
*Flavors	\$10 each	
*Gourmet Fillings	\$5 each	
**Over the Top Fillings	\$10 each	
Fondant Figurines		
Fondant Flowers		
Edible Image	\$20 each	
Total		

Ted G. Freitas

<https://www.facebook.com/ted.g.freitas>

The screenshot shows the Facebook profile of Ted G. Freitas. The profile picture is a photo of Ted and a woman. The cover photo is a blue and white abstract image. The name 'Ted G. Freitas' is prominently displayed. Below the name are buttons for 'Add Friend' and 'Message'. The navigation tabs include 'Timeline', 'About', 'Friends', 'Photos', and 'More'. A section titled 'DO YOU KNOW TED?' prompts users to send a friend request. The 'Photos' section shows a grid of images, including a person in a red shirt, a sunset, and a sign that says 'Allowed for Win'. The 'Friends' section is visible below. The 'Featured Albums' section shows a list of albums with language options: English (US), Español, Português (Brasil), Français (France), and Deutsch. The main post is by Ted G. Freitas and Adam Ramos, dated August 28 at 12:37pm. The text of the post describes a wedding cake tasting incident where a woman refused service. Below the text is a photo of a 'Tastries' bakery storefront, which is circled in red with a large red 'X' over it. The post has 123 reactions.

Ted G. Freitas

DO YOU KNOW TED?

To see what he shares with friends, send him a friend request.

Photos

Friends

Featured Albums

English (US) · Español · Português (Brasil) · Français (France) · Deutsch

Ted G. Freitas · **Adam Ramos**

August 28 at 12:37pm · 49

So the fiancé and I are out cake tasting in Bakersfield for OUR BIG DAY and the lady helping us (I have another name for her) ask's, "So this is for the bride and goom?" (turning to Adams's Mom) Uh, no it says Adam and Ted on your form! When we let her know, that it's for us, she quickly (without hesitation) replies "Well I'm going to transfer your order to Stephanie @ Gimme Some Sugar Cakes". She stands up, walks away, and calls Stephanie to "transfer" us (I think she meant to say REFUSE SERVICE to us) and refer us for an appointment. After she leaves a voicemail with Stephanie she comes back to update us and says "OK, I've called her and left a message. We can do the design and Stephanie can do the filling. Your welcome to stay and enjoy MY cupcakes, ..." and walks off #discrimination is alive and well in this Ted up world. #loveislove

Tastries

Like · Comment · Share

123

Document received by the CA 5th District Court of Appeal.

CM1900

Alexander Gregory Looks like gimme some sugar found their niche in the bakery market. I wonder how the conversation went between those two that she just automatically knows to refer you there.

Sorry you had to deal with that.

Like · Reply · 1 · August 26 at 1:29pm

Ted G. Freitas Idk but I'll let you know. I'm curious too.

Like · Reply · 1 · August 26 at 1:54pm

Joey Garcia On the flip side Gimme some sugar is very pro LGBT because the owner is in fact a part of our community. So it helps our little niche here in town as well. And their cakes are delicious!

Like · Reply · 7 · August 26 at 3:21pm

Gimme Some Sugar Cakes Thanks Joey!! I hope they give me the honor of making their day special 😊

Like · Reply · 1 · August 28 at 11:39am

Joey Garcia I'm getting married next year and I'm definitely gonna head your way! 😊

Like · Reply · 1 · August 28 at 11:45am

View more replies

Scott Sallee Typical Bakersfield. I used to live there. It might as well be Arkansas.

Like · Reply · 3 · August 26 at 4:25pm

Johnny Esparza Actually no Scott. Typically we don't treat people from the lgbtq community like that in any business here in town. I belong to the BBB here and I can say that Bakersfield as a whole does not and will not stand for this kind of behavior towards any community!

Like · Reply · 3 · August 27 at 4:09am

Write a reply...

Whitney Equality Weddell Ted, I sent you a PM. Let's follow up on this.

Like · Reply · 2 · August 26 at 4:46pm · Edited

Joseph Lorta That is foul Ms. Weddell. As a respected leader I thank you for standing up for those of us who are not as brave enough to speak out.

Like · Reply · 1 · August 27 at 7:19am · Edited

Write a reply...

Marshelle Fernandez Screw them Adam Ramos! You don't want to give people like that your patronage or hard earned cash anyway!!!! You need to talk to your past coworker Jessica Lara...she does beautiful cakes and I'm sure the price would be much less then what you would have paid at that Homophobic establishment!!!!

Like · Reply · 2 · August 26 at 11:10pm



Ted G. Freitas Just so we are clear, the intent of my post was never meant to harm anyone. I was just venting my frustration as Adam and I have NEVER been refused service before because of our orientation. That said, Adam and I would like to clarify a few things regarding OUR experience and how WE feel.

We had gone into Tasteries bakery twice (over a period of 2 months) talking with the Tasteries staff asking them questions about what services they could offer us for our same sex wedding. We DID NOT at any time hide the fact that we were two engaged men looking to buy a wedding cake. Staff on all occasions were more than happy to help us and even offered for us to attend one of their cake tasting events which we signed up for. Tasteries even called Adam two days prior to the tasting event to confirm we would still be attending. We arrived early for our appointment, and were greeted warmly by a staff member who confirmed we were on this list and sat us at a table. While we were waiting for Adam's mom to arrive to join us in the tasting, Adam started filling out the order/design forms. Once Adam's mom arrived we helped ourselves to the tasting bar and took our samples back to our table. Cathy came over to our table, looked over the order forms and thanked us for filling everything out for her. Then, instead of acknowledging that Adam and I were the engaged couple as listed on the forms Adam had just filled out, she looked at Adam and his mom and asked if THEY were the ones getting married. Adam politely corrected Cathy and said that was his mother and that he and I were engaged and looking to order a cake. Without hesitation, Cathy said she was going to "transfer" us to another bakery. Since Adam had already filled out the order forms with our cake design, size, etc, she said she would take our design ideas and forward them to a competing bakery and they would handle our order. She quickly left to call the competing bakery to have her follow up with us. After making the call she came back to our table, took the clipboard and paperwork away from us saying "you wont be needing this", told us to enjoy her cupcakes, and walked away into back of the bakery. Confused as to what had just happened we quickly ate our samples we had already brought to our table and left. After leaving the bakery and attending other wedding related appointments we had scheduled, Adam decided to call Tasteries to talk to Cathy to ask why she could not do business with us. Unfortunately Adam was unable to talk to Cathy as she was "unavailable", but through conversation with staff it was confirmed that Cathy transferred us to another bakery due the fact that we are a same sex couple. (Staff did not agree with her decisions)

Our only frustration here is how the whole situation was handled. Had it been disclosed to us upfront during our initial visit that Tasteries does not cater to same sex couples, we would have gladly taken our business elsewhere. But having been strung along and going as far as scheduling/confirming a tasting/consult with Tasteries, then being told they will not fulfill our order is wrong. As it turns out another same sex couple was strung along through the same process, only to be refused service the same day as us. Our advice to Tasteries is that Cathy and her staff all get on the same page and disclose to same sex couples from the very beginning that they do not cater to same sex couples...if that is what this bakery chooses to do. As stated before, we meant no harm by our post and did not know it would go viral. We hold no ill will against Cathy personally, and we have no intent on taking any legal actions. We just wish she would have handled the situation in a better manner, and we will no longer be doing business or referring anyone to Tasteries.

Adam and I believe in treating everyone equally regardless of who they are or their beliefs. With that said we appreciate all the love and support we have received from everyone. We love you all.

Like · Reply · 26 · August 27 at 11:17am



John Wilson Thanks for posting this. I appreciate people that may be upset/angry with someone's beliefs but to bully them and try to put them out of business makes the people doing it far worse than the people that aren't servicing you.

Like · Reply · 2 hrs

From: Patrick Grijalva <[REDACTED]>
Date: September 17, 2017 at 1:17:39 PM PDT
To: De Coeur Bake Shop <decoeurbakeshop@gmail.com>
Cc: [REDACTED]
Subject: Re: Wedding tasting

Hi Mai,

I apologize for not getting back to you. Things have been a little chaotic with the wedding planning as you might imagine. Yes, you are correct. We sincerely appreciate your dedication and time in meeting with both Mireya and myself. We enjoyed your attention to detail as well as your expertise. Mireya and/or I will definitely keep your bakery in mind for any future endeavors.

Kindest Regards,

Patrick

Sent from my iPhone

On Sep 17, 2017, at 1:01 PM, De Coeur Bake Shop <decoeurbakeshop@gmail.com> wrote:

Since we haven't heard back from you regarding whether or not you would like to move forward with this wedding and seeing as how it is less than a month away and we still have no confirmation or deposit from you we are going to assume you will not be needing your services for the wedding cake!

Best wishes,

Mai

On Aug 26, 2017, at 1:12 PM, Patrick Grijalva <[REDACTED]> wrote:

Good afternoon,

We had a cake tasting back on August 15th and Chef Mai said she would send a contract with all updated information. I haven't received anything and just wanted to follow up.

Document received by the CA 5th District Court of Appeal.

DFEH00222

Thank you,
Patrick

Sent from my iPhone

On Aug 2, 2017, at 12:05 PM, De Coeur Bake Shop
<decoeurbakeshop@gmail.com> wrote:

Hello Patrick,

I just spoke to you over the phone.
We agreed on a cake tasting for August 15th at 1
pm.
You would be tasting: Chocolate with Salted
Caramel, Vanilla with Lemon Curd, and Lemon with
Strawberry Pure.

I will attach some documents with more
information.
Please, bring the wedding contract completed to
the tasting.

Thank you,
Cynthia



WEDDING CONTRACT MASTER JAN 2016
LAST UPDATE



Wedding Cake Packet



CAKES AND FILLINGS

[DE ♥ COEUR]

bake shop

(661) 241-3405
1818-1820 G. ST
BAKERSFIELD, CA 93301

www.decoeurbakeshop.com

TUES-THU
7:30AM-3PM

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DFEH00224

[DE ♥ COEUR] *bake shop*

1618 G Street ▼ Bakersfield, California 93301 ▼ 661-241-3405 ▼ decoeurbakeshop@gmail.com

WEDDING CONTRACT

Client Name(s):

Phone:

Email:

Wedding date:

Reception Venue:

Ceremony Time:

Reception time:

Delivery Time:

Number of Guests:

Day-of Coordinator:

Cake Specifications:

-Deco details

Topper/Fresh florals?:

Cake Total:

Delivery: \$55

Document received by the CA 5th District Court of Appeal.

DFEH00225

Grand Total including deco and delivery/setup fees:

Deposit: 25% of total =

Payment Status:

- Info Needed:

Notes:

Balance Due:

Payment/Terms and Conditions:

-A 25% deposit will be required 3 months prior to the wedding date and the cake needs to be paid in full, 3 weeks before the event date.

-Payment forms accepted: Cash, Debit/Credit cards, Checks made out to "De Coeur Bake Shop" and PayPal.-Cancellation and or modifications must be made two weeks in advance.

Signature: _____

Date: _____

DCBS Manager Signature: _____ Date: _____

Document received by the CA 5th District Court of Appeal.

DFEH00226

[DE ♥ COEUR] *bake shop*
Weddings



Document received by the CA 5th District Court of Appeal.

DFEH00227

BONJOUR!

Thank you so much for considering De Coeur Bake Shop as a potential wedding cake/dessert vendor.

We appreciate your interest very much and are here to make the task of choosing the right flavors, size and logistics easy and fun!

We do everything from traditional to creative and unconventional as it pertains to taste, flavor combinations, design and presentation. Attached you will find all the preliminary information on cake sizes, flavors, prices and information on setting up a tasting with us!

Call, email or drop by to schedule an appointment for a cake tasting and/or initial consultation. If you're a multi-tasker like us, we recommend booking both for the same date! If you would prefer to have your tasting and consultation separately, please let us know!

Thank you again and congratulations on planning the celebration of a lifetime!

Warmest regards,

Mel Giffard

Owner

[DE ♥ COEUR] *bake shop*

1818 G St

Bakersfield, CA 93301

(661) 241-3405

decoeurbakeshop@gmail.com

<http://decoeurbakeshop.com>

Document received by the CA 5th District Court of Appeal.

DFEH00228

Wedding Cake Price & Size Reference Sheet

Base prices (does not include any deco fees):

Buttercream Coverage: \$6.00/serving

Fondant Coverage: \$7.50/serving

Size reference chart:

Round cakes:

6" Serves 10

8" Serves 20

10" Serves 30

12" Serves 45

14" Serves 75

Square cakes:

6" Serves 15

8" Serves 30

10" Serves 50

12" Serves 75

Based on servings needed, the chart above will help give you an idea of what size cake you want and the number of tiers.

A common alternative to a large tiered cake is getting a small (two -3 tier cake) and making up the rest of the servings with a sheet cake for their cutting and serving their guests. This is an option we provide- SHEET CAKES serve 75 and are priced at \$169. They are 12" squares that come with buttercream icing- no deco (unless specified, with added deco fee) that can be cut to serve. Of course we also offer sheet cakes in smaller sizes as well. Please Inquire if this is an option you would like.

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DFEH00229

Standard Deco Fee i.e. buttercream monogram, scrolling, swiss dots etc. is \$25+ depending on complexity.

Fondant Deco i.e. cut outs of shapes, letters, to sculpted figures (can be applied on buttercream cakes) range from \$30+.

Custom Toppers available, please inquire (i.e. fondant sculpture, hand painted custom cut outs, hand made edible flowers, edible images).

Flavors include but are not limited to:

Red Velvet, Carrot with pecan praline, Carrot with cream cheese German Chocolate, Vanilla (with any filling including seasonal fruit jam, lemon curd, or macerated berries- when in season), Marble, Lemon, Chocolate, Maple bar, chocolate with salted caramel, Vanilla with salted caramel, S'mores, Honey-pistachio, lemon, chocolate vanilla.

*s'mores, maple bar, german chocolate, carrot with pecan praline, and German chocolate are considered specialty flavors, as are any cakes with nuts or berries.

We take any combination of flavor requests as well and offer seasonal specials. We also offer gluten-free and vegan cakes.

And since it is YOUR special day, we urge couples who have difficulty selecting flavors to think of their favorite dessert, first date dessert, a nostalgic dessert from their respective childhoods...anything that has sentimental associations are always great points of inspiration for a unique and custom wedding cake!

Cake tastings are always encouraged and it is always a great idea to book a cake tasting and consultation meeting for the same time! Please book your tasting 1-2 weeks in advance. We suggest 2-4 cake flavors and fillings (any combination you want) and you are free to taste while we talk design etc. or you are welcome to take them home and share/taste at your convenience. Each slice is \$3.25 and includes consultation services. We suggest clients bring in inspiration photos, color swatches, pictures of toppers/floral details/ and be prepared to discuss design, venue, number of servings, weather conditions etc! Don't worry, we will have all those questions ready but it doesn't hurt to start thinking before your meeting with us! If email is a good means of communication feel free to email photos and descriptions of any of the above and any questions that YOU might have! Also, please print out and fill out our Wedding Cake Worksheet and bring it to your tasting/consultation appointment or scan and email it to us!

Setup is included in price, other fees include:

Delivery \$55

Cutting/serving: Please inquire.

DISCLAIMERS:

- High temperatures call for delivery of your cake as close to reception time as possible unless your venue has a refrigerator and/or if you are displaying your cake indoors.
- In high temperatures we would advise against displaying your cake outdoors and would also strongly suggest fondant coverage.
- We do not provide cake stands but are happy to suggest local vendors that do!
- Wedding cakes should sit no longer than 4 hours on display- especially in warm weather.

MISC.

- We always suggest you ask your florist to provide flowers to adorn your cake to ensure your flowers match the wedding arrangements as we only offer sugar flowers and not fresh ones.
- We are happy to adorn your cake with flowers and/or a topper as long as they are set out on the display table when we arrive to deliver.
- We would love to have a day-of or coordinator and/or venue coordinator contact number and email!

TRAVEL FEES:

We are honored when a couple wants us to travel with or to them, but we need to be booked at least 3-4 months in advance to guarantee our availability to travel. We charge \$1.25 a mile to travel, round trip, on top of the standard flat rate. If an overnight stay is necessary (depending on distance) we will figure an estimate on a case by case basis. Please call us or meet with us in person if traveling is necessary for your big day!

[DE ♥ COEUR] *bake shop*

1818 G Street ▼ Bakersfield, California 93301 ▼ 661-241-3405 ▼ discocourbakeshop@gmail.com

Cake and Fillings

CAKES:

- Vanilla
- Chocolate
- Graham
- Red Velvet
- Marble
- Carrot
- Chiffon
- Strawberry
- Coconut
- Lemon
- Vegan (any of the flavors above *additional charge)
- GF (any of the flavors listed above *additional charge)
- SF (any of the flavors listed above except Graham and Carrot *additional charge)

*Additional Charge

** CAN NOT BE MADE VEGAN

Document received by the CA 5th District Court of Appeal.

DFEH00232

FILLINGS:

- Vanilla Buttercream
- Vanilla Bean Buttercream
- Salted Caramel Buttercream**
- Chocolate Buttercream
- Coconut Buttercream
- Sweet Almond Buttercream (we fold in toasted almond flour and extract)
- Espresso Buttercream
- Lemon Buttercream
- Mocha Buttercream
- Vanilla Custard**
- Lemon Curd **
- Lemon Curd** with Blueberries or Strawberries or Raspberries
- *additional charge
- Lemon Curd** with Blueberries
- Macerated Berries (of your choice or mixed, simply tossed with sugar, vanilla bean and vanilla extract) *additional charge
- Strawberry Puree *additional charge
- Raspberry Puree *additional charge
- Chocolate Ganache (simply dark chocolate and cream, like a Truffle, smooth and rich) *additional charge
- Chocolate Salted Caramel** (Chocolate Ganache with Salted Caramel)
- *additional charge
- Chocolate Sea Salt (Fleur de Sel) (Chocolate Ganache Sea Salt)*additional charge

*Additional Charge

** CAN NOT BE MADE VEGAN

Our Signature Specialty Cakes: *additional charge

- S'mores**:
 - Graham cake, molasses simple syrup filled with molasses-cinnamon buttercream, house made marshmallow whip, dark chocolate ganache. Outside: frosted with molasses buttercream or vanilla if there is to be custom deco.
- German Chocolate**
 - Rich German Chocolate cake, coconut pecan filling. Outside: milk chocolate buttercream (makes for limited custom deco- but is possible, please inquire).
- Maple Bar
 - Inspired by a classic donut that many love! Vanilla cake, maple simple syrup, filled with maple buttercream.
- Honey Almond Gluten Free **
 - Delicious for those who love honey, and the gluten free part is just a perk as it's a wonderful cake for anyone. Almond flour, honey, leavened with egg whites for a light texture, and filled with vanilla buttercream. Outside: Vanilla Buttercream, toasted almond slices and drizzle of honey (for custom art we omit the nuts and honey).
- Guava Chiffon**
 - Our classic, fluffy chiffon, with a twist. Real Perfect Puree Guava puree is used in the batter. Filling: grapefruit mousse. Outside: Blood Orange and Lemon glaze- perfectly tart to offset the sweet (makes for limited custom deco- but is possible, please inquire).

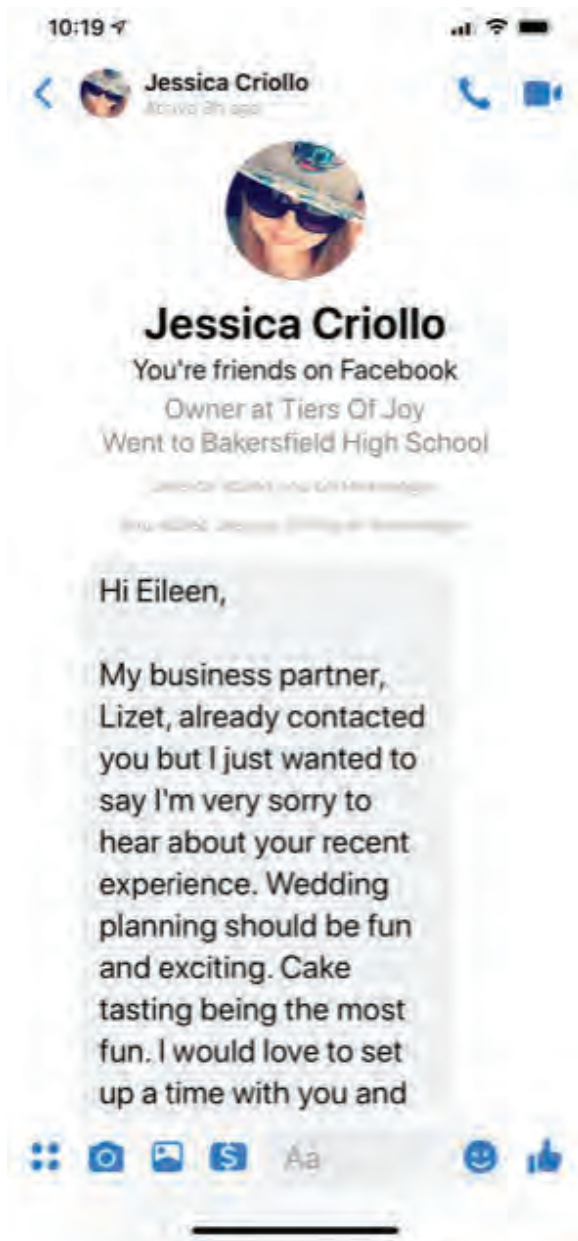
*Additional Charge

** CAN NOT BE MADE VEGAN

WE LOVE TAKING SPECIAL REQUESTS (subject to seasonal product availability) so we are not limited to what is listed above. Please feel free to inquire about a cake or filling flavor you do not see, or let us know your party's theme, or the nostalgic flavors you are interested in and we can make it happen!

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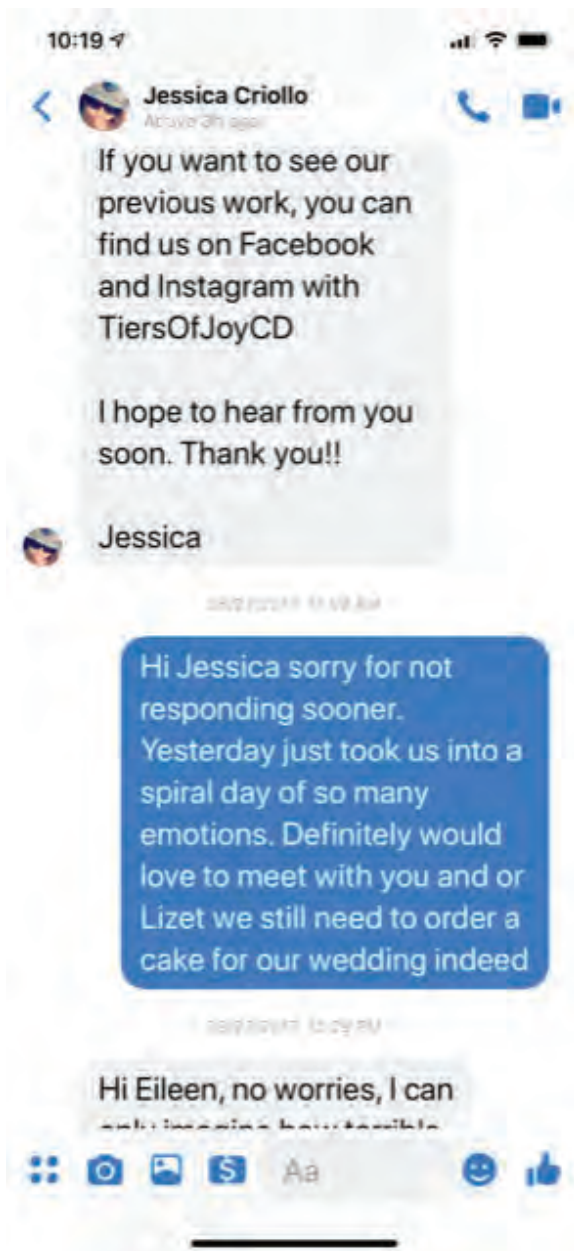
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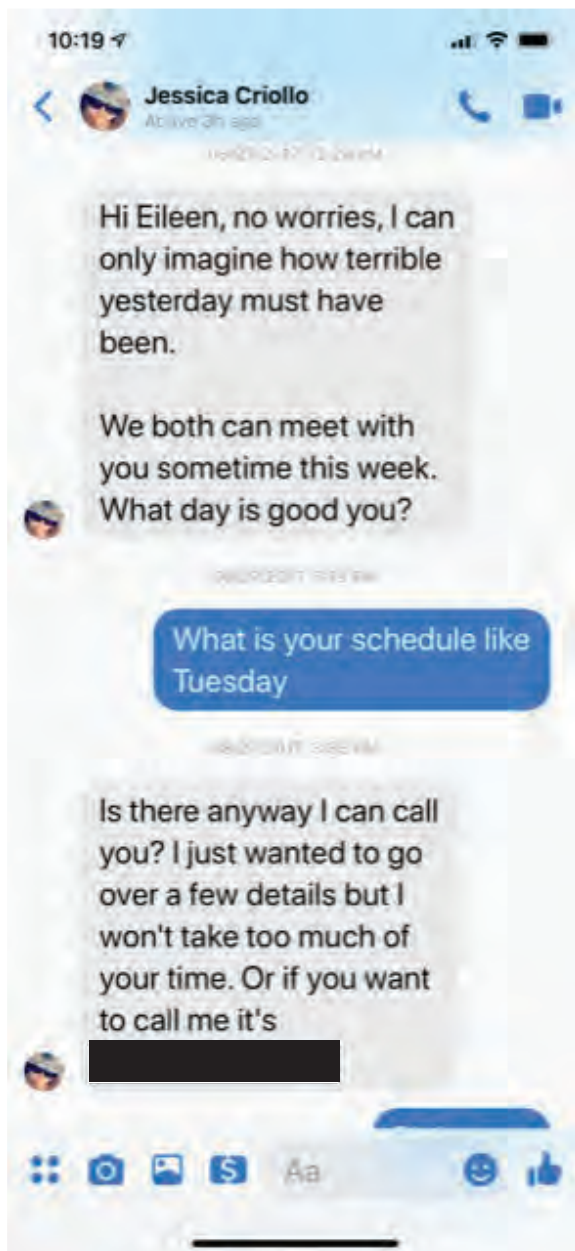


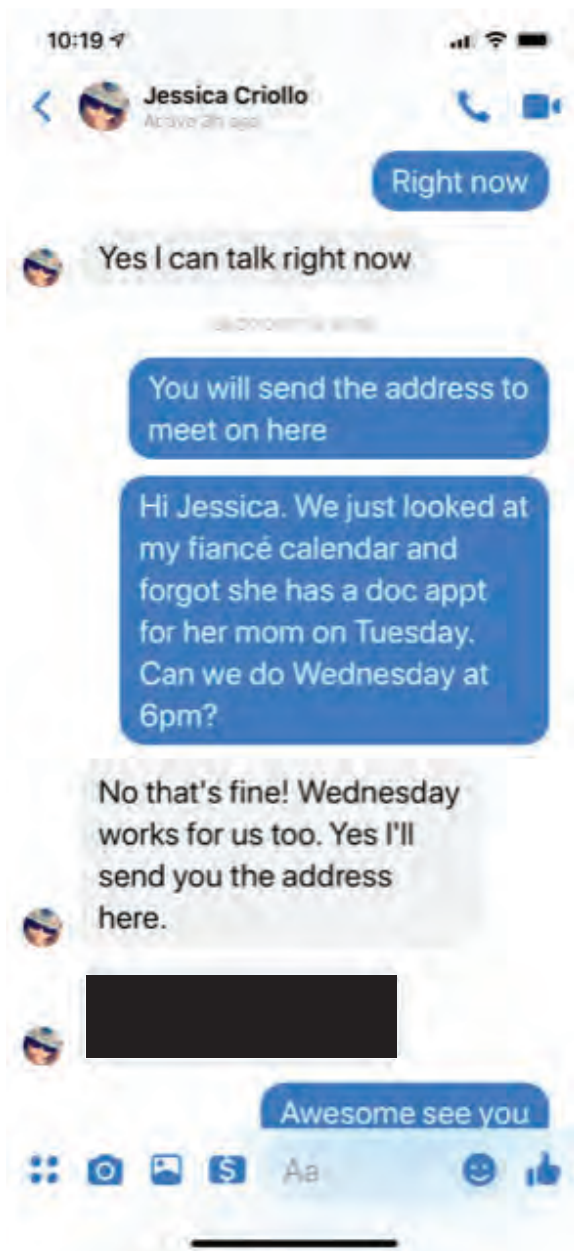
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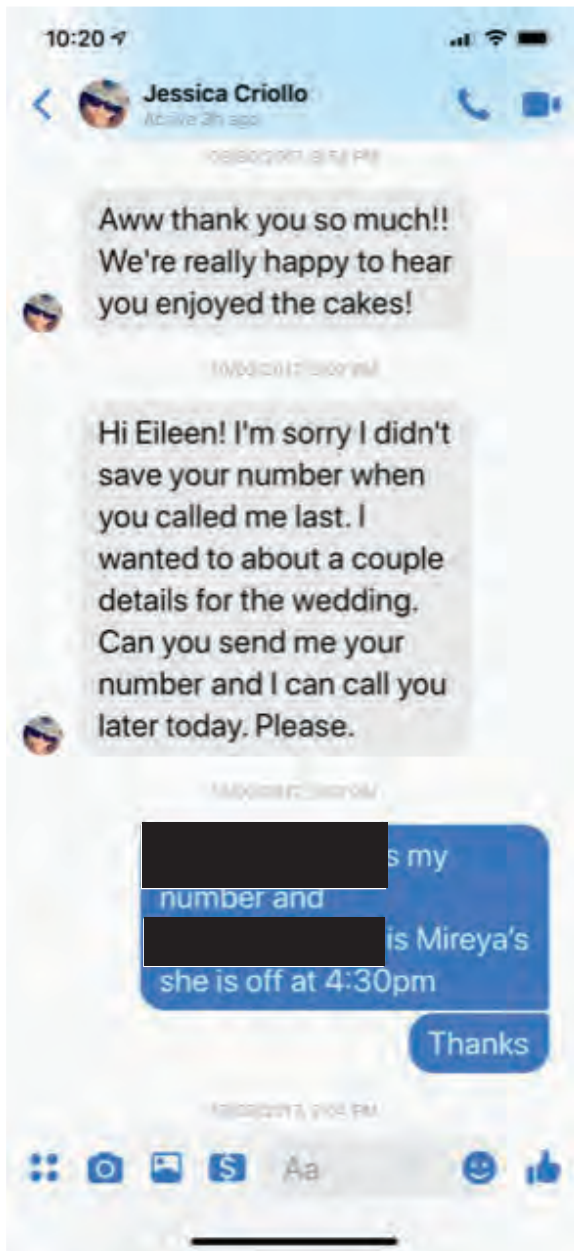
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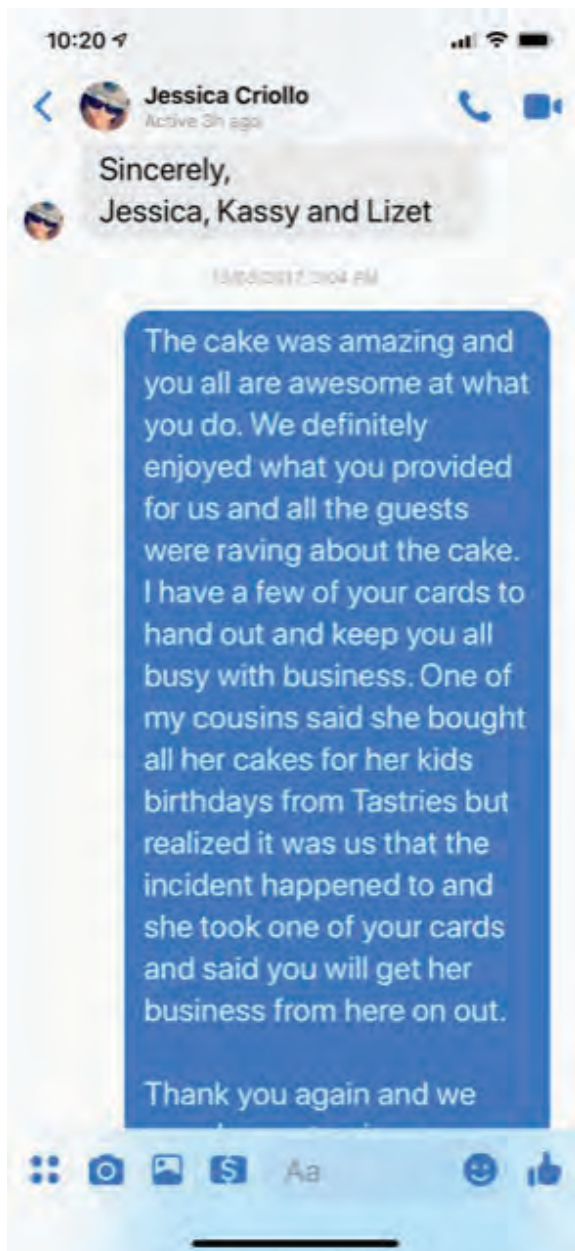


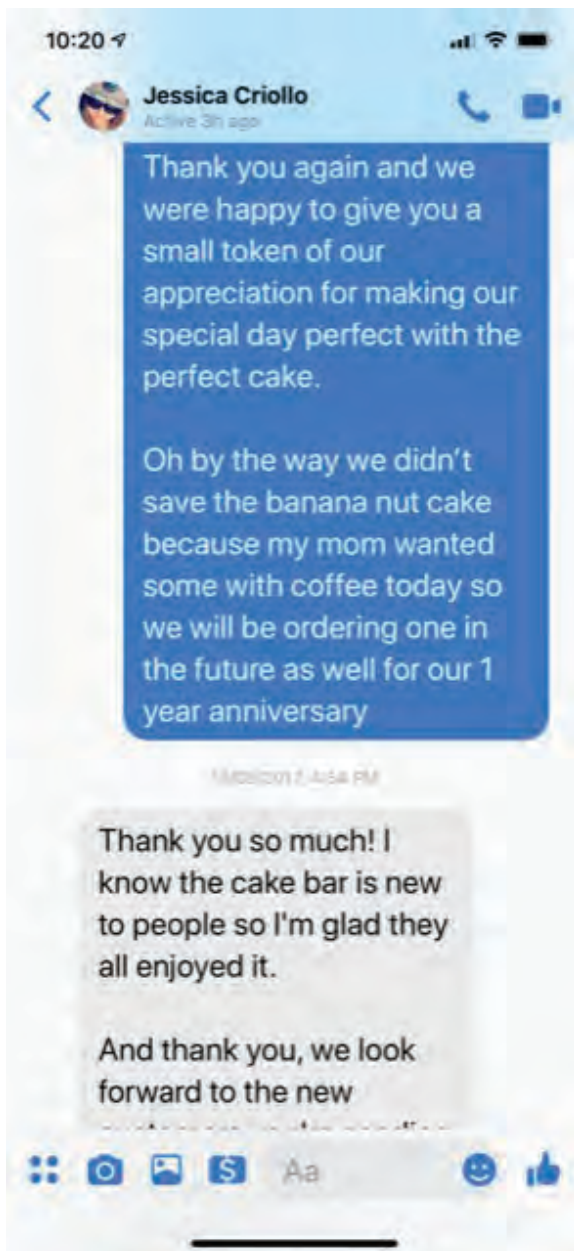














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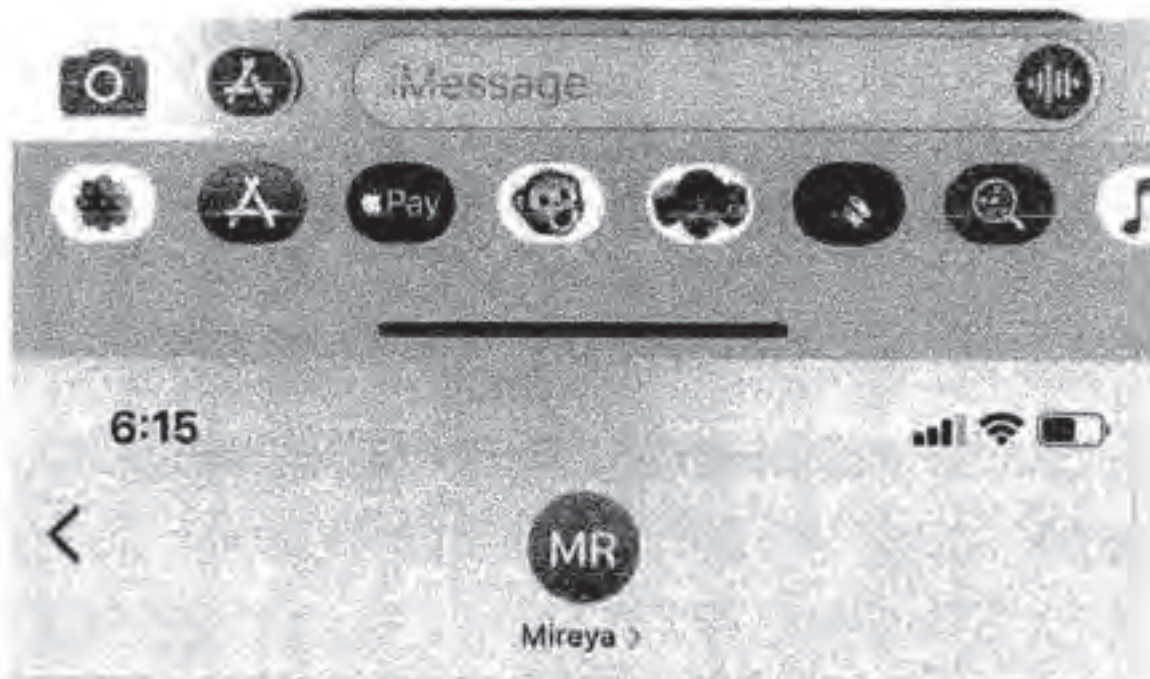
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PAT0059

ready 🌍

I sure will

Feb 6, 2017, 10:33 AM



Jul 7, 2017, 9:31 AM

Hi Chickenbutt! Are you working this weekend?

No friend. But I do have the foam glow run tomorrow evening

What's up

Just wanting to see if you wanted to get together in the morning to maybe go to a flower shop or something to start looking into your bouquet. I'll have to arrange a cake tasting soon but maybe we can talk about that a little more together.

Just feel bad that I haven't had a

PAT0060

RA.1904



PAT0002

RA.1905



ED

Sarah Salazar

Very pretty!

MR

I like it!

Mireya Rodriguez

It's not white white. It has like a light rose gold

MR

Eileen Del Rio

ED

Yes

It's beautiful!



Apr 22, 2017, 8:15 AM

So am I still meeting Eileen at noon for tuxes?

Mireya Rodriguez

MR

Are you still up to it

I am but you guys just let me know

Mireya Rodriguez

Woke up with her. I'll be there to

MR take the dog to the doctor at 3.

Sam Salazar

MR Dang you already made her sick?

Mireya Rodriguez

Lmao.

MR No, She getting a full check up. To make sure she good

Ok we're going to head out to the home and garden show and then we'll head over there at noon.

Mireya Rodriguez



Eileen Del Rio

Pat just a thought and I will leave it up to you. If you have black slacks and black vest and a white dress shirt all we would need to get for you is the bow tie from Mr Tudexo

MR Tuxedo

Sam Salazar

MR Poor mister tuxedo. Just trying to make a living.

Eileen Del Rio

Lmao well we were talking and was like if peeps have it why rent it

MR If u want to rent it I'm cool with that too but want to be reasonable

Sam Salazar





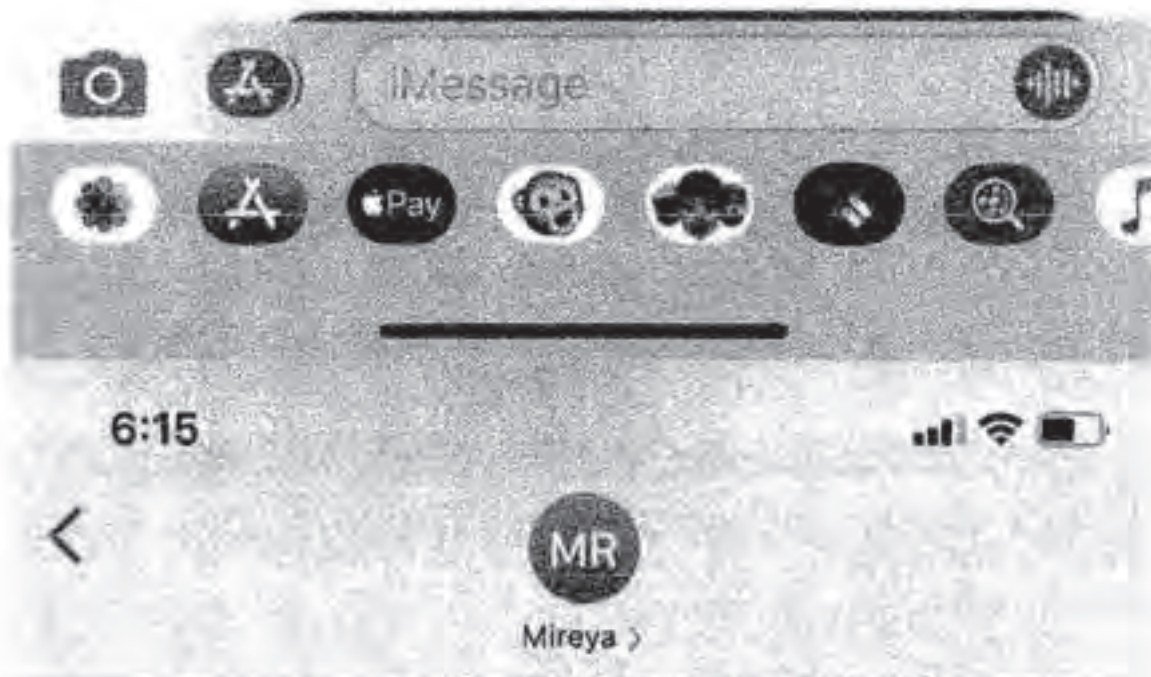
ready 🐼

I sure will

EXHIBIT

506

Feb 6, 2017, 10:33 AM



Jul 7, 2017, 9:31 AM

Hi Chickenbutt! Are you working this weekend?

No friend. But I do have the foam glow run tomorrow evening

What's up

Just wanting to see if you wanted to get together in the morning to maybe go to a flower shop or something to start looking into your bouquet. I'll have to arrange a cake tasting soon but maybe we can talk about that a little more together. just feel bad that I haven't had a

PAT0060

RA.1910

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chance to work on with you.

You been busy friend. And I've been lazy.

Do you think they will be open on Sunday and we could look into that

I have to go try my gown on today. But I also have to go pick up the packet for the run

Ok, let me see if anything is open on Sunday. I don't think there is but I'll look into it.



Ok. If not tomorrow morning

I'll let you know what I find out this evening so I can let you know in enough time.

Ok. Tnx

PAT0061

RA.1911

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I just did a very quick search on local floral shops and I haven't seen any that are open on Sundays. Most of them are open on Saturdays.

Ok. Then tomorrow it is

Do you want to do like 2 or 3 places or how do you want to do it

Lol ok. We can do that so you can have some options especially on pricing. I think it would be good to start early to try and beat the heat. That's a big try lol!

Start thinking of some of the colors and favorite flowers you like

The way we can have more of a direction and make it easier

Ok I will. Tnx



I'm thinking 9:00 or 9:30. Is that too early for you?

It's fine

Ok I'll text you in the morning

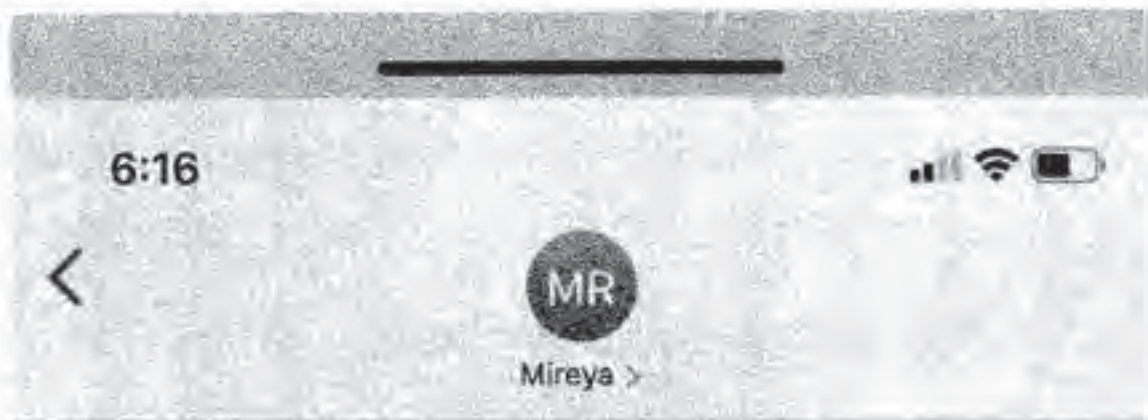
Ok

Jul 8, 2017, 8:36 AM

Good morning! Do you want to meet up at Bakersfield flower market downtown at 9:30?

Sure. I'll have to google the place but I'll see you there





Ok. Cool. Tnx



You here?

On 24

Chester

I mean 23

You have to go in through the back parking lot of environmental health. It goes into the street.

On M street

Ok

Jul 8, 2017, 3:45 PM

Ok I shared the pictures with you through iCloud. Let me know if you got the invitation to view them.

PAT0064

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Ok

Yay. I got them



Ok there were too many to send so I'm glad it worked!

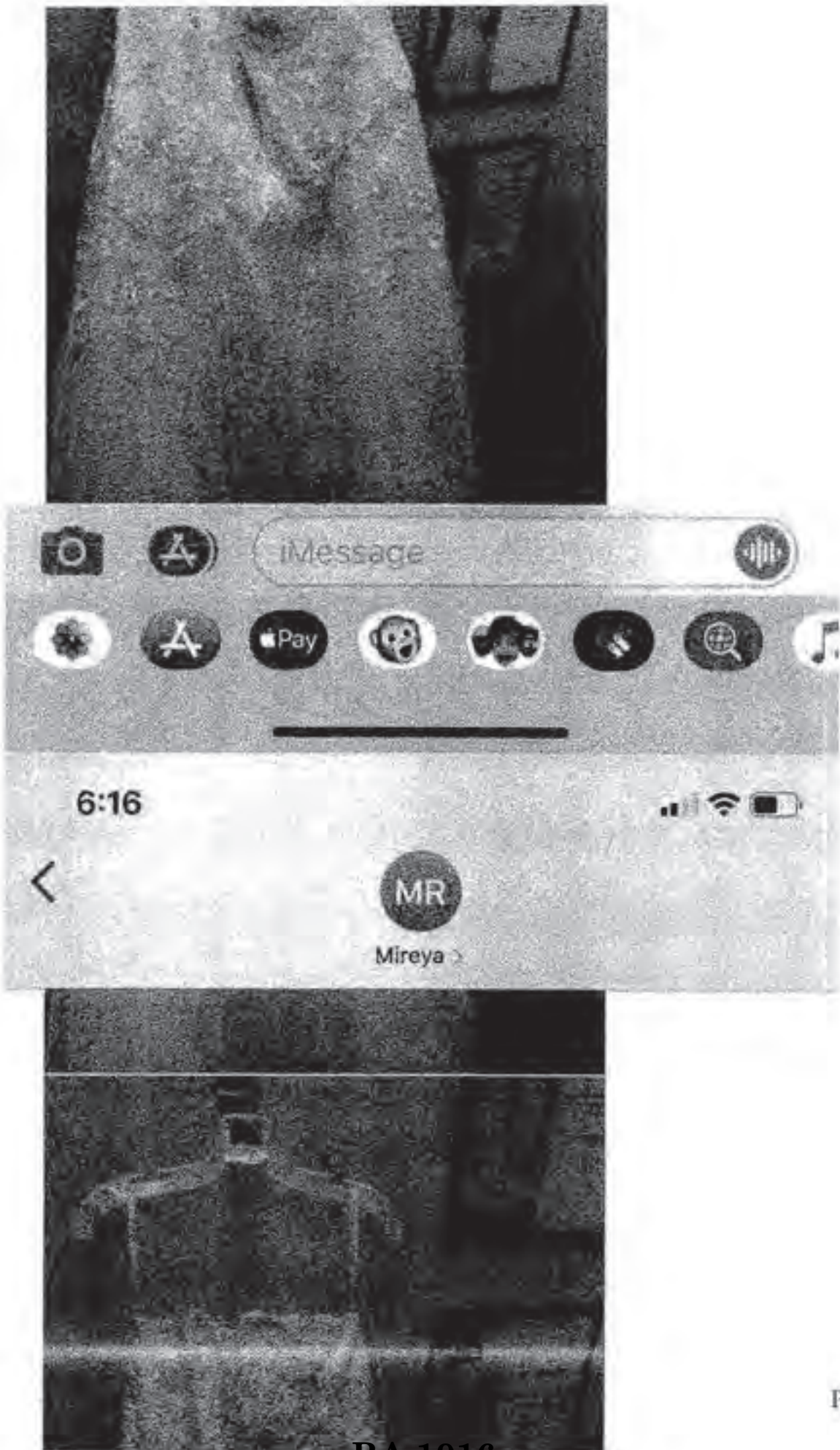
You can add to the album too

Ok. Sweet. Tnx

So I went to try my dress and now that I have it. The blue is not going to match it

Bcuz it has that rose gold layer





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PAT0066



I send you 2 pics and you could see what I mean

Oh I see what you mean. We can scrap the blue and stick to pale pinks, pinks, whites and creams instead. Let me find some stuff and I'll put it in the album.

Ok



I still like some of the styles of the bouquets we saved pictures of

PAT0067

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Do you?

Yes. I agree

Ok I'll start putting some stuff in there

Ok I added some bouquets that have peonies and hydrangeas. Take a look when you have time to see what you think.

I'm looking right now

K

I added some more on there. Let's do this. Why don't you like the ones you like and I can just delete the ones you don't. That way there's not a bunch in there. Pay attention to arrangement style even though you don't necessarily like the flower(s), colors (remember we can put what you want, and some of the details. You can comment like you were doing to say I don't like this about it but I really like this. Does that make



6:16



MR

Mireya >

do this. Why don't you like the ones you like and I can just delete the ones you don't. That way there's not a bunch in there. Pay attention to arrangement style even though you don't necessarily like the flower(s), colors (remember we can put what you want, and some of the details. You can comment like you were doing to say I don't like this about it but I really like this. Does that make sense?

But go through and like them first

Ok. Got it

I will have to do it tomorrow. Need to get ready for this walk. Her sister are here

Ok that's fine just let me know when you're done so I can go in there and delete stuff.

Have fun and be safe out there in this ugly heat

Ok. I will.
And Thank you.

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PAT0069

RA.1919



Hey Chickenbutt! So if I can arrange a cake tasting this weekend, would you be able to make it?

Hey friend.

Not really. I have CPR training all day Saturday and maybe family pictures on Sunday. For mom bday.

Ok I just wanted to check with you first before just arranging it.

Then I work next Saturday too

When is BC back in session?

I know you go back sooner though huh?

Let me get you a copy of my schedule

Ok

I'm thinking I might have to arrange during the week.



14 n 15 is ok

Ok I'll look into it on those days. I'll need to take some time off but that shouldn't be a problem

I have call back on Wednesday. Then I have a carpal tunnel procedure on Friday 18

Are you sure

Yes I'll just let my boss know what's

PAT0071

going on. She's pretty understanding.

Ok

I just want to get your cake squared away so you guys don't have to worry about it.

Make them the latest you can. That way you don't miss much

Thank you

What types of flavors do you guys like? Chocolate, vanilla, strawberry?

Others?



Just so I have an idea when I talk to bakeries

Give me a sec. I will check with Eileen

K just what you tend to like

Maybe a chocolate, lemon, vanilla

Oooo lemon 🍋

Lol. Too cute

Ok thank you Chickenbutt! I'll be in touch!

Ok. Sounds good

Aug 12, 2017, 6:55 PM

Hey my friend. I shared Pics on iCloud

Aug 12, 2017, 8:12 PM

Ok, I'll take a look at them tomorrow. I've been at my little cousins birthday. Did you get my invite for the cake tasting?



MR

Mireya

Ok. That's fine.
Yes I did. So we in for Tuesday

Yes I'm going to forward you some paperwork they sent to me to find out more about you. They want it for the tasting. Don't sign it though. I already arranged the flavors. I hope you'll like them.

Oh ok

Aug 13, 2017, 2:09 PM

Ok so I went through and deleted all of the pictures you didn't like. There's ones you didn't comment or like. So I didn't delete them because I wasn't sure. I can delete those too if the ones you commented on are the ones you really liked. Just let me know.

I'll go over them again and try to narrow them a lil more



PAT0074

Document received by the CA 5th District Court of Appeal.



Aug 13, 2017, 4:40 PM

Ok. I wrote delete on more pictures

Yes I seen. Deleting now. Thank you!

Ok. Thx

What did you think about the other bouquets I added

I didn't see anything posted from you

Hmm. Ok

That's weird bcuz you saw the cake topper

Let me take a look again



Document received by the CA 5th District Court of Appeal.

PAT0075



They were like 6 of this

I don't see them. Try adding again.

PAT0076

Aug 15, 2017, 12:46 PM

So are you thinking carnations,
hydrangeas, and baby's breath?

Yes

No roses?

Or a little bit?

Maybe

Or even roses, carnation and some
green. Maybe the baby breath



Aug 15, 2017, 12:46 PM

Ok leaving the office now. See you
in a few!

Im my car right outside

PAT0077

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Just got here

Aug 17, 2017, 4:45 PM

Do you maybe want to try this place too?

Sugar Twist Bakery | cakes
sugartwistbakery.com



We could check it out.

So this place they put it out there almost like a buffet kinda thing. And they don't charge

It's half the price of what the place we went to on Tuesday

She said they have mini cupcakes of different kinds and then the fillings in a line for us to put on the cupcake to taste



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To: Patrick Salazar, Mireya Rodriguez

Aug 17, 2017, 4:22 PM

Mireya Rodriguez

Hey guys. Do you want to sign up for cake tasting at Tastries?

What I meant to say is are you busy on aug 26 to sign up for cake tasting at tastries on Rosedale

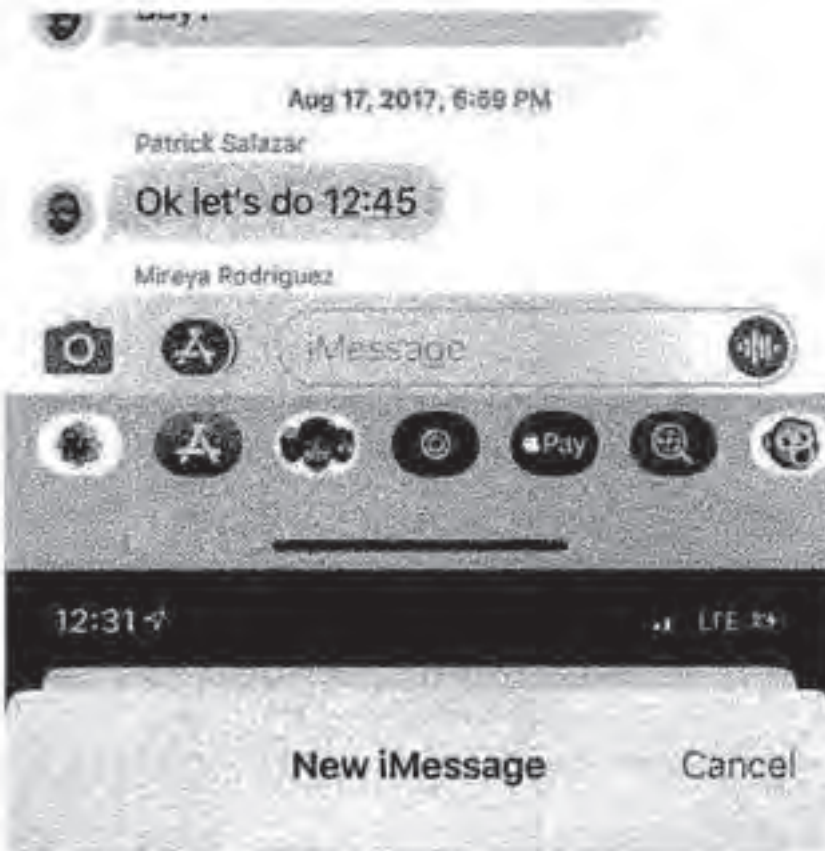
If yes sign up for 1pm or 1:15pm or 12:45 pm

Patrick Salazar

Sammy has a better idea of what's going on with our weekends. Do we have anything going on during the day?

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SAM0002



To: Patrick Salazar, Mireya Rodriguez

Ok let's do 12:45

Mireya Rodriguez

Ok. They are close now. But they had an email address on their website so I went ahead and put both your names and gave Patrick's cell #. They had told us that they would call us the day before to remind us.

Patrick Salazar

Ok sorry it took so long. This foolio couldn't remember what we had going on that day.

Mireya Rodriguez

Ok ok. So what happen

MR: It's ok. So what happen

Patrick Salazar

It's his cousins dad's birthday
and they're doing a celebration
dinner for him

Mireya Rodriguez

Oh but that's later in The day



To: Patrick Salazar, Mireya Rodriguez

dinner for him

Mireya Rodriguez

MR: Oh but that's later in The day.

Patrick Salazar

Yeah

Mireya Rodriguez

MR: So you could still make it. But
it's ok. No worries

Patrick Salazar

We'll be ok

Mireya Rodriguez

That's alright my friend.

MR We'll let you know

Patrick Salazar

Yes keep me updated 😊

Mireya Rodriguez

MR Of course



To: Patrick Salazar, Mireya Rodriguez

MR Of course

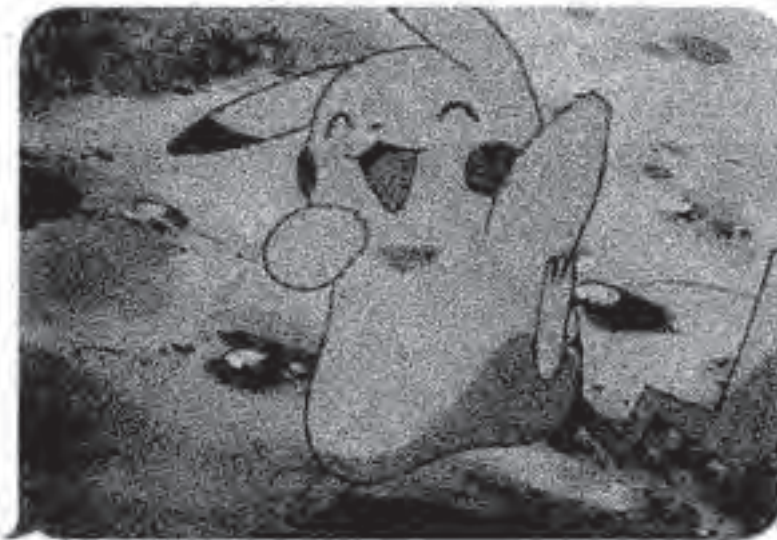


Document received by the CA 5th District Court of Appeal.

SAM0005



GIPHY via #images



GIPHY via #images

Aug 18, 2017, 7:57 PM

Hey friend. Did you get the invoice from the cake place

No I haven't received anything

Oh ok

Aug 22, 2017, 6:27 PM

Did you hear back about the cake tasting for this Saturday?

PAT0080

I did. But I thought you guys
couldn't make it.

Don't tell me that I misunderstood?



Aug 22, 2017, 6:27 PM

Did you hear back about the cake
tasting for this Saturday?

I did. But I thought you guys
couldn't make it.

Don't tell me that I misunderstood?

Lol yes we can make it. The dinner
isn't until the evening. The one at
12:15 or whatever it was is the
better one for us. Sorry for the
miscommunication.

Lol. Ok. That's what I think I said

PAT0081

Document received by the CA 5th District Court of Appeal.

that day but I don't remember if you corrected me then or not. Ok. Let me see

Aug 23, 2017, 8:30 PM

Hey friend. So they said that they will put you down for 12:15

Ok sounds good. Are you going to be there too?

Yes



Ok, which bakery is it again?

Tastries. Next to Johns incredible pizza

Ok sounds good! We'll see you on Saturday! 🍕

PAT0082

Document received by the CA 5th District Court of Appeal.

Sent from my iPhone

Begin forwarded message:

From: Eileen Del Rio <casper8me69@aol.com>

Date: August 15, 2016 at 2:35:04 PM PDT

To: don martin <metrogalleries@yahoo.com>

Subject: Re: Metro Galleries- October 2017

How about Wednesday at 4:45pm. My fiancé will be coming from Bakersfield College so that would give her a 15 min window to get over to your facility. I can have my mother meet her and they can go over most of everything with me on the phone with them using face time. I usually am working out of town during the week but am willing to figure this all out to secure our date for the wedding.

Sent from my iPhone

On Aug 15, 2016, at 2:21 PM, don martin <metrogalleries@yahoo.com> wrote:

We are unable to Friday - Sunday's as the gallery is always booked. The only days we can after 4:30 this week are tomorrow and Wednesday. We are booked with a party on Thursday evening as well.

Don Martin
Metro Galleries . Metro Special
MetroMedia . Bakersfield Arts District Foundation
Sent from my iPhone

On Monday, August 15, 2016, 2:04 PM, Eileen Del Rio
<casper8me69@aol.com> wrote:

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Hi Don

Thank you.

What do you have available for Friday? My fiancé works until 4:30pm so I am not sure if you have late showings. Wanted to gather info to let her know. I also work out of town and come in on Fridays.

Eileen Del Rio

Sent from my iPhone

On Aug 15, 2016, at 12:39 PM, don martin
<metrogalleries@yahoo.com> wrote:

Good Afternoon Eileen,
I have attached some photos and our 6
hour package. It is priced at \$2200, but
I have a \$400 off special running now
and another \$100 off for booking a 2017
event. The total would be \$1700 with
free set up and clean up by my staff
included. Please let me know if you
have any questions. We do have
appointments available this week and
would be happy to show you the gallery.

Best,
Don

Don Martin

Owner/Creative Director

**Metro Galleries . Metro Special
Events . Metro Media**

creating . innovating . celebrating

Twitter: [Metrodonmartin](#)

Facebook: [Don.Martin2](#)

Instagram: [MetroDonMartin](#)

YouTube Channel: [MetroGalleries1](#)

The Arts District

1604 19th Street

Bakersfield, CA 93301

Document received by the CA 5th District Court of Appeal.

On Sunday, August 14, 2016 2:50 PM,
don martin
<metrogalleries@yahoo.com> wrote:

Hi Eileen,
I'm just heading back to Bakersfield from
the coast. I'll get you info as soon as I
get home.

D

Don Martin
Metro Galleries . Metro Special
MetroMedia . Bakersfield Arts District
Foundation
Sent from my iPhone

On Sunday, August 14, 2016, 2:41 PM,
Eileen Del Rio <casper8me69@aol.com>
wrote:

Hi Don

About 140 people for a
wedding.

Thank you

Eileen Del Rio

Sent from my iPhone

On Aug 14, 2016, at 1:19
PM, don martin
<metrogalleries@yahoo.com>
wrote:

Good afternoon
Eillen,
Please let me
know what type
of event and
approximate
guest count and I

Document received by the CA 5th District Court of Appeal.

will get you info
asap.

Best,
Don

Don Martin
*Owner/Creative
Director*
**Metro Galleries .
Metro Special
Events . Metro
Media**
creating .
innovating .
celebrating

Twitter:
[Metrodonmartin](#)
Facebook:
[Don.Martin2](#)
Instagram:
[MetroDonMartin](#)
YouTube Channel:
[MetroGalleries1](#)

The Arts District
1604 19th Street
Bakersfield, CA
93301

<Metro6Hour2016.jpg>

<MetroMap.jpg>

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<0metro3.jpg>

<0metro4.jpg>

<0metro5.jpg>

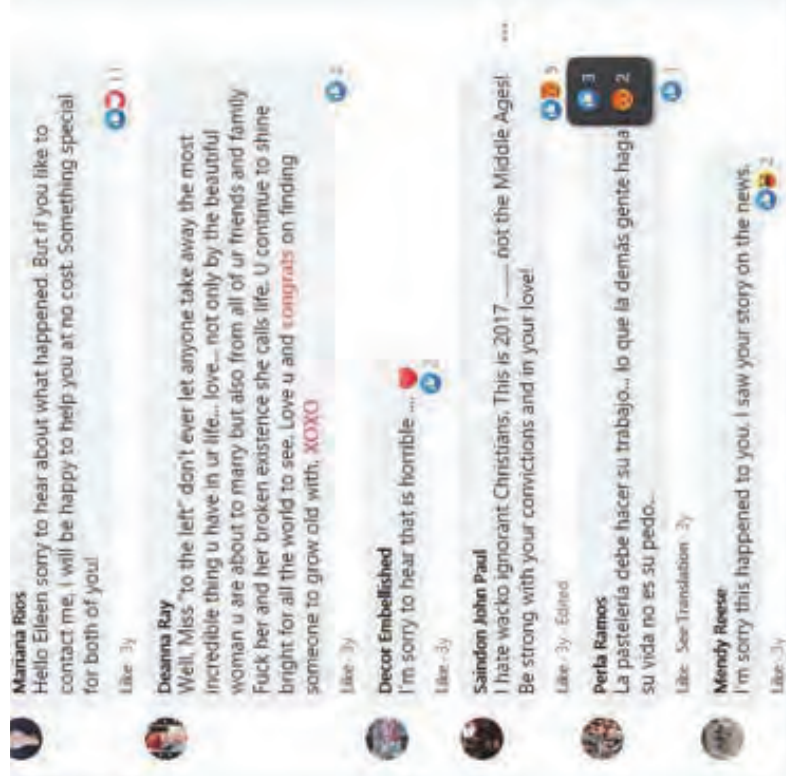
<0metro9.jpg>

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RA.1941





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*Application forthcoming

*Attorneys for Defendants Cathy's Creations,
Inc. and Catharine Miller*

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF KERN**

DEPARTMENT OF FAIR EMPLOYMENT
AND HOUSING, an agency of the State of
California,

Plaintiff;

v.

CATHY'S CREATIONS, INC. dba
TASTRIES, a California Corporation; and
CATHARINE MILLER, an individual,

Defendants.

EILEEN RODRIGUEZ-DEL RIO and
MIREYA RODRIGUEZ-DEL RIO,

Real Parties in Interest.

CASE NO.: BCV-18-102633

**Defendant Catharine Miller's
Objections & Responses to Requests
for Admission**

[Set One]

Action Filed: October 17, 2018
Trial Call: July 25, 2022

1 PROPOUNDING PARTIES: Plaintiff DEPARTMENT OF FAIR EMPLOYMENT
2 AND HOUSING
3 RESPONDING PARTIES: Defendant CATHARINE MILLER
4 SET NO.: ONE [Nos. 1-32]
5

6 Pursuant to Section 2033.210 of the California Code of Civil Procedure, Defendant Catharine
7 Miller responds and objects to Plaintiff Department of Fair Employment and Housing's ("DFEH")
8 First Set of Requests for Admission.
9

10 GENERAL OBJECTIONS

11 1. Miller objects to each request insofar as it seeks information (1) not in Miller's
12 possession, custody, or control; (2) prepared for or in anticipation of litigation, protected by the
13 attorney-client privilege, contains work product, or is otherwise privileged; (3) publicly available or
14 otherwise equally available to the DFEH or equally available from third parties; (4) that does not
15 specifically refer to the events forming the subject matter of this litigation; (5) not relevant to the
16 subject matter of this litigation nor reasonably calculated to lead to the discovery of admissible
17 evidence; and (6) that imposes any requirement or obligation beyond the scope of permissible
18 discovery.

19 2. These responses and objections are made on the basis of information now known to
20 Miller and are made without waiving any further objections to, or admitting the relevancy or
21 materiality of, any of the information requested. Miller's investigation, discovery, and preparation
22 for proceedings are continuing and all answers are given without prejudice to its right to introduce or
23 object to any subsequently discovered documents, facts, or information. Miller likewise does not
24 waive the right to object, on any and all grounds, to (1) the evidentiary use of the information
25 contained in these responses and objections and (2) discovery requests relating to these objections
26 and responses.

27 3. Miller will provide its responses based on terms as they are commonly understood
28 and consistent with the California Code of Civil Procedure. Miller objects to and will refrain from

1 extending or modifying any words employed in the requests to comport with expanded definitions or
2 instructions.

3 4. Miller objects to the requests to the extent that they seek trade secrets protected by
4 Section 1060 of the California Evidence Code. Miller will only provide information protected by
5 Section 1060 under the terms of an adequate protective order binding on the parties or under
6 equivalent safeguards.

7 Subject to and without waiving the foregoing objections, Miller responds as follows:
8

9 **OBJECTIONS & RESPONSES TO REQUESTS FOR ADMISSION**

10 **REQUEST FOR ADMISSION NO. 1:**

11 Admit that YOUR religion does not require you to operate a bakery.

12 **Response:** Defendant objects that the request is vague and ambiguous. Defendant's faith
13 places value in work and in sharing one's creative talents with the world. Defendant's faith teaches
14 that by working, one can grow closer to God and temper one's soul through labor done in love.
15 Defendant's faith also requires that she share her talents with the world, and to share what she is best
16 at for the betterment of all those around her. Negatively, Defendant's faith also requires that she
17 make a living, and not unnecessarily burden society through not working to support herself. Thus,
18 although no aspect of Defendant's faith states that all Christians must operate a bakery that
19 specializes in wedding cakes, in a true sense, God has called her to operate such a bakery.

20 Subject to the foregoing objections, and without waiving them, Defendant responds as
21 follows: **Denied.**
22

23 **REQUEST FOR ADMISSION NO. 2:**

24 Admit that TASTRIES' policy as expressed in its Design Standards regarding selling custom
25 cakes to be used in same-sex marriage celebrations is based on YOUR religious beliefs only.

26 **Response:** Defendant objects to the request on the basis that it assumes an incorrect
27 interpretation of the Design Standards. There is nothing in the Design Standards "regarding selling
28 custom cakes to be used in same-sex marriage celebrations." The Design Standards instead solely

1 concern "fundamental Christian principles" and "God's sacrament of marriage between a man and
2 a woman."

3 Defendant further objects on the basis that the request for admission is vague and ambiguous
4 in that "YOUR" is not a defined term, but "YOU" is defined as including all of Defendant Miller's
5 "agents, employees, board of directors, officers, partners, managers, members, supervisors, and any
6 other persons acting on YOUR behalf," but this request, as phrased, seems to not include that
7 definition. Further, it is unclear whether this request is intended to distinguish between Tastries'
8 religious beliefs or solely to distinguish between the religious beliefs of specific individuals. This is
9 relevant because Tastries' is a legal "person" whose religious beliefs mirror Defendant Miller's
10 religious beliefs. (See *Burwell v. Hobby Lobby Stores, Inc.* (2014) 573 U.S. 682, 708.)

11 Subject to the foregoing objections, and without waiving them, Defendant responds as
12 follows: **Denied.**

13
14 **REQUEST FOR ADMISSION NO. 3:**

15 Admit that people who are not heterosexual enter into same-sex marriages.

16 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
17 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
18 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, and
19 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
20 or duplicative and therefore doubles the burden on Miller to respond to these requests.
21 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
22 standards of proper discovery.

23 Defendant objects that the request is vague and ambiguous and may imply that people who
24 are not heterosexual *only* enter into same-sex marriages and never enter into opposite-sex marriages.
25 Further, the request is vague and ambiguous as to "marriage" as some it may refer solely to legal
26 marriage, or may refer to same-sex marital unions entered into in States before same-sex marriage
27 was legal, or marital unions between three or more individuals that are not currently recognized by
28 any state.

1 Subject to the foregoing objections, and without waiving them, Defendant responds as
2 follows: Defendant responds that it **lacks sufficient information or knowledge** to admit or deny this
3 request.

4
5 **REQUEST FOR ADMISSION NO. 4:**

6 Admit that people who are heterosexual do not enter into same-sex marriages.

7 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
8 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
9 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
10 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
11 or duplicative and therefore doubles the burden on Miller to respond to these requests.
12 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
13 standards of proper discovery.

14 Defendant objects that the request is vague and ambiguous and may imply that people who
15 are heterosexual *never* enter into same-sex marriages and only enter into opposite-sex marriages.
16 Further, the request is vague and ambiguous as to "marriage" as some it may refer solely to legal
17 marriage, or may refer to same-sex marital unions entered into in States before same-sex marriage
18 was legal, or marital unions between three or more individuals that are not currently recognized by
19 any state.

20 Subject to the foregoing objections, and without waiving them, Defendant responds as
21 follows: Defendant responds that it **lacks sufficient information or knowledge** to admit or deny this
22 request.

23
24 **REQUEST FOR ADMISSION NO. 5:**

25 Admit that TASTRIES did not attempt to refer the RODRIGUEZ DEL-RIOS to another
26 bakery until after it learned they were a same-sex couple.

27 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
28 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is

1 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
2 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
3 or duplicative and therefore doubles the burden on Miller to respond to these requests.
4 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
5 standards of proper discovery.

6 Defendant objects that the request is vague and ambiguous and may imply sort of causation
7 between Defendant learning that the Real Parties were a same-sex couple and Defendant's offer to
8 connect them with another bakery. Defendant further objects that the term "referral" assumes an
9 incorrect interpretation of the facts. Defendant did not merely offer a "referral," but offered to
10 connect the Real Parties with the other bakery. Defendant attempted to connect the Real Parties with
11 another bakery that could provide them with a wedding cake for their same-sex wedding upon
12 discovering that Real Parties were seeking to commission Defendant to create a custom wedding cake
13 sending a message of celebration in violation of Defendant's neutral Design Standards regarding
14 covenantal marriage between one man and one woman.

15 Subject to the foregoing objections, and without waiving them, Defendant responds as
16 follows: To the extent that this request solely concerns the location of events in time, and not
17 causation: **Admitted.**

18
19 **REQUEST FOR ADMISSION NO. 6:**

20 Admit that if an opposite-sex couple sought to order custom cakes for use in the celebration
21 of their wedding that were identical to those sought from TASTRIES by the RODRIGUEZ-DE
22 RIOS, YOU would have taken and attempted to fulfill the order.

23 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
24 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
25 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
26 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
27 or duplicative and therefore doubles the burden on Miller to respond to these requests.
28

1 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
2 standards of proper discovery.

3 Defendant objects to the request on the basis that it assumes an incorrect interpretation of
4 Tastries' process of accepting commissions for custom-designed baked goods. No two custom-
5 designed cake commissions are identical. There are numerous factors that go into whether Defendant
6 chooses to accept a cake order.

7 Subject to the foregoing objections, and without waiving them, Defendant responds as
8 follows; Defendant responds that it **lacks sufficient information or knowledge** to admit or deny this
9 request.

10
11 **REQUEST FOR ADMISSION NO. 7:**

12 Admit that TASTRIES selling custom cakes is not a religious practice.

13 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
14 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
15 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, and
16 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
17 or duplicative and therefore doubles the burden on Miller to respond to these requests.
18 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
19 standards of proper discovery.

20 Defendant objects that the request is vague and ambiguous. Defendant's faith places value in
21 work and in sharing one's creative talents with the world. Defendant's faith teaches that by working
22 one can grow closer to God and temper one's soul through labor done in love. Defendant's faith also
23 requires that she share her talents with the world, and to share what she is best at for the betterment
24 of all those around her. Negatively, Defendant's faith also requires that she make a living, and not
25 unnecessarily burden society through not working to support herself. Thus, although no aspect of
26 Defendant's faith states that all Christians must operate a bakery that specializes in wedding cakes
27 in a true sense, God has called her to operate such a baker.

28 ///

1 Subject to the foregoing objections, and without waiving them, Defendant responds as
2 follows: **Denied.**

3
4 **REQUEST FOR ADMISSION NO. 8:**

5 Admit that YOUR religion does not require you to sell wedding cakes.

6 **Response:** Defendant objects that the request is vague and ambiguous. Defendant's faith
7 places value in work and in sharing one's creative talents with the world. Defendant's faith teaches
8 that by working, one can grow closer to God and temper one's soul through labor done in love.
9 Defendant's faith also requires that she share her talents with the world, and to share what she is best
10 at for the betterment of all those around her. Negatively, Defendant's faith also requires that she
11 make a living, and not unnecessarily burden society through not working to support herself. Thus,
12 although no aspect of Defendant's faith states that all Christians must operate a bakery that
13 specializes in wedding cakes, in a true sense, God has called her to operate such a baker.

14 Subject to the foregoing objections, and without waiving them, Defendant responds as
15 follows: **Denied.**

16
17 **REQUEST FOR ADMISSION NO. 9:**

18 Admit there is a legal distinction between YOU and TASTRIES.

19 **Response: Admitted.**

20
21 **REQUEST FOR ADMISSION NO. 10:**

22 Admit that TASTRIES has employees who have no religious objection to participating in the
23 design and creation of custom cakes for use in same-sex wedding celebrations.

24 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
25 Requests for Admission to 'Tastries Bakery'. As made clear since the beginning of this case, Miller is
26 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
27 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
28 or duplicative and therefore doubles the burden on Miller to respond to these requests.

1 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
2 standards of proper discovery.

3 Defendant objects on the basis that the term "religious objection" is vague and ambiguous,
4 and may or may not call for a legal conclusion. Defendant further objects on the basis of third-party
5 privacy: Defendant does not poll its employees on their religious beliefs, which are not relevant to
6 this action. (*Guthrey v. California Dept. of Corrections and Rehabilitation* (E.D. Cal, 2012) 2012 WL
7 2499938.)

8 Subject to the foregoing objections, and without waiving them, Defendant responds as
9 follows: Defendant **lacks sufficient information or knowledge** to admit or deny this request.
10 However, Defendant admits that in her deposition, Taylor Arbolante stated words to the effect that
11 she would feel comfortable making a wedding cake for a same-sex couple, without clearly explaining
12 whether this was in light of, or in spite of, her views on same-sex marriage, and what may influence
13 those views.

14
15 **REQUEST FOR ADMISSION NO. 11:**

16 Admit that when the RODRIGUEZ-DEL RIOS attempted to order cakes from TASTRIES
17 for use in the celebration of their wedding, TASTRIES had employees who had no religious objection
18 to participating in the design and creation of custom cakes for use in same-sex wedding celebrations.

19 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
20 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
21 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
22 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
23 or duplicative and therefore doubles the burden on Miller to respond to these requests.
24 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
25 standards of proper discovery.

26 Defendant objects on the basis that the term "religious objection" is vague and ambiguous
27 and may or may not call for a legal conclusion. Defendant further objects on the basis of third-party
28 privacy: Defendant does not poll its employees on their religious beliefs, which are not relevant to

1 this action. (*Guthrey v. California Dept. of Corrections and Rehabilitation* (E.D. Cal. 2012) 2012 WL
2 2499938.)

3 Subject to the foregoing objections, and without waiving them, Defendant responds as
4 follows: Defendant **lacks sufficient information or knowledge** to admit or deny this request.
5 However, Defendant admits that in her deposition, Taylor Arbolante stated words to the effect that
6 she would feel comfortable making a wedding cake for a same-sex couple, without clearly explaining
7 whether this was in light of, or in spite of, her views on same-sex marriage, and what may influence
8 those views.

9
10 **REQUEST FOR ADMISSION NO. 12:**

11 Admit that TASTRIES could have fulfilled the order for the cakes the RODRIGUEZ-DEL
12 RIOS wanted to order for use in the celebration of their marriage without the personal participation
13 of YOU.

14 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
15 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
16 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
17 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
18 or duplicative and therefore doubles the burden on Miller to respond to these requests.
19 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
20 standards of proper discovery.

21 Defendant objects on the basis that the term "personal participation" is vague and ambiguous
22 because the vast majority of Defendant's custom-design services involve Cathy Miller's personal
23 participation, and at the very least, all of them derive from prior design services in which Miller
24 personally participated.

25 Subject to the foregoing objections, and without waiving them, Defendant responds as
26 follows: **Denied.**

27 ///

28 ///

1 **REQUEST FOR ADMISSION NO. 13:**

2 Admit that in 2017 YOU did not personally participate in the design and creation of every
3 custom cake TASTRIES sold.

4 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
5 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
6 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
7 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
8 or duplicative and therefore doubles the burden on Miller to respond to these requests.
9 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
10 standards of proper discovery.

11 Defendant objects on the basis that the term "personally participate" is vague and ambiguous
12 because the vast majority of Defendant's custom-design services involve Cathy Miller's personal
13 participation, and at the very least, all of them derive from prior design services in which Miller
14 personally participated.

15 Subject to the foregoing objections, and without waiving them, Defendant responds as
16 follows: **Denied.**

17
18 **REQUEST FOR ADMISSION NO. 14:**

19 Admit that YOU do not know the purpose for which every custom cake TASTRIES sells
20 being used.

21 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
22 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
23 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
24 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
25 or duplicative and therefore doubles the burden on Miller to respond to these requests.
26 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
27 standards of proper discovery.

28 Defendant objects on the basis that the term "know the purpose" is vague and ambiguous.

1 Defendant's collaborative process of creating custom designed baked goods involves inquiring of the
2 purpose of every custom order so that the design can be properly tailored. But, of course, a client
3 could intentionally seek to mislead Defendant. Defendant interprets this request as not concerning
4 the situation of an intentional misleading of Defendant.

5 Subject to the foregoing objections, and without waiving them, Defendant responds as
6 follows: **Denied.**

7
8 **REQUEST FOR ADMISSION NO. 15:**

9 Admit that YOU cannot guarantee that potential customers YOU refer to another bakery for
10 a custom cake will actually be able to obtain a cake that is the same as the cake TASTIRES [sic] would
11 create based on the same order.

12 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
13 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
14 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
15 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
16 or duplicative and therefore doubles the burden on Miller to respond to these requests.
17 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
18 standards of proper discovery.

19 Defendant objects to the request on the basis that it assumes an incorrect interpretation of
20 Defendant's collaborative process with potential clients. Defendant does not take an "order," but
21 engages in a collaborative artistic process with each client to custom-design a unique product.
22 Further, the goal of Defendant connecting clients with other bakeries is not to obtain the "same"
23 wedding cake, but sometimes a better cake that will better suit their needs, or—at the very least—
24 a cake that will suit their needs.

25 Subject to the foregoing objections, and without waiving them, Defendant responds as
26 follows: **Admitted.**

27 ///

28 ///

1 **REQUEST FOR ADMISSION NO. 16:**

2 Admit that TASTRIES' sale of custom cakes to be used as part of an event does not send a
3 message of endorsement in support of every event for which TASTRIES sell custom cakes.

4 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
5 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
6 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
7 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
8 or duplicative and therefore doubles the burden on Miller to respond to these requests.
9 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
10 standards of proper discovery.

11 Defendant objects on the basis that the term "endorsement" is vague and ambiguous.
12 Merriam-Webster's Dictionary describes "endorse" as defined as "to recommend," "to approve
13 openly," or "to express support or approval of publicly and definitely." Thus, certain members of
14 the public with closer knowledge of Defendant's operations will know that it only creates cakes that
15 do not send messages contradicting "fundamental Christian principles."

16 Subject to the foregoing objections, and without waiving them, Defendant responds as
17 follows: **Denied.**

18
19 **REQUEST FOR ADMISSION NO. 17:**

20 Admit that YOU have no evidence to support the third affirmative defense asserted in YOUR
21 ANSWER.

22 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
23 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
24 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
25 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
26 or duplicative and therefore doubles the burden on Miller to respond to these requests.
27 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
28 standards of proper discovery.

1 Defendant objects on the basis that the request for admission is not "full and complete in and
2 of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete in and
3 of itself' when resort must necessarily be made to other materials in order to complete the question."
4 (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to
5 the third affirmative defense (unclean hands).

6 Subject to the foregoing objections, and without waiving them, Defendant responds as
7 follows: **Denied.**

8
9 **REQUEST FOR ADMISSION NO. 18:**

10 Admit that YOU have no evidence to support the fourth affirmative defense asserted in
11 YOUR ANSWER.

12 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
13 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
14 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
15 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
16 or duplicative and therefore doubles the burden on Miller to respond to these requests.
17 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
18 standards of proper discovery.

19 Defendant objects on the basis that the request for admission is not "full and complete in and
20 of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete in and
21 of itself' when resort must necessarily be made to other materials in order to complete the question."
22 (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to
23 the fourth affirmative defense (abuse of process).

24 Subject to the foregoing objections, and without waiving them, Defendant responds as
25 follows: **Denied.**

26 ///

27 ///

28 ///

1 **REQUEST FOR ADMISSION NO. 19:**

2 Admit that YOU have no evidence to support the fifth affirmative defense asserted in YOUR
3 answer.

4 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
5 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
6 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
7 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
8 or duplicative and therefore doubles the burden on Miller to respond to these requests.
9 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
10 standards of proper discovery.

11 Defendant objects on the basis that the request for admission is not "full and complete in and
12 of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete in and
13 of itself' when resort must necessarily be made to other materials in order to complete the question."
14 (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to
15 the fifth affirmative defense (fraudulent intent to gain access).

16 Subject to the foregoing objections, and without waiving them, Defendant responds as
17 follows: **Denied.**

18
19 **REQUEST FOR ADMISSION NO. 20:**

20 Admit that YOU have no evidence to support the sixth affirmative defense asserted in YOUR
21 answer.

22 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
23 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
24 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
25 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
26 or duplicative and therefore doubles the burden on Miller to respond to these requests.
27 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
28 standards of proper discovery.

1 Defendant objects on the basis that the request for admission is not "full and complete in and
2 of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete in and
3 of itself' when resort must necessarily be made to other materials in order to complete the question."
4 (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to
5 the sixth affirmative defense (justification).

6 Subject to the foregoing objections, and without waiving them, Defendant responds as
7 follows: **Denied.**

8
9 **REQUEST FOR ADMISSION NO. 21:**

10 Admit that YOU have no evidence to support the seventh affirmative defense asserted in
11 YOUR answer.

12 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
13 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
14 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
15 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
16 or duplicative and therefore doubles the burden on Miller to respond to these requests.
17 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
18 standards of proper discovery.

19 Defendant objects on the basis that the request for admission is not "full and complete in and
20 of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete in and
21 of itself' when resort must necessarily be made to other materials in order to complete the question."
22 (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to
23 the seventh affirmative defense (estoppel).

24 Subject to the foregoing objections, and without waiving them, Defendant responds as
25 follows: **Denied.**

26 ///

27 ///

28 ///

1 **REQUEST FOR ADMISSION NO. 22:**

2 Admit that YOU have no evidence to support the eighth affirmative defense asserted in
3 YOUR answer.

4 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
5 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
6 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
7 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
8 or duplicative and therefore doubles the burden on Miller to respond to these requests.
9 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
10 standards of proper discovery.

11 Defendant objects on the basis that the request for admission is not "full and complete in and
12 of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete in and
13 of itself' when resort must necessarily be made to other materials in order to complete the question.
14 (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to
15 the eighth affirmative defense (no injury).

16 Subject to the foregoing objections, and without waiving them, Defendant responds as
17 follows: **Denied.**

18
19 **REQUEST FOR ADMISSION NO. 23:**

20 Admit that YOU have no evidence to support the eleventh affirmative defense asserted in
21 YOUR answer.

22 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
23 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
24 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
25 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
26 or duplicative and therefore doubles the burden on Miller to respond to these requests.
27 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
28 standards of proper discovery.

1 Defendant objects on the basis that the request for admission is not "full and complete in and
2 of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete in and
3 of itself' when resort must necessarily be made to other materials in order to complete the question."
4 (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to
5 the eleventh affirmative defense (California Free Exercise).

6 Subject to the foregoing objections, and without waiving them, Defendant responds as
7 follows: **Denied.**

8
9 **REQUEST FOR ADMISSION NO. 24:**

10 Admit that YOU have no evidence to support the twelfth affirmative defense asserted in
11 YOUR answer.

12 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
13 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
14 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
15 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
16 or duplicative and therefore doubles the burden on Miller to respond to these requests.
17 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
18 standards of proper discovery.

19 Defendant objects on the basis that the request for admission is not "full and complete in and
20 of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete in and
21 of itself' when resort must necessarily be made to other materials in order to complete the question"
22 (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to
23 the twelfth affirmative defense (Federal Free Exercise).

24 Subject to the foregoing objections, and without waiving them, Defendant responds as
25 follows: **Denied.**

26 ///

27 ///

28 ///

1 **REQUEST FOR ADMISSION NO. 25:**

2 Admit that YOU have no evidence to support the thirteenth affirmative defense asserted in
3 YOUR answer.

4 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
5 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
6 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
7 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
8 or duplicative and therefore doubles the burden on Miller to respond to these requests.
9 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
10 standards of proper discovery.

11 Defendant objects on the basis that the request for admission is not "full and complete in and
12 of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete in and
13 of itself' when resort must necessarily be made to other materials in order to complete the question."
14 (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to
15 the thirteenth affirmative defense (Free Speech).

16 Subject to the foregoing objections, and without waiving them, Defendant responds as
17 follows: **Denied.**

18
19 **REQUEST FOR ADMISSION NO. 26:**

20 Admit that YOU have no evidence to support the fourteenth affirmative defense asserted in
21 YOUR answer.

22 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
23 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
24 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
25 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
26 or duplicative and therefore doubles the burden on Miller to respond to these requests.
27 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
28 standards of proper discovery.

1 Defendant objects on the basis that the request for admission is not "full and complete in and
2 of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete in and
3 of itself' when resort must necessarily be made to other materials in order to complete the question."
4 (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to
5 the fourteenth affirmative defense (Due Process).

6 Subject to the foregoing objections, and without waiving them, Defendant responds as
7 follows: **Denied.**

8
9 **REQUEST FOR ADMISSION NO. 27:**

10 Admit that YOU have no evidence to support the fifteenth affirmative defense asserted in
11 YOUR answer.

12 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
13 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
14 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
15 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
16 or duplicative and therefore doubles the burden on Miller to respond to these requests.
17 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
18 standards of proper discovery.

19 Defendant objects on the basis that the request for admission is not "full and complete in and
20 of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete in and
21 of itself' when resort must necessarily be made to other materials in order to complete the question."
22 (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to
23 the fifteenth affirmative defense (Equal Protection).

24 Subject to the foregoing objections, and without waiving them, Defendant responds as
25 follows: **Denied.**

26 ///

27 ///

28 ///

1 **REQUEST FOR ADMISSION NO. 28:**

2 Admit that the RODRIGUEZ-DEL RIOS attempted to place an order for cakes for use in the
3 celebration of their marriage, not as part of a plan to seek a lawsuit against YOU.

4 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
5 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
6 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
7 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
8 or duplicative and therefore doubles the burden on Miller to respond to these requests.
9 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
10 standards of proper discovery.

11 **Response:** Defendant lacks sufficient information to admit or deny this request.
12

13 **REQUEST FOR ADMISSION NO. 29:**

14 Admit that 'TASTRIES' business operations are not officially affiliated with any religious
15 organization.

16 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
17 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
18 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
19 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
20 or duplicative and therefore doubles the burden on Miller to respond to these requests.
21 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
22 standards of proper discovery.

23 **Response: Admitted.**
24

25 **REQUEST FOR ADMISSION NO. 30:**

26 Admit that TASTRIES was not incorporated as a religious entity.

27 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
28 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is

1 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
2 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
3 or duplicative and therefore doubles the burden on Miller to respond to these requests.
4 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
5 standards of proper discovery.

6 **Response: Admitted.**

7
8 **REQUEST FOR ADMISSION NO. 31:**

9 Admit that white or off-white, round, three-tiered cakes with buttercream frosting and no
10 written message can be used as part of events other than weddings.

11 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
12 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is
13 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
14 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
15 or duplicative and therefore doubles the burden on Miller to respond to these requests.
16 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
17 standards of proper discovery.

18 Defendant objects on the basis that the request for admission is vague and ambiguous as to
19 "can be used" and as to "white or off-white, round, three-tiered cakes with buttercream frosting and
20 no written message."

21 Subject to the foregoing objections, and without waiving them, Defendant responds as
22 follows: **Admitted.**

23
24 **REQUEST FOR ADMISSION NO. 32:**

25 Admit that TASTRIES has sold white or off-white, round, three-tiered cakes with
26 buttercream frosting and no written message for use as part of events other than weddings.

27 **Response:** Defendant objects to this request as duplicative of the DFEH's First Set of
28 Requests for Admission to Tastries Bakery. As made clear since the beginning of this case, Miller is

1 100% shareholder of Tastries Bakery and solely responsible for its existence and operation. Thus, any
2 same or similar discovery demands on both Tastries Bakery and Miller are oppressively cumulative
3 or duplicative and therefore doubles the burden on Miller to respond to these requests.
4 Consequently, Miller objects to this request because it is unduly burdensome and contrary to the
5 standards of proper discovery.

6 Defendant objects on the basis that the request for admission is vague and ambiguous as to
7 "for use as" and as to "white or off-white, round, three-tiered cakes with buttercream frosting and
8 no written message."

9 Subject to the foregoing objections, and without waiving them, Defendant responds as
10 follows: **Admitted.**

11
12
13
14 Dated: February 24, 2022

LiMANDRI & JONNA LLP

By: _____

Charles S. LiMandri

Paul M. Jonna

Jeffrey M. Trissell

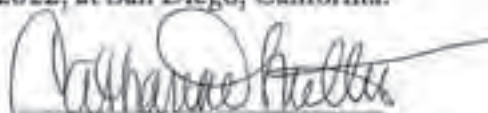
Milan L. Brandon II

Attorneys for Defendants

VERIFICATION

I, Catharine Miller, am a defendant in this action. I have read the document, **Defendant Catharine Miller's Objections & Responses to Requests for Admission [Set One]** and know its contents. The information supplied in the foregoing document is based on my own personal knowledge or has been supplied by my attorneys or other agents or compiled from available documents and is provided as required by law. The information in the foregoing document is true to the extent of my personal knowledge. As to the information provided by my attorneys or other agents or compiled from available documents, including all contentions and opinions, I do not have personal knowledge but made a reasonable and good faith effort to obtain the information by inquiry to other natural persons or organizations, except where the information is equally available to the propounding party. Thus, I am informed and believe that the matters stated in the foregoing document are true and on that ground certify or declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed this 24th day of February 2022, at San Diego, California.


Catharine Miller

COURT OF THE STATE OF CALIFORNIA KERN COUNTY SUPERIOR COURT – METROPOLITAN DIVISION		FOR COURT USE ONLY
TITLE OF CASE (Abbreviated) Dept. of Fair Employment & Housing v. Cathy's Creations, Inc. dba Tastries		
ATTORNEY(S) NAME AND ADDRESS Charles S. LiMandri, SBN 110841 Paul M. Jonna, SBN 265389 FREEDOM OF CONSCIENCE DEFENSE FUND P.O. Box 9520 Rancho Santa Fe, California 92067 Tele: (858) 759-9948; Fax: (858) 759-9938		
ATTORNEY(S) FOR: Defendants CATHY'S CREATIONS, INC. d/b/a TASTRIES, a California Corporation; and CATHY MILLER, an individual	HEARING Dept. (1)	CASE NO.: BCV-18-102633 JUDGE: Hon. J. Eric Bradshaw

CERTIFICATE OF SERVICE

I, Kathy Denworth, declare that: I am over the age of 18 years and not a party to the action; I am employed in, or am a resident of the County of San Diego, California; where the mailing occurs; and my business address is P.O. Box 9520, Rancho Santa Fe, CA 92067, Telephone number (858) 759-9948; Facsimile number (858) 759-9938. I further declare that I served the following document(s) on the parties in this action:

- * Defendant Catharine Miller's First Amended Responses to Special Interrogatories [Set One];
- * Defendant Catharine Miller's Objections & Responses to Requests for Admission [Set One];
- * Defendant Catharine Miller's Responses to Special Interrogatories [Set Two];
- * Defendant Catharine Miller's Objections & Responses to Requests for Production of Documents [Set Two];
- * Defendant Catharine Miller's Objections & Responses to Form Interrogatories [Set Two];
- * Defendant Catharine Miller's Objections & Responses to Form Interrogatories [Supplemental]; and
- * Defendant Catharine Miller's Objections & Responses to Requests for Production of Documents [Supplemental].

by one or more of the following methods of service to:

Janette Wipper, Chief Counsel
Paula D. Pearlman, Asst. Chief Counsel
Gregory J. Mann - Sr. Staff Counsel
Timothy Martin, Staff Counsel
Tiffany Tejada, Staff Counsel
Soyeon Mesinas, Staff Counsel
Department of Fair Employment and Housing
320 4th Street, Suite 1000
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Tel: (213) 439-6799; Fax: (888) 382-5293
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E-Mail: Soyeon.Mesinas@dfeh.ca.gov
Attorneys for Plaintiff Department of Fair
Employment and Housing

- ☒ **(BY U.S. MAIL)** I caused such document(s) to be sealed in envelopes, and with the correct postage thereon fully prepaid, either deposited in the United States Postal Service or placed for collection and mailing following ordinary business practices.
- ☒ **(BY E-MAIL/ELECTRONIC MAIL)** I caused a copy of the foregoing document(s) to be sent to the persons at the e-mail addresses listed above, this date via internet/electronic mail.
- ☐ **(BY ELECTRONIC FILING/SERVICE)** I caused such document(s) to be Electronically Filed and/or Service through the One Legal System.

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

Executed on February 24, 2022.


Kathy Denworth

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13 *Application forthcoming

14 *Attorneys for Defendants Cathy's Creations,
Inc. and Catharine Miller*

15 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
16 **COUNTY OF KERN**

17 DEPARTMENT OF FAIR EMPLOYMENT
18 AND HOUSING, an agency of the State of
19 California,

20 Plaintiff;

21 v.

22 CATHY'S CREATIONS, INC. dba
TASTRIES, a California Corporation; and
23 CATHARINE MILLER, an individual,

24 Defendants.

25 EILEEN RODRIGUEZ-DEL RIO and
26 MIREYA RODRIGUEZ-DEL RIO,

27 Real Parties in Interest.
28

CASE NO.: BCV-18-102633

**Defendant Cathy's Creations, Inc.
dba Tastries Bakery's Objections and
Responses to Requests for Admission**

[Set One]

Action Filed: October 17, 2018
Trial Call: July 25, 2022

1 PROPOUNDING PARTIES: Plaintiff DEPARTMENT OF FAIR EMPLOYMENT
2 AND HOUSING
3 RESPONDING PARTIES: Defendant CATHY'S CREATIONS, INC. dba TASTRIES
4 BAKERY
5 SET NO.: ONE [Nos. 1-40]
6

7 Pursuant to Section 2033.210 of the California Code of Civil Procedure, Defendant Cathy's
8 Creations Inc. dba Tastries ("Tastries Bakery") responds and objects to Plaintiff Department of Fair
9 Employment and Housing's ("DFEH") First Set of Requests for Admission.
10

11 GENERAL OBJECTIONS

12 1. Tastries Bakery objects to each request insofar as it seeks information (1) not in
13 Tastries Bakery's possession, custody, or control; (2) prepared for or in anticipation of litigation
14 protected by the attorney-client privilege, contains work product, or is otherwise privileged;
15 (3) publicly available or otherwise equally available to the DFEH or equally available from third
16 parties; (4) that does not specifically refer to the events forming the subject matter of this litigation;
17 (5) not relevant to the subject matter of this litigation nor reasonably calculated to lead to the
18 discovery of admissible evidence; and (6) that imposes any requirement or obligation beyond the
19 scope of permissible discovery.

20 2. These responses and objections are made on the basis of information now known to
21 Tastries Bakery and are made without waiving any further objections to, or admitting the relevance
22 or materiality of, any of the information requested. Tastries Bakery's investigation, discovery, and
23 preparation for proceedings are continuing and all answers are given without prejudice to its right to
24 introduce or object to any subsequently discovered documents, facts, or information. Tastries Bakery
25 likewise does not waive the right to object, on any and all grounds, to (1) the evidentiary use of the
26 information contained in these responses and objections and (2) discovery requests relating to these
27 objections and responses.

28 3. Tastries Bakery will provide its responses based on terms as they are commonly

1 understood, and consistent with the California Code of Civil Procedure. Tastries Bakery objects to
2 and will refrain from extending or modifying any words employed in the requests to comport with
3 expanded definitions or instructions.

4 4. Tastries Bakery objects to the requests to the extent that they seek trade secrets
5 protected by Section 1060 of the California Evidence Code. Tastries Bakery will only provide
6 information protected by Section 1060 under the terms of an adequate protective order binding on
7 the parties or under equivalent safeguards.

8 Subject to and without waiving the foregoing objections, Tastries Bakery responds as follows:
9

10 **OBJECTIONS & RESPONSES TO REQUESTS FOR ADMISSION**

11 **REQUEST FOR ADMISSION NO. 1:**

12 Admit that YOU are a business establishment within the meaning of California Civil Code
13 section 51.

14 **Response: Admitted.**
15

16 **REQUEST FOR ADMISSION NO. 2:**

17 Admit that YOUR policy as expressed in YOUR Design Standards regarding selling custom
18 cakes to be used in same-sex marriage celebrations applies to all custom cakes, regardless of the design
19 or look of the cake.

20 **Response:** Defendant objects that the Design Standards speak for themselves. Although a
21 request for admission can properly seek authentication of the written materials disseminated, it is not
22 proper to use a request for admission "to obtain, by implication, a synoptic characterization of the
23 documents, or a gloss as to their intentment." (*Lakehead Pipe Line Co. v. American Home Assur. Co.*
24 (D. Minn. 1997) 177 F.R.D. 454, 458; see also *U.S. ex rel. Dyer v. Raytheon Co.* (D. Mass. 2013) 2013
25 WL 5348571, at *6.)

26 Defendant further objects on the basis that the request for admission is not "full and complete
27 in and of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete
28 in and of itself' when resort must necessarily be made to other materials in order to complete the

1 question." (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires
2 resort to written Design Standards which were not attached.

3 Finally, Defendant objects to the request on the basis that it assumes an incorrect
4 interpretation of the Design Standards. There is nothing in the Design Standards "regarding selling
5 custom cakes to be used in same-sex marriage celebrations." The Design Standards instead solely
6 concern "fundamental Christian principles" and "God's sacrament of marriage between a man and
7 a woman."

8 Subject to the foregoing objections, and without waiving them, Defendant responds as
9 follows: Defendant **admits** that its Design Standards apply to all of its products, custom or otherwise,
10 and regardless of their design or look.

11
12 **REQUEST FOR ADMISSION NO. 3:**

13 Admit that people who are not heterosexual enter into same-sex marriages.

14 **Response:** Defendant objects that the request is vague and ambiguous and may imply that
15 people who are not heterosexual *only* enter into same-sex marriages and never enter into opposite
16 sex marriages. Further, the request is vague and ambiguous as to "marriage" as some it may refer
17 solely to legal marriage, or may refer to same-sex marital unions entered into in States before same
18 sex marriage was legal, or marital unions between three or more individuals that are not currently
19 recognized by any state.

20 Subject to the foregoing objections, and without waiving them, Defendant responds as
21 follows: Defendant responds that it **lacks sufficient information or knowledge** to admit or deny this
22 request.

23
24 **REQUEST FOR ADMISSION NO. 4:**

25 Admit that people who are heterosexual do not enter into same-sex marriages.

26 **Response:** Defendant objects that the request is vague and ambiguous and may imply that
27 people who are heterosexual *never* enter into same-sex marriages and only enter into opposite-sex
28 marriages. Further, the request is vague and ambiguous as to "marriage" as some it may refer solely

1 to legal marriage, or may refer to same-sex marital unions entered into in States before same-sex
2 marriage was legal, or marital unions between three or more individuals that are not currently
3 recognized by any state.

4 Subject to the foregoing objections, and without waiving them, Defendant responds as
5 follows: Defendant responds that it **lacks sufficient information or knowledge** to admit or deny this
6 request.

7
8 **REQUEST FOR ADMISSION NO. 5:**

9 Admit that TASTRIES did not attempt to refer the RODRIGUEZ DEL-RIOS to another
10 bakery until after it learned they were a same-sex couple.

11 **Response:** Defendant objects that the request is vague and ambiguous and may imply sort of
12 causation between Defendant learning that the Real Parties were a same-sex couple and Defendant's
13 offer to connect them with another bakery. Defendant further objects that the term "referral"
14 assumes an incorrect interpretation of the facts. Defendant did not merely offer a "referral," but
15 offered to connect the Real Parties with the other bakery. Defendant attempted to connect the Real
16 Parties with another bakery that could provide them with a wedding cake for their same-sex wedding
17 upon discovering that Real Parties were seeking to commission Defendant to create a custom
18 wedding cake sending a message of celebration in violation of Defendant's neutral Design Standard
19 regarding covenantal marriage between one man and one woman.

20 Subject to the foregoing objections, and without waiving them, Defendant responds as
21 follows: To the extent that this request solely concerns the location of events in time, and not
22 causation: **Admitted.**

23
24 **REQUEST FOR ADMISSION NO. 6:**

25 Admit that if an opposite-sex couple sought to order custom cakes for use in the celebration
26 of their wedding that were identical to those sought from TASTRIES by the RODRIGUEZ-DE
27 RIOS, YOU would have taken and attempted to fulfill the order.

28 **Response:** Defendant objects to the request on the basis that it assumes an incorrect

1 interpretation of Tastries' process of accepting commissions for custom-designed baked goods. No
2 two custom-designed cake commissions are identical. There are numerous factors that go into
3 whether Defendant chooses to accept a cake order.

4 Subject to the foregoing objections, and without waiving them, Defendant responds as
5 follows: Defendant responds that it **lacks sufficient information or knowledge** to admit or deny this
6 request.

7
8 **REQUEST FOR ADMISSION NO. 7:**

9 Admit that TASTRIES selling custom cakes is not a religious practice.

10 **Response:** Defendant objects that the request is vague and ambiguous. Defendant's faith
11 places value in work and in sharing one's creative talents with the world. Defendant's faith teaches
12 that by working, one can grow closer to God and temper one's soul through labor done in love.
13 Defendant's faith also requires that she share her talents with the world, and to share what she is best
14 at for the betterment of all those around her. Negatively, Defendant's faith also requires that she
15 make a living, and not unnecessarily burden society through not working to support herself. Thus
16 although no aspect of Defendant's faith states that all Christians must operate a bakery that
17 specializes in wedding cakes, in a true sense, God has called her to operate such a baker.

18 Subject to the foregoing objections, and without waiving them, Defendant responds as
19 follows: **Denied.**

20
21
22 **REQUEST FOR ADMISSION NO. 8:**

23 Admit that TASTRIES selling custom cakes is not inherently expressive conduct under the
24 First Amendment to the United States Constitution.

25 **Response: Denied.**

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1 **REQUEST FOR ADMISSION NO. 9:**

2 Admit there is a legal distinction between YOU and MILLER.

3 **Response: Admitted.**

5 **REQUEST FOR ADMISSION NO. 10:**

6 Admit that YOU will sell pre-made "case" cakes to customers for any purpose, including
7 their use in the celebration of same-sex marriages.

8 **Response:** Defendant objects to the request on the basis that it is vague and ambiguous as to
9 "sell" and "purpose." Sometimes, depending on whether the "case" cake has decorations on its top
10 or has a flat top, Defendant may write a statement identifying the customer's purpose for the cake
11 (e.g., "Happy Birthday"). Defendant will not write statements that violate its religious beliefs. But
12 pre-made products are, by definition, not crafted for, or tailored to, any particular purpose and
13 therefore Defendant has no objections to customers using those products for any particular purpose.

14 Subject to the foregoing objections, and without waiving them, Defendant responds as
15 follows: **Admitted.**

17 **REQUEST FOR ADMISSION NO. 11:**

18 Admit that YOUR policy regarding the sale of cakes for same-sex wedding celebrations only
19 applies to custom cake orders.

20 **Response:** Defendant objects that the Design Standards speak for themselves. Although a
21 request for admission can properly seek authentication of the written materials disseminated, it is not
22 proper to use a request for admission "to obtain, by implication, a synoptic characterization of the
23 documents, or a gloss as to their intendment." (*Lakehead Pipe Line Co. v. American Home Assur. Co.*
24 (D. Minn. 1997) 177 F.R.D. 454, 458; see also *U.S. ex rel. Dyer v. Raytheon Co.* (D. Mass. 2013) 2013
25 WL 5348571, at *6.)

26 Defendant further objects on the basis that the request for admission is not "full and complete
27 in and of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete
28 in and of itself' when resort must necessarily be made to other materials in order to complete the

question.” (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to written Design Standards which were not attached.

Finally, Defendant objects to the request on the basis that it assumes an incorrect interpretation of the Design Standards. There is nothing in the Design Standards “regarding selling custom cakes to be used in same-sex marriage celebrations.” The Design Standards instead solely concern “fundamental Christian principles” and “God’s sacrament of marriage between a man and a woman.”

Subject to the foregoing objections, and without waiving them, Defendant responds as follows: Defendant **admits** that no application of its policies regarding covenantal marriage between one man and one woman applies to pre-made products which are, by definition, not crafted for, or tailored to, any particular purpose.

REQUEST FOR ADMISSION NO. 12:

Admit that YOU have sold custom cakes that were intended for use in or used in same-sex wedding celebrations in the past.

Response: Defendant objects to the request on the basis that it is vague and ambiguous as to “intended.” None of Defendant’s custom-designed wedding cakes are ever intended by Defendant to be used in a same-sex wedding celebration. However, others may have such an intent.

Subject to the foregoing objections, and without waiving them, Defendant responds as follows: **Admitted.**

REQUEST FOR ADMISSION NO. 13:

Admit that YOU have employees who have no religious objection to participating in the design and creation of custom cakes for use in same-sex wedding celebrations.

Response: Defendant objects on the basis that the term “religious objection” is vague and ambiguous, and may or may not call for a legal conclusion. Defendant further objects on the basis of third-party privacy: Defendant does not poll its employees on their religious beliefs, which are not

relevant to this action. (*Guthrey v. California Dept. of Corrections and Rehabilitation* (E.D. Cal. 2012) 2012 WL 2499938.)

Subject to the foregoing objections, and without waiving them, Defendant responds as follows: Defendant **lacks sufficient information or knowledge** to admit or deny this request. However, Defendant admits that in her deposition, Taylor Arbolante stated words to the effect that she would feel comfortable making a wedding cake for a same-sex couple, without clearly explaining whether this was in light of, or in spite of, her views on same-sex marriage, and what may influence those views.

REQUEST FOR ADMISSION NO. 14:

Admit that when the RODRIGUEZ-DEL RIOS attempted to order cakes from YOU for use in the celebration of their wedding, YOU had employees who had no religious objection to participating in the design and creation of custom cakes for use in same-sex wedding celebrations.

Response: Defendant objects on the basis that the term "religious objection" is vague and ambiguous, and may or may not call for a legal conclusion. Defendant further objects on the basis of third-party privacy: Defendant does not poll its employees on their religious beliefs, which are not relevant to this action. (*Guthrey v. California Dept. of Corrections and Rehabilitation* (E.D. Cal. 2012) 2012 WL 2499938.)

Subject to the foregoing objections, and without waiving them, Defendant responds as follows: Defendant **lacks sufficient information or knowledge** to admit or deny this request. However, Defendant admits that in her deposition, Taylor Arbolante stated words to the effect that she would feel comfortable making a wedding cake for a same-sex couple, without clearly explaining whether this was in light of, or in spite of, her views on same-sex marriage, and what may influence those views.

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1 **REQUEST FOR ADMISSION NO. 15:**

2 Admit that YOU could have fulfilled the order for the cakes the RODRIGUEZ-DEL RIOS
3 wanted to order for use in the celebration of their marriage without the personal participation of
4 MILLER.

5 **Response:** Defendant objects on the basis that the term "personal participation" is vague
6 and ambiguous because the vast majority of Defendant's custom-design services involve Cathy
7 Miller's personal participation, and at the very least, all of them derive from prior design services in
8 which Miller personally participated.

9 Subject to the foregoing objections, and without waiving them, Defendant responds as
10 follows: **Denied.**

11
12 **REQUEST FOR ADMISSION NO. 16:**

13 Admit that in 2017 MILLER did not personally participate in the design and creation of every
14 custom cake YOU sold.

15 **Response:** Defendant objects on the basis that the term "personally participate" is vague and
16 ambiguous because the vast majority of Defendant's custom-design services involve Cathy Miller's
17 personal participation, and at the very least, all of them derive from prior design services in which
18 Miller personally participated.

19 Subject to the foregoing objections, and without waiving them, Defendant responds as
20 follows: **Denied.**

21
22 **REQUEST FOR ADMISSION NO. 17:**

23 Admit that YOU do not know the purpose for which every custom cake YOU sell is being
24 used.

25 **Response:** Defendant objects on the basis that the term "know the purpose" is vague and
26 ambiguous. Defendant's collaborative process of creating custom designed baked goods involves
27 inquiring of the purpose of every custom order so that the design can be properly tailored. But, of
28 course, a client could intentionally seek to mislead Defendant. Defendant interprets this request as

1 not concerning the situation of an intentional misleading of Defendant.

2 Subject to the foregoing objections, and without waiving them, Defendant responds as
3 follows: **Denied.**

4
5 **REQUEST FOR ADMISSION NO. 18:**

6 Admit that a white or off-white wedding cake with flower/rosette decorations with no written
7 message and no cake topper reveals nothing about the identity of the couple getting married.

8 **Response:** Defendant objects on the basis that the term "identity" is vague and ambiguous.
9 Merriam-Webster's Dictionary indicates that "identity" is defined as including "the distinguishing
10 character or personality of an individual." Black's Law Dictionary indicates that "identity" is
11 defined as "[t]he distinguishing personality or attributes of an individual" or "[m]ore generally, the
12 qualities and attitudes that a person or group of people have, differentiating them from others." In
13 this respect, a white or off-white wedding cake with flower/rosette decorations, but with no written
14 message and no cake topper may reveal the aspects of an individual's character or personality that
15 they deem distinguishing; and it may not, depending on the individual. However, no cake, no matter
16 how intricate could be used to identify any specific individual. Defendant interprets this request as
17 not concerning the situation of seeking to identify any specific individual.

18 Subject to the foregoing objections, and without waiving them, Defendant responds as
19 follows: **Denied.**

20
21 **REQUEST FOR ADMISSION NO. 19:**

22 Admit that YOU cannot guarantee that potential customers YOU refer to another bakery for
23 a custom cake will actually be able to obtain a cake that is the same as the cake YOU would create
24 based on the same order.

25 **Response.** Defendant objects to the request on the basis that it assumes an incorrect
26 interpretation of Defendant's collaborative process with potential clients. Defendant does not take
27 an "order," but engages in a collaborative artistic process with each client to custom-design a unique
28 product. Further, the goal of Defendant connecting clients with other bakeries is not to obtain the

1 "same" wedding cake, but sometimes a better cake that will better suit their needs, or—at the very
2 least—a cake that will suit their needs.

3 Subject to the foregoing objections, and without waiving them, Defendant responds as
4 follows: **Admitted.**

5
6 **REQUEST FOR ADMISSION NO. 20:**

7 Admit that YOUR custom wedding cakes are fungible goods.

8 **Response:** Defendant objects on the basis that the term "fungible" is vague and ambiguous,
9 as Defendant's custom-design services can be exchanged, but each custom wedding cake is unique.

10 Subject to the foregoing objections, and without waiving them, Defendant responds as
11 follows: **Denied.**

12
13 **REQUEST FOR ADMISSION NO. 21:**

14 Admit that YOUR sale of custom cakes to be used as part of an event does not send a message
15 of endorsement in support of every event for which YOU sell custom cakes.

16 **Response:** Defendant objects on the basis that the term "endorsement" is vague and
17 ambiguous. Merriam-Webster's Dictionary describes "endorse" as defined as "to recommend," "to
18 approve openly," or "to express support or approval of publicly and definitely." Thus, certain
19 members of the public with closer knowledge of Defendant's operations will know that it only creates
20 cakes that do not send messages contradicting "fundamental Christian principles."

21 Subject to the foregoing objections, and without waiving them, Defendant responds as
22 follows: **Denied.**

23
24 **REQUEST FOR ADMISSION NO. 22:**

25 Admit that YOU have no evidence to support the third affirmative defense asserted in YOUR
26 ANSWER.

27 **Response:** Defendant objects on the basis that the request for admission is not "full and
28 complete in and of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and

1 complete in and of itself' when resort must necessarily be made to other materials in order to
2 complete the question." (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this
3 request requires resort to the third affirmative defense (unclean hands).

4 Subject to the foregoing objections, and without waiving them, Defendant responds as
5 follows: **Denied**.

6
7 **REQUEST FOR ADMISSION NO. 23:**

8 Admit that YOU have no evidence to support the fourth affirmative defense asserted in
9 YOUR ANSWER.

10 **Response:** Defendant objects on the basis that the request for admission is not "full and
11 complete in and of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and
12 complete in and of itself' when resort must necessarily be made to other materials in order to
13 complete the question." (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this
14 request requires resort to the fourth affirmative defense (abuse of process).

15 Subject to the foregoing objections, and without waiving them, Defendant responds as
16 follows: **Denied**.

17
18 **REQUEST FOR ADMISSION NO. 24:**

19 Admit that YOU have no evidence to support the fifth affirmative defense asserted in YOUR
20 answer.

21 **Response:** Defendant objects on the basis that the request for admission is not "full and
22 complete in and of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and
23 complete in and of itself' when resort must necessarily be made to other materials in order to
24 complete the question." (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this
25 request requires resort to the fifth affirmative defense (fraudulent intent to gain access).

26 Subject to the foregoing objections, and without waiving them, Defendant responds as
27 follows: **Denied**.

1 **REQUEST FOR ADMISSION NO. 25:**

2 Admit that YOU have no evidence to support the sixth affirmative defense asserted in YOUR
3 answer.

4 **Response:** Defendant objects on the basis that the request for admission is not "full and
5 complete in and of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and
6 complete in and of itself' when resort must necessarily be made to other materials in order to
7 complete the question." (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this
8 request requires resort to the sixth affirmative defense (justification).

9 Subject to the foregoing objections, and without waiving them, Defendant responds as
10 follows: **Denied.**

11
12 **REQUEST FOR ADMISSION NO. 26:**

13 Admit that YOU have no evidence to support the seventh affirmative defense asserted in
14 YOUR answer.

15 **Response:** Defendant objects on the basis that the request for admission is not "full and
16 complete in and of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and
17 complete in and of itself' when resort must necessarily be made to other materials in order to
18 complete the question." (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this
19 request requires resort to the seventh affirmative defense (estoppel).

20 Subject to the foregoing objections, and without waiving them, Defendant responds as
21 follows: **Denied.**

22
23 **REQUEST FOR ADMISSION NO. 27:**

24 Admit that YOU have no evidence to support the eighth affirmative defense asserted in
25 YOUR answer.

26 **Response:** Defendant objects on the basis that the request for admission is not "full and
27 complete in and of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and
28 complete in and of itself' when resort must necessarily be made to other materials in order to

complete the question." (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to the eighth affirmative defense (no injury).

Subject to the foregoing objections, and without waiving them, Defendant responds as follows: **Denied.**

REQUEST FOR ADMISSION NO. 28:

Admit that YOU have no evidence to support the eleventh affirmative defense asserted in YOUR answer.

Response: Defendant objects on the basis that the request for admission is not "full and complete in and of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete in and of itself' when resort must necessarily be made to other materials in order to complete the question." (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to the eleventh affirmative defense (California Free Exercise).

Subject to the foregoing objections, and without waiving them, Defendant responds as follows: **Denied.**

REQUEST FOR ADMISSION NO. 29:

Admit that YOU have no evidence to support the twelfth affirmative defense asserted in YOUR answer.

Response: Defendant objects on the basis that the request for admission is not "full and complete in and of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and complete in and of itself' when resort must necessarily be made to other materials in order to complete the question." (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to the twelfth affirmative defense (Federal Free Exercise).

Subject to the foregoing objections, and without waiving them, Defendant responds as follows: **Denied.**

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1 **REQUEST FOR ADMISSION NO. 30:**

2 Admit that YOU have no evidence to support the thirteenth affirmative defense asserted in
3 YOUR answer.

4 **Response:** Defendant objects on the basis that the request for admission is not "full and
5 complete in and of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and
6 complete in and of itself' when resort must necessarily be made to other materials in order to
7 complete the question." (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this
8 request requires resort to the thirteenth affirmative defense (Free Speech).

9 Subject to the foregoing objections, and without waiving them, Defendant responds as
10 follows: **Denied.**

11
12 **REQUEST FOR ADMISSION NO. 31:**

13 Admit that YOU have no evidence to support the fourteenth affirmative defense asserted in
14 YOUR answer.

15 **Response:** Defendant objects on the basis that the request for admission is not "full and
16 complete in and of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and
17 complete in and of itself' when resort must necessarily be made to other materials in order to
18 complete the question." (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this
19 request requires resort to the fourteenth affirmative defense (Due Process).

20 Subject to the foregoing objections, and without waiving them, Defendant responds as
21 follows: **Denied.**

22
23 **REQUEST FOR ADMISSION NO. 32:**

24 Admit that YOU have no evidence to support the fifteenth affirmative defense asserted in
25 YOUR answer.

26 **Response:** Defendant objects on the basis that the request for admission is not "full and
27 complete in and of itself." (Civ. Proc. Code § 2033.060(d).) A request for admission "is not 'full and
28 complete in and of itself' when resort must necessarily be made to other materials in order

complete the question." (*Catanese v. Superior Court* (1996) 46 Cal.App.4th 1159, 1164.) Here, this request requires resort to the fifteenth affirmative defense (Equal Protection).

Subject to the foregoing objections, and without waiving them, Defendant responds as follows: **Denied.**

REQUEST FOR ADMISSION NO. 33:

Admit that the Unruh Civil Rights Act, Civil Code section 51, is neutral (i.e., does not treat religion or those practicing religion differently from others to whom it applies) on its face.

Response: Denied.

REQUEST FOR ADMISSION NO. 34:

Admit that the Unruh Civil Rights Act, Civil Code section 51, is generally applicable (i.e., applies to all business establishments) on its face.

Response: Denied.

REQUEST FOR ADMISSION NO. 35:

Admit that the RODRIGUEZ-DEL RIOS attempted to place an order for cakes for use in the celebration of their marriage, not as part of a plan to seek a lawsuit against YOU.

Response: Defendant lacks sufficient information to admit or deny this request.

REQUEST FOR ADMISSION NO. 36:

Admit that YOUR business operations are not officially affiliated with any religious organization.

Response: Admitted.

REQUEST FOR ADMISSION NO. 37:

Admit that YOU were not incorporated as a religious entity.

Response: Admitted.

1 **REQUEST FOR ADMISSION NO. 38:**

2 Admit that white or off-white, round, three-tiered cakes with buttercream frosting and no
3 written message can be used as part of events other than weddings.

4 **Response:** Defendant objects on the basis that the request for admission is vague and
5 ambiguous as to "can be used" and as to "white or off-white, round, three-tiered cakes with
6 buttercream frosting and no written message."

7 Subject to the foregoing objections, and without waiving them, Defendant responds as
8 follows: **Admitted.**

9
10 **REQUEST FOR ADMISSION NO. 39:**

11 Admit that TASTRIES has sold white or off-white, round, three-tiered cakes with
12 buttercream frosting and no written message for use as part of events other than weddings.

13 **Response:** Defendant objects on the basis that the request for admission is vague and
14 ambiguous as to "for use as" and as to "white or off-white, round, three-tiered cakes with
15 buttercream frosting and no written message."

16 Subject to the foregoing objections, and without waiving them, Defendant responds as
17 follows: **Admitted.**

18
19 **REQUEST FOR ADMISSION NO. 40:**

20 Admit that as a licensed and incorporated business, YOU must follow state and local laws and
21 regulations, including but not limited to health and safety and anti-discrimination provisions, in order
22 to legally operate in California.

23 **Response:** Defendant objects on the basis that the request calls for a legal conclusion and is
24 vague and ambiguous. Defendant does not have to follow any state or local laws that violate the
25 California or U.S. Constitutions.

26 ///

27 ///

28 ///

1 Subject to the foregoing objections, and without waiving them, Defendant responds as
2 follows: **Denied.**

3
4 LiMANDRI & JONNA LLP

5
6 Dated: February 24, 2022

By: 

Charles S. LiMandri

Paul M. Jonna

Jeffrey M. Trissell

Milan L. Brandon II

Attorneys for Defendants

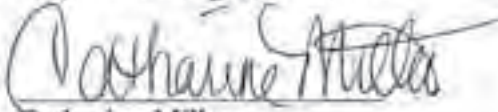
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VERIFICATION

I, Catharine Miller, am the owner of Defendant Cathy's Creations, Inc. dba Tastries, a defendant in this action. I have read the document, **Defendant Cathy's Creations, Inc. dba Tastries Bakery's Objections and Responses to Requests for Admission [Set One]** and know its contents. I make this verification on behalf of Tastries Bakery. The information supplied in the foregoing document is based on my own personal knowledge or has been supplied by my attorneys or other agents or compiled from available documents and is provided as required by law. The information in the foregoing document is true to the extent of my personal knowledge. As to the information provided by my attorneys or other agents or compiled from available documents, including all contentions and opinions, I do not have personal knowledge but made a reasonable and good faith effort to obtain the information by inquiry to other natural persons or organizations, except where the information is equally available to the propounding party. Thus, I am informed and believe that the matters stated in the foregoing document are true and on that ground certify or declare under penalty of perjury under the laws of the United States and the State of California that the foregoing is true and correct.

Executed this 24th day of February 2022, at San Diego, California.


Catharine Miller

COURT OF THE STATE OF CALIFORNIA KERN COUNTY SUPERIOR COURT - METROPOLITAN DIVISION		FOR COURT USE ONLY
TITLE OF CASE (Abbreviated) Dept. of Fair Employment & Housing v. Cathy's Creations, Inc. dba Tastries		
ATTORNEY(S) NAME AND ADDRESS Charles S. LiMandri, SBN 110841 Paul M. Jonna, SBN 265389 FREEDOM OF CONSCIENCE DEFENSE FUND P.O. Box 9520 Rancho Santa Fe, California 92067 Tele: (858) 759-9948; Fax: (858) 759-9938		
ATTORNEY(S) FOR: Defendants CATHY'S CREATIONS, INC. d/b/a TASTRIES, a California Corporation; and CATHY MILLER, an individual	HEARING Dept. 11	CASE NO.: BCV-18-102633 JUDGE: Hon. J. Eric Bradshaw

CERTIFICATE OF SERVICE

I, Kathy Denworth, declare that: I am over the age of 18 years and not a party to the action; I am employed in, or am a resident of the County of San Diego, California; where the mailing occurs; and my business address is P.O. Box 9520, Rancho Santa Fe, CA 92067, Telephone number (858) 759-9948; Facsimile number (858) 759-9938. I further declare that I served the following document(s) on the parties in this action:

- Defendant Cathy's Creations, Inc. dba Tastries Bakery's First Amended Responses to Special Interrogatories [Set One];
- Defendant Cathy's Creations, Inc. dba Tastries Bakery's Objections and Responses to Requests for Admission [Set One];
- Defendant Cathy's Creations, Inc. dba Tastries Bakery's Objections and Responses to Form Interrogatories [Set Two];
- Defendant Cathy's Creations, Inc. dba Tastries Bakery's Responses and Objections to Requests for Production of Documents [Set Two];
- Defendant Cathy's Creations, Inc. dba Tastries Bakery's Objections and Responses to Form Interrogatories [Supplemental]; and
- Defendant Cathy's Creations, Inc. dba Tastries Bakery's Responses and Objections to Requests for Production of Documents [Supplemental]

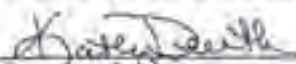
by one or more of the following methods of service to:

Janette Wipper, Chief Counsel
Paula D. Pearlman, Asst. Chief Counsel
Gregory J. Mann - Sr. Staff Counsel
Timothy Martin, Staff Counsel
Tiffany Tejada, Staff Counsel
Soyeon Mesinas, Staff Counsel
Department of Fair Employment and Housing
320 4th Street, Suite 1000
Los Angeles, CA 90013
Tel: (213) 439-6799; Fax: (888) 382-5293
E-Mail: Gregory.Mann@dfeh.ca.gov
E-Mail: Tiffany.Tejada@dfeh.ca.gov
E-Mail: Soyeon.Mesinas@dfeh.ca.gov
Attorneys for Plaintiff Department of Fair Employment and Housing

- ☒ **(BY U.S. MAIL)** I caused such document(s) to be sealed in envelopes, and with the correct postage thereon fully prepaid, either deposited in the United States Postal Service or placed for collection and mailing following ordinary business practices.
- ☒ **(BY E-MAIL/ELECTRONIC MAIL)** I caused a copy of the foregoing document(s) to be sent to the persons at the e-mail addresses listed above, this date via internet/electronic mail.
- ☐ **(BY ELECTRONIC FILING/SERVICE)** I caused such document(s) to be Electronically Filed and/or Service through the One Legal System.

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

Executed on February 24, 2022.


Kathy Denworth

Tastries Employee List

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Employee Name	Start	Current	Principal	Role	2022	2021	2020	2019	2018	2017	2016	2015	2014	2013	Phone	email	Address
Barbara Moore	01/01/13			Baker										x	(661) 304-7683	ryanbarraza@att.net	8702 Winlock St, Bakersfield CA 93312
Darlene Arriola-Barraza	01/01/13	PT		Decorator	x	x	x	x	x	x	x	x	x	x	(661) 340-4432	braydonfer@msn.com	11626 Indian Hawthorne, Bakersfield CA 93311
Erin Ferguson	01/01/13	PT		Decorator										x	(661) 549-5529	ktmiller143@gmail.com	13315 Scafell Pike Street, Bakersfield CA 93314
Katrina Miller	01/17/13			Support										x			11506 Finsbury Ct, Bakersfield CA 93312
Gina Palomino	02/11/13			Sales										x			2725 Kaibab Av, Bakersfield CA 93306
Ellie Peters	03/04/13			Sales										x	(661) 742-4616	elliefischer888@gmail.com	8101 Camino Media #213, Bakersfield CA 93314
Nichole Salas	04/18/13	FT		Baker	x	x	x	x	x	x	x	x	x	x	(661) 619-0568	nicholasalas777@yahoo.com	201 Louella Drive, Bakersfield CA 93307
Heather Miller	04/29/13			Sales										x	(951) 640-6346	richemil234@gmail.com	431 E Olive Avenue, Monrovia CA 91016
Mary Johnson	05/04/13			Decorator										x	(661) 578-3367	chefmar90@yahoo.com	722 Castro Lane, Bakersfield CA 93304
Mariyah Flores	11/11/13			Baker										x	(661) 742-0181	gm429@yahoo.com	2601 Columbus St, APT C6, Bakersfield CA 93306
Carolina Vasquez	12/07/13			Sales										x			2100 Courtleigh Drive, Bakersfield CA 93309
Sandy Borja	01/01/14			Sales										x	(661) 912-3888	bekahluu@live.com	3700 Q Street #222, Bakersfield CA 93301
Sandy Borja	01/01/14			Baker										x	(347) 480-0587	sandyborja@ymail.com	126 Blueflax Lane, Pfluberville TX 78660
Brittany Arriola	03/01/14			Support										x	(661) 578-7509	britt.arri@gmail.com	11626 Indian Hawthorne, Bakersfield CA 93311
Priscilla Claro	04/17/14			Dish Washer										x			1427 Belmont Street, Delano CA 93215
Kristen Hinkle-Edwards	06/02/14			Baker				x	x	x	x	x	x	x	(661) 330-9724	kristenhinkle27@yahoo.com	124 Sequoia Drive, Bakersfield CA 93308
Caitlin Wingate	06/03/14			Sales										x	(661) 364-9665	caitlinwingate@gmail.com	4231 Country Club Drive, Bakersfield CA 93306
Megan Morris	06/20/14			Decorator										x	(661) 348-1244	mamorris4@yahoo.com	4301 Fruitvale Avenue #236, Bakersfield CA 93308
Autem Flad	07/01/14			Sales										x	(661) 444-3259	autemleaf@gmail.com	1831 Orange Street Apt. B, Bakersfield CA 93304
Maria Garcia Gary	07/09/14			Baker										x	(661) 706-2502	angle_garcia-garay@att.net	8201 Lanora Avenue, Bakersfield CA 93306
Marissa Patton	08/01/14			Support										x	(661) 477-4009	marissabrooke13@gmail.com	13311 Nantucket Place, Bakersfield CA 93314
Sherry LeCain	08/13/14			Sales										x	(530) 276-5152	missjulepipin@yahoo.com	2063 S Starling Drive, Gilbert AZ 85295
Viki Williams	09/01/14			Support										x	(661) 205-5029	slecaing97@gmail.com	4305 S Real Road, Bakersfield CA 93313
Rebecca Baldwin	09/03/14			Sales										x	(661) 444-2378	jlmw2000@aol.com	5107 Antares Court, Bakersfield CA 93306
Remae Williams	09/16/14			Baker										x	(661) 817-0549	beccabaldwin79@yahoo.com	2504 El Portal, Bakersfield CA 93309
Stephanie Esparza	09/16/14			Baker										x	(661) 500-3952	remiw623@gmail.com	2401 Golden Street #28, Bakersfield CA 93308
Denise Myers	10/16/14			Decorator										x	(661) 431-5579	s.esparzasstephanie@gmail.com	2505 Weedpatch Highway, Bakersfield CA 93307
Donna Gomez	11/19/14			Sales										x	(661) 747-4288	dlm4288@yahoo.com	413 Joelye Street, Bakersfield CA 93314
Katie Bernal	11/19/14			Sales										x	(661) 717-3500	donna_east@live.com	3024 Chester Lane, Bakersfield CA 93304
Ana Carrillo	12/16/14			Baker										x	(661) 706-2368	thefactor5@yahoo.com	1709 Verde Street, Bakersfield CA 93304
Nicole Sawyer	02/02/15			Sales										x	(661) 619-7039	anacarrillo110894@yahoo.com	309 Berkshire Road, Bakersfield CA 93307
Amy White	02/03/15			Baker										x	(661) 900-1787	nicolesawyer0@yahoo.com	8200 N Laurelglen Blvd #1016, Bakersfield CA 93311
Connie Sorensen	03/09/15			Sales										x	(805) 415-8265	amynfelkel@gmail.com	4201 Jewetta Avenue #H2, Bakersfield CA 93312
Jason Frater	05/18/15			Dish Washer										x	(559) 392-2358	csorensen015@gmail.com	6100 Tudor Way #116, Bakersfield CA 93306
Kathy Velarde	05/25/15			Baker										x	(661) 331-9656	jfrater21@gmail.com	26325 Arboretum Way #504, Murrieta CA 92563
Catalina Vielma	06/15/15			Decorator										x	(661) 378-2663	kathylvelarde37@yahoo.com	8622 Rockhampton Drive, Bakersfield CA 93313
Taylor Arbolante	07/22/15	FT		Decorator	x	x	x	x	x	x	x	x	x	x	(661) 447-7071	catalinavielma4@icloud.com	2731 Bernard St, Bakersfield CA 93306
Amber Eliason	08/10/15			Support										x	(661) 599-0818	taylorarbolante@gmail.com	1000 McDonald Way #26, Bakersfield CA 93309
Elizabeth LeCain	08/18/15			Sales										x	(661) 447-2678	lizzieleca@outlook.com	4201 Palisades Circle, Bakersfield CA 93308
Natalie Boatwright	09/07/15			Sales										x	(661) 864-6230	lizzieleca@outlook.com	2512 Noble Avenue, Bakersfield CA 93306
Lizet Aleman	09/21/15	FT		Decorator	x	x								x	(661) 706-6615	lizet-188@hotmail.com	8418 Exodus Lane, Bakersfield CA 93312
Justin Umruh	09/26/15			Sales										x	(661) 342-3564	justin@justinmuh.com	6700 Auburn Street #185, Bakersfield CA 93306
Kasandra Murillo	10/18/15			Janitorial										x	(661) 348-1011	kmurillo1234@gmail.com	3300 Janene Way, Bakersfield CA 93306
Tina Hodges	11/10/15			Baker										x	(661) 376-8351	hdmomnateddy@yahoo.com	1101 Oleander Avenue #36, Bakersfield CA 93301
Jimmy Andrade	11/30/15			Baker										x	(818) 668-0726	jlatattoos2015@gmail.com	3215 Chester Avenue #119, Bakersfield, CA 93301
Bailey Arbolante	12/30/15			Sales										x	(661) 669-6367	baileyarbolante@gmail.com	129 Cedar Street, Bakersfield CA 93304
Melinda Massey	02/01/16			Baking/Sales				x						x	(661) 496-4387	dmasssey@live.com	8603 Fairfield Drive, Bakersfield CA 93311
Kristi Garrett	03/01/16			Sales										x	(661) 283-5613	crystalvaldez.v18@gmail.com	5515 Willard Street, Bakersfield CA 93314
Zoe Harber	03/01/16			Sales										x	(661) 444-5700	mrsgr7707@aol.com	201 Rodman Street, Bakersfield CA 93307
Savannah Hernandez	03/07/16			Sales										x	(661) 330-4303	findingzoe@yahoo.com	4040 Crow Road #310, Beaumont TX 77706
Jessica Gonzales	04/13/16			Decorator				x	x					x	(661) 496-8961	heyitsavannah@aol.com	12504 Lavina Avenue, Bakersfield CA 93312
Justin Salinas	05/05/16			Decorator										x	(661) 447-9124	jessica4complete@gmail.com	3900 Riverlakes Drive #13D, Bakersfield CA 93312
Sarah Howze	05/06/16			Support										x	(661) 557-5719	jsalinas@wau.com	2533 Basque Hills Drive, Bakersfield CA 93313
Mayra Silva	06/06/16			Baker										x	(661) 616-8169	sarahbell95@ymail.com	PO Box 1281, Bakersfield CA 93302
														x	(507) 412-9967	mayra.silva_420@hotmail.com	11111 Academy Avenue, Bakersfield CA 93312
														x			403 Real Road #44, Bakersfield CA 93309

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Tastries Employee List

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Employee Name	Start	Current	Principal	Role	2022	2021	2020	2019	2018	2017	2016	2015	2014	2013	Phone	email	Address
Justin Cordova	06/27/16			Dish Washer							x				(661) 900-5592	jj_cordova61@yahoo.com	301 Rush Street, Bakersfield CA 93306
Ena Alva	08/08/16			Dish Washer				x	x	x	x				(661) 865-0254	ashes2crowns@gmail.com	919 Chelsea Street, Bakersfield CA 93306
Christina Mendez	08/22/16			Sales						x	x				(661) 348-1244	jbutamante6769@gmail.com	4603 Sun Devils Avenue, Bakersfield CA 93313
Thaimyra Hernandez	08/22/16			Sales						x	x				(661) 599-4846	yami971621@ymail.com	9523 Palma Lane, Bakersfield CA 93313
Holly Black	08/30/16			Baker						x	x						9701 Commodore Drive, Bakersfield CA 93312
Sonja Troncozo	08/30/16			Sales						x	x				(661) 345-1709	bobbysbunny@troncozo.com	12519 Catskill Drive, Bakersfield CA 93312
Jessica Criollo	09/07/16			Decorator								x			(661) 619-9511	jessica_criollo@live.com	3908 Frazier Avenue, Bakersfield CA 93309
Jason Martinez	10/17/16			Decorator					x		x				(661) 472-4499	jsin497@gmail.com	5000 Belle Terrace Avenue #166, Bakersfield CA 93309
Rosemary Perez	11/01/16			Sales	x	x	x	x	x		x				(661) 205-4555	rosemary.perez1970@gmail.com	5910 Potenza Lane, Bakersfield CA 93308
Erik Ramos Ortega	11/05/16			Temp Support							x						705 Pinewood Court, Bakersfield CA 93304
Michael Marquez	04/25/17			Baker						x					(661) 865-0150	mikemarquez110988@gmail.com	201 Louella Drive, Bakersfield CA 93307
Nadine McCaslin	05/31/17			Baker						x					(408) 391-5874	dee_mccaslin88@yahoo.com	15600 Carparzo Drive, Bakersfield CA 93314
Carolynne Redick	06/05/17			Janitorial					x	x					(661) 889-4087	mrs_redick07@yahoo.com	5303 Banning Road, Bakersfield CA 93314
Janet Pennington	06/05/17			Janitorial					x	x					(661) 910-0418	janetmassey101@gmail.com	4753 Willard Street, Bakersfield CA 93311
Hope Maiden	06/10/17			Sales						x							506 Infantry Way, Bakersfield CA 93301
Yuri Carolina Valencia	06/20/17			Decorator	x	x	x	x	x	x					(661) 346-2958	valenciayuricarolina@yahoo.com	1104 Beryl Drive, Bakersfield CA 93304
Jordan Martens	07/06/17			Sales				x	x	x					(661) 221-3380	jordanbeaty94@gmail.com	9304 Kingsmill Lane, Bakersfield CA 93312
Paige Urioste	09/01/17			Baker						x					(661) 623-0982	paigeurioste@yahoo.com	10523 Odyssy Way, Taft CA 93268
Serena Contreras	09/02/17			Sales				x	x	x					(661) 381-3911	serenak97@gmail.com	5502 Lombardy Court, Bakersfield CA 93308
Skyler Johnson	09/05/17			Sales						x					(661) 348-0281		3012 NW Eddy Rock Road, La Center WA 98629
Andrew Johnson	10/27/17			Baker				x	x	x					(661) 444-4435	ajohnsoncs@gmail.com	1000 McDonald Way #26, Bakersfield CA 93309
Amelia Verdin	11/30/17			Baker						x					(661) 303-6236	aquer64@gmail.com	6505 Canyon View Court, Bakersfield CA 93306
Mark Lopez	11/30/17			Decorator						x					(661) 817-2337	cakecrafter89@yahoo.com	4501 Center Street, Bakersfield CA 93306
Kamry Gonzalez	01/03/18			Temp Sales				x	x						(661) 436-9375	kamry.gonzalez@aol.com	1416 Duke Drive, Bakersfield CA 93306
Brandie Goodwin	01/11/18			Sales					x						(661) 421-9191	brandiegoodwin21@yahoo.com	7033 Rosedale Hwy #2
Melody Elrod	02/01/18			Sales						x					(661) 303-0248	mnelrod@icloud.com	5800 Running Brook Street, Bakersfield CA 93312
Elvia Morales	02/06/18			Sales						x					(323) 804-2812	elviagmorales5@gmail.com	1540 Sunset Street, Wasco CA 93280
Baylee Johnston	03/08/18			Sales	x	x	x	x	x						(661) 303-9155	johnston_baylee@yahoo.com	7920 Nile River Court, Bakersfield CA 93313
Courtney Carr	03/16/18			Baker						x					(661) 864-8607	courtntutt2012@gmail.com	6351 Akers Road #84, Bakersfield CA 93313
Angie Jett	05/01/18			Sales			x								(661) 204-4049	ourfamilyjett@yahoo.com	4820 Marsh Hawk Drive, Bakersfield CA 93312
Corinne Gomez	05/01/18			Baker			x								(661) 932-3431	corinnecimone@gmail.com	8618 Rockhampton Drive, Bakersfield CA 93313
Greg Giraldo	05/09/18			Janitorial				x		x					(661) 380-2162	giraldo_gregory@yahoo.com	1104 Beryl Drive, Bakersfield CA 93304
Camryn Enos	07/05/18			Sales					x								5303 Challenger Av, Bakersfield CA 93312
Balbina Cortes	07/09/18			Baker				x		x					(661) 379-9912	milo042011@icloud.com	3105 California Ave, Bakersfield CA 93304
Ezequiel Oscar Vielma	07/09/18			Baker						x					(661) 376-6397	ezequielvielma@yahoo.com	1411 Quince St, Bakersfield CA 93305
Makenna East	08/31/18			Sales			x	x	x						(661) 401-9127	kennabear270@gmail.com	12614 Trackside Dr, Bakersfield CA 93312
Cassandra Moreno	10/17/18			Baker	x	x	x	x	x						(661) 747-4567	cassmoreno525@yahoo.com	8402 Maple Grove Ln, Bakersfield CA 93312
Melissa Castro	10/22/18			Temp Sales						x					(661) 304-8696	lulveecastros@yahoo.com	232 Holtby Rd, Bakersfield CA 93304
Megan Steiber	11/06/18			Temp Sales						x					(661) 332-1822	megan.steiber@yahoo.com	3217 Corvallis Ct, Bakersfield CA 93309
Ashley Manriquez	11/09/18			Temp Sales						x					(661) 868-9247	ashley_manriquez13@yahoo.com	10511 Petalo Dr, Bakersfield CA 93311
Roxanne Luevano	11/17/18			Temp Sales						x					(661) 432-9054	snuggeiz01@yahoo.com	724 Quantico Ave, Bakersfield CA 93307
Jesus Gomez	11/23/18			Temp Support						x					(661) 497-8351		829 Lewis Court, Wasco CA 93280
Madison East	11/23/18			Temp Sales			x								(661) 900-3620	maddygirl0515@gmail.com	12614 Trackside Dr, Bakersfield CA 93312
Sierra Arriola	11/23/18			Temp Sales						x					(661) 742-5197	sierra.arri@gmail.com	11626 Indian Hawthorne St, Bakersfield CA 93311
Sophie Rosander	12/01/18			Baker						x					(661) 333-7211	sophiemae1313@icloud.com	6114 Ozark Mountain Dr, Bakersfield CA 93314
Ezequiel Vielma Camacho	01/06/19			Janitorial						x						zqvielma@gmail.com	3105 California Ave, Bakersfield CA 93304
Shannon Scharf	02/09/19			Sales											(661) 717-4718	scharfshannon@yahoo.com	11815 Hannah Denise Ave, Bakersfield CA 93312
Mercedes Westmoreland	03/11/19			Baker											(213) 808-7146	menue423@gmail.com	6324 Ringsdale Ct, Bakersfield CA 93313
Alejandro Corteras	05/21/19			Baker/Deco	x	x									52 (429) 105-6806	ddtam_9394@outlook.es	230 Vernal Pl, Bakersfield CA 93304
Kamry Gonzalez	06/21/19			Sales											(661) 332-6491	gonzalezkamry@yahoo.com	1416 Duke Dr, Bakersfield CA 93305
Sierra Sloss	07/26/19			Sales												krispykremelady@gmail.com	3910 Four Seasons Ct, Bakersfield CA 93313
Shannon Perkins	07/27/19			Sales											(661) 369-2896	sperrkins1205@gmail.com	6809 Randall St, Bakersfield CA 93308
Erik Figueroa	09/19/19			Baker											(661) 573-5213	erikfigueroa@yahoo.com	4709 Buckley Way, Bakersfield CA 93309
Audrey Lucero	09/28/19			Sales											(661) 314-5610	audreygrielle@cloud.com	6528 Mohawk St, Bakersfield CA 93308
Jersey Marquez	01/21/20			Sales		x	x								(661) 302-3492	jersey.m@icloud.com	4420 Columbus St, Bakersfield CA 93306
Dallas Gonzalez	01/23/20			Baker		x	x								(661) 630-9144	gdallas683@gmail.com	2321 Cullen Ct Apt C, Bakersfield CA 93314

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Tastries Employee List

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Employee Name	Start	Current	Principal	Role	2022	2021	2020	2019	2018	2017	2016	2015	2014	2013	Phone	email	Address
Catharine Miller	04/21/20	FT	Manager	Manager	x	x	x								(661) 549-5530	cm.sparklyn4jesus@gmail.com	11506 Finsbury Ct, Bakersfield CA 93312
Alexis Cardenas	05/12/20		Baker	Baker			x	x							(661) 778-7581	lexiboodelano@gmail.com	6109 S H St Apt D, Bakersfield CA 93304
Stephanie Hall	06/25/20		Decorator	Decorator			x									stephanie.hall3125@gmail.com	4512 Polo Club Dr, Bakersfield CA 93312
Avelina Vasquez	07/03/20		Baker	Baker		x	x									avievas@tejontribe.net	4704 Half Dome Way, Bakersfield CA 93304
Victoria Weller	07/11/20		Decorator	Decorator			x									wveller3@gmail.com	7217 Elias Ave, Bakersfield CA 93308
Andre Ortiz	08/05/20		Support	Support		x	x									andre92ortiz@yahoo.com	3708 Apache Ave, Bakersfield CA 93309
Jordan Thomas	09/10/20		Decorator	Decorator		x	x									jetlefty@gmail.com	9112 Autumn Sunset Dr, Bakersfield CA 93311
Marissa Hernandez	09/10/20		Sales	Sales			x									mlhernandez9310@gmail.com	9500 Ceres St, Bakersfield CA 93306
Michael Miller	05/15/20	PT	Support	Support	x	x	x									mike.millernet@gmail.com	11506 Finsbury Ct, Bakersfield CA 93312
Lorena Chavez	11/11/20	FT	Decorator	Decorator	x	x	x									lorenachavez48@gmail.com	1868 Soledad Ave, Wasco CA 93280
Madelyn Verdel	04/13/21		Sales	Sales		x										mrverdel@icloud.com	337 Berry Meadow Way, Bakersfield CA 93308
Alexa Oberg	05/29/21		Sales	Sales		x										alexaoberg12@gmail.com	810 Jacob Creek Dr, Bakersfield CA 93314
Keirstyn Tyler	06/01/21		Sales	Sales		x										keirstyntylert22@yahoo.com	10108 Revere Beach Dr, Bakersfield CA 93314
Nyomi Salomone	06/03/21		Baker	Baker		x										nyomibaker10@gmail.com	25756 Hart Creek Dr, Keene CA 93531
Jessica Beltran	06/16/21		Sales	Sales		x										jessicabeltrann@icloud.com	2002 College Dr, Delano CA 93215
Vivian Bell	06/27/21	PT	Sales	Sales	x	x										gottalivelice@gmail.com	2830 Spruce St, Bakersfield CA 93301
Rylie Morton	07/30/21	Maternity	Sales	Sales	x	x										mortonrylie@yahoo.com	6600 White Ln Apt 20, Bakersfield CA 93309
Isabel Rios	12/21/21	PT	Sales	Sales	x											craftycousin1@gmail.com	3405 Shiloh Ranch Rd, Bakersfield CA 93306
Erkica Renuk	01/08/22	PT	Sales	Sales	x											erikarenuk@yahoo.com	11014 Vista Ridge Dr, Bakersfield CA 93311
Marley Zerr	01/13/22		Temp Sales	Temp Sales	x											kittysaurusrex2003@gmail.com	10219 Pinnacle Ridge Ave, Bakersfield CA 93311

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Case #
BCV-18-102633
Exhibit 231

EXHIBIT

231

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231-001



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Faith. Hope. Love. The greatest of these is love.
1 Corinthians 13:13

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Lastries

Bakery Boutique & Cafe

Wedding & Celebration Cakes
Wedding Cake Tastings
Cupcakes and Muffins
Event Coordinating
Decorated Cookies
Gourmet Cookies
Creative Touch
Linen Rentals
Dessert Bars
Party Room

"I know the plans that I have for
you" ...Says the Lord, "To give you hope
and a good future". . Jer. 29:11

Document received by the CA 5th District Court of Appeal.

Bride



Lasstries

bakery · boutique · events

Groom

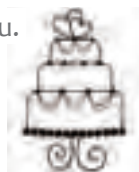


Dept.: J
Case #
BCV-18-102633

Exhibit 5

exhibitsticker.com

Some of our traditions and rituals are so old we have forgotten the reasons behind them. Ritual and traditions, though, are an important part of every culture. The wedding ceremony itself is one of our culture's oldest and most significant rituals. The sacrament of marriage was ordained by God and represents the depth of love God has for each of us. "As a bridegroom rejoices over his bride, so will your God rejoice over you." Is 62:5 Taking vows, making public declarations, and serving your guests and each other are all important parts of our culture's wedding ritual. You will spend a lot of time and money preparing to perform these rituals. Understanding the meaning behind each one will make your wedding day even that much more meaningful and memorable for both of you.



The Wedding Cake



Many engaged couples spend hours searching for the right cake for their special celebration. But, do you know that as we enjoy the variety of wedding cakes available to us now, these cakes have a long deep history? The number of tiers, the color of the cake, the cake cutting and the existence of wedding cakes comes from a carefully planned longstanding tradition dating back to Roman and Medieval times. For centuries The Wedding Cake has often been the centerpiece of the wedding, typically sitting in a place of honor at the reception.



Helpful Hint: Think about where you want your cake to be placed? What is directly behind the cake that will be in your pictures? Is there enough space for people to gather around as you complete two of the 4 rituals at your reception? Lighting?



Stacking of the Cake

The tradition of stacking the cake represented fertility. Couples would stack as many layers as they could as this symbolized the number of children that they would have.

"So God created man in his own image, in the image of God he created him; male and female he created them. And God blessed them. And God said to them,

'Be fruitful and multiply and fill the earth.'" Genesis 1:27-28

So how many tiers would you like your wedding cake to be? ____ ☺



The Creative Custom Design

It is our desire to create a unique cake that captures your theme, personality, colors and taste blended together in a way that expresses the simplicity of you as a couple. So... What are your favorite 4 flavors of cake? ☺

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DFEH00091

The theme of your wedding is the picture you see in your minds eye when you close your eyes and envision one of the most life changing events you will ever have. For some it is simply seeing your future spouse for the first time on your wedding day. For others it is the décor and colors that set the tone and mood for the celebration. Wedding colors are an important part of setting the theme and tone for your ceremony and reception.



What colors are you thinking about for your wedding? _____

What color would you like your wedding cake to be? _____

Do you know what shape you would like your cake? _____

“Then the LORD God said, 'It is not good that the man should be alone; I will make him a helper fit for him.' ... So the LORD God caused a deep sleep to fall upon the man, and while he slept took one of his ribs and closed up its place with flesh. And the rib that the LORD God had taken from the man he made into a woman and brought her to the man.” Genesis 2:18–25



If you have a picture of your cake email it to us now at Tastriesbakery@gmail.com and we will print it out a use it for inspiration. If you see a cake in the bakery that you like, let one of the girls at the front desk know and they will take a picture and print it for you.



Making the Magical Cut

As with all wedding traditions, cutting your first slice of wedding cake together is meant to represent something. Do you know what it represents? Do you know why you have that fancy silver knife and cake server? Do you know why the slicing of the cake is such a popular photo opportunity? Do you plan to smash that first slice of cake into the face of your new spouse? Perhaps once you learn more about this tradition, you'll re-think that plan...



“Be devoted to one another in love. Honor one another above yourselves.” Romans 12:10

Cutting your wedding cake together, hands together on the knife, is the first domestic act you will perform together. You have ordered a large, beautiful cake, or maybe a smaller cake with the perfect dessert bar big enough to serve all of your family and friends. Just as you will offer hospitality to friends and family in your new home together, cutting and serving your cake as husband and wife is the first act of hospitality you will perform together. It is a ceremonial representation of the hospitality you will show to others, together as a new family unit.



"But at the beginning of creation God 'made them male and female.' For this reason a man will leave his father and mother and be united to his wife, and the two will become one flesh.' So they are no longer two, but one. Therefore what God has joined together, let man not separate." Mark 10:6-9





Helpful Hint: Before the celebration, be clear and specific on where your cake will be placed.

Let us know if you would like a stand for your cake. A cake stand is an inexpensive way to “add a layer” or height to your Wedding Cake. Do you think you are interested in a stand? _____ Many photographers take pictures of the cake being set up, the cake with the guests gathered around, and the moment you make your magical cut and feed each other for the first time as man and wife. Giving consideration to the background, lighting and visibility of your wedding cake will make these portraits extend these memories for a lifetime.



The Groom's Cake

Early American weddings had groom's cakes and many weddings have revived this tradition of this cake to showcase the groom's hobbies, individual taste, and even their favorite sports teams. They are usually chocolate to contrast the actual wedding cake, although any flavor or design is acceptable. Recently some newer trends have shown up:



- The Half and Half Wedding cake: Half of the cake is decorated as a beautiful white wedding cake and the other half is a delectable chocolate design or groom themed cake.
- The Grooms cake for the rehearsal dinner: A cake totally designed by the bride (secretly) as a gift to her future husband and a surprise for him at the rehearsal dinner.

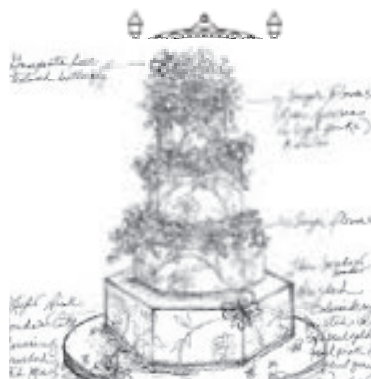


The Gift of Hospitality

A wedding reception is all about hospitality. We sometimes forget that wedding guests are just that - guests. They are guests who are witnesses to, and participants in, one of our most sacred traditions. Because they have honored us by playing important roles in our lives, and by agreeing to participate in our wedding ceremony, it is our obligation to honor them in return with hospitality after the ceremony is complete. In the past, the bride and groom would send guests home with a piece of their wedding cake similar to a wedding favor, later guests were given a little memento; something like flower seeds, mints or m&ms wrapped in a little piece of tulle with a matching ribbon. That tradition has evolved into treats being taken home. Some couples have chosen a personalized cookie with the bride and grooms initials or Thank You written on it and tied in a little bag with a wedding color ribbon. Some have chosen to have little boxes at a dessert bar with a thank you note for the guests to choose treats to take home with them...all of these are examples of appreciation to your guests for taking the time to spend the day celebrating you becoming husband and wife. Always remember that the wedding reception is your way of thanking your guests.



“Therefore a man shall leave his father and his mother and hold fast to his wife, and they shall become one flesh.” Genesis 2:24



DFEH00094

Tastries

bakery · boutique · events

Design Standards

Is it lovely, praiseworthy, or of good report?

Is this design based on godly themes such as the idea of peace, freedom, kindness, love, respect, happiness, joy, goodness or does the design bring to mind feelings of fear, obsession, sadness, and bondage? Our cakes are a reflection of our business and speak volumes when sitting center stage.

All cakes have to meet the Tastries Design Standards:

- Look as good as it tastes, and taste as good as it looks 😊
- Beautiful and balanced: size is proportional to design
- Complimentary colors: color palettes are complimentary; work with design
- Appropriate design complimenting theme of celebration
- Themes that are positive, uplifting and in line with the intent of a celebration of someone or something.
- We prefer to make cakes that would be rated PG or G

Cakes that will **not** meet Tastries Design Standards:

- No cake or cookies depicting marijuana or any other drugs with the exception of nurse or doctor appreciation or medical field related gifts.
- No cake or cookies depicting alcohol or drunkenness.
- No cake or cookies depicting anything derogatory.
- No cake or cookies depicting witches, ghosts, satanic or demonic representations or gore.
- Wedding cakes must not contradict God's sacrament of marriage between a man and a woman.

Our designers are happy to work with you to design a custom cake that meets our criteria for what we are able to offer at Tastries!

Philippians 4:8 says, "... whatsoever things are true, whatsoever things are honest, whatsoever things are just, whatsoever things are pure, whatsoever things are lovely, whatsoever things are of good report;

if there be any virtue; and if there be any praise, think on these things."

Thank you,

Cathy



Cake Flavors

- Chocolate Fudge
- Swiss Chocolate
- Very Vanilla
- Wedding White
- Sensational Strawberry
- Sweet Lemon
- Sprinkle
- Sprinkle Cookie Crumble
- Chocolate Cookie Crumble
- Chocolate Caramel
- Vanilla Caramel
- Princess Pink Velvet

Gourmet Flavor + \$10

- Banana Bonanza* +nuts + \$5
- Black Forest*
- Carrot*
- Cherry Almond*
- German Chocolate*
- Italian Wedding Cake*
- Marble (Any 2 Flavors)*
- Mocha*
- Pink Champagne*
- Pink Passion*
- Pumpkin Spice*
- Royal Red Velvet*
- Coconut Cake



Fillings & Frostings

- Chocolate Fudge Buttercream
- Milk Chocolate Buttercream
- Velvety Vanilla Buttercream
- Lactose Free Vanilla Icing
- Snickers Doodle Buttercream
- Sprinkle Buttercream
- Luscious Lemon Buttercream
- Salted Caramel Buttercream
- Organic peanut Butter Buttercream
- Almond Buttercream
- Mocha Buttercream

Gourmet Flavor + \$10

- Strawberry Buttercream
- Berry Raspberry Buttercream
- Bustin' Out Blueberry Buttercream
- Creamy Cream Cheese Buttercream
- Chocolate Cream Cheese Buttercream
- German Chocolate
- Chocolate Cookie Crumble Buttercream
- Bavarian Cream
- Chocolate Hazelnut Buttercream
- Butterfinger Crunch Buttercream
- Coconut Cream
- Fresh berries when in season*





Layered Cake Stands



7 cake tiered stand



4 cake tiered stand



4 tiered stand



5 cake tiered stand

CONFIDENTIAL

CM-0914

RA.2014

004-015

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If you choose to book with us today and “Save the Date”, you will receive a sweet treat as a gift from us.
If you would prefer to wait and think about it a little longer, we will put your order in the pending file
and wait to hear from you. 😊

The second part of the cake cutting tradition involves the husband and wife feeding each other a piece of the cake they’ve just cut together. This too, is a very important ceremonial act. When the husband takes a piece of cake and feeds his wife, he is showing the world how he will take care of her. It is a ceremonial representation of his intention to provide food for his wife and his family. Likewise, when the wife feeds her husband, she is also ceremonially showing everyone gathered how she will take care of her husband, and provide for him as well. Before The Wedding Cake, the Romans used bread loaves were used and the groom would break the bread over his brides head hoping for lots of crumbs, showing the many blessings they would have together.



To Smash or not to smash... HMMM? That is the Question?

Maybe consider the hours of preparation, the desire to be the most beautiful handsome you have ever been in your life, perhaps this should be thought through..
but at least it isn’t as bad as having bread crumbs all over you!



The ritual has nothing to do with who makes the money or who does the cooking. Feeding each other the first bite of their Wedding Cake is a visual representation of the vows the couple made to each other only moments before the cake was cut. It is your first opportunity to provide for each other – ritually, yes, but no less importantly.



Helpful Hint: Even if you think you're a pro at cutting cakes—maybe your birthday cake?—here are your special instructions to make the first cut. You wouldn't want to place the knife in the wrong spot and cause your delicate tower to topple over. We recommend you cut from the bottom tier, but at Tastries, when you purchase your custom cake or dessert bar from us, you will receive a 6” top tier replica for your One Year Anniversary for \$20, so you can cut the top if you would like. Traditionally, the bottom tier is used for the Magical Cut but that was so the top tier could be saved. Which tier would you like to cut? Top or Bottom? (Circle one) This might sound obvious, but remember to use the knife, not the server, for the quickest and cleanest cut. Now the groom places his hand over the bride’s hand to help her slice the first piece. Now Slide the slice onto the server and place it on a plate. Use the knife to cut the slice into two small pieces. You can each take your pieces from the same plate for the ceremonial feeding. Don’t forget to have your servers place a slice of cake on your table from each of the tiers!

Smile & Say “Tastries”

Along with the first dance and bouquet toss, this charming tradition of cutting the cake is one of those photo opportunities that graces every wedding album. It provides both a fabulous photo opportunity and symbolizes your first joint task as newlyweds.



Fun Shapes Take the Cake



Basic: One Layer with Supercream Frosting and border on top and bottom
Standard: Two Layers with Filling, Buttercream Frosting and borders
Signature: Two Layers with Filling, Buttercream or Fondant Frosting and decorations

The Heart...



Basic: \$15 Serves 6
Standard: \$25
Signature: \$35
Serves 14



Basic: \$30 Serves 14
Standard: \$45
Signature: \$75
Serves 28



Basic: \$65 Serves 28
Standard: \$75
Signature: \$140
Serves 56



Basic: \$80 serves 36
Standard: \$100
Signature: \$190
Serves 74



Serves 42
\$140



Serves 90
\$300



Serves 164
\$525

The Hexagon...



Basic: \$18 Serves 6
Standard: \$30
Signature: \$35
Serves 12



Basic: \$35 Serves 12
Standard: \$45
Signature: \$75
Serves 26



Basic: \$70 Serves 20
Standard: \$65
Signature: \$95
Serves 40



Basic: \$80 Serves 35
Standard: \$100
Signature: \$190
Serves 70

Serves 38
\$140



Serves 78
\$265



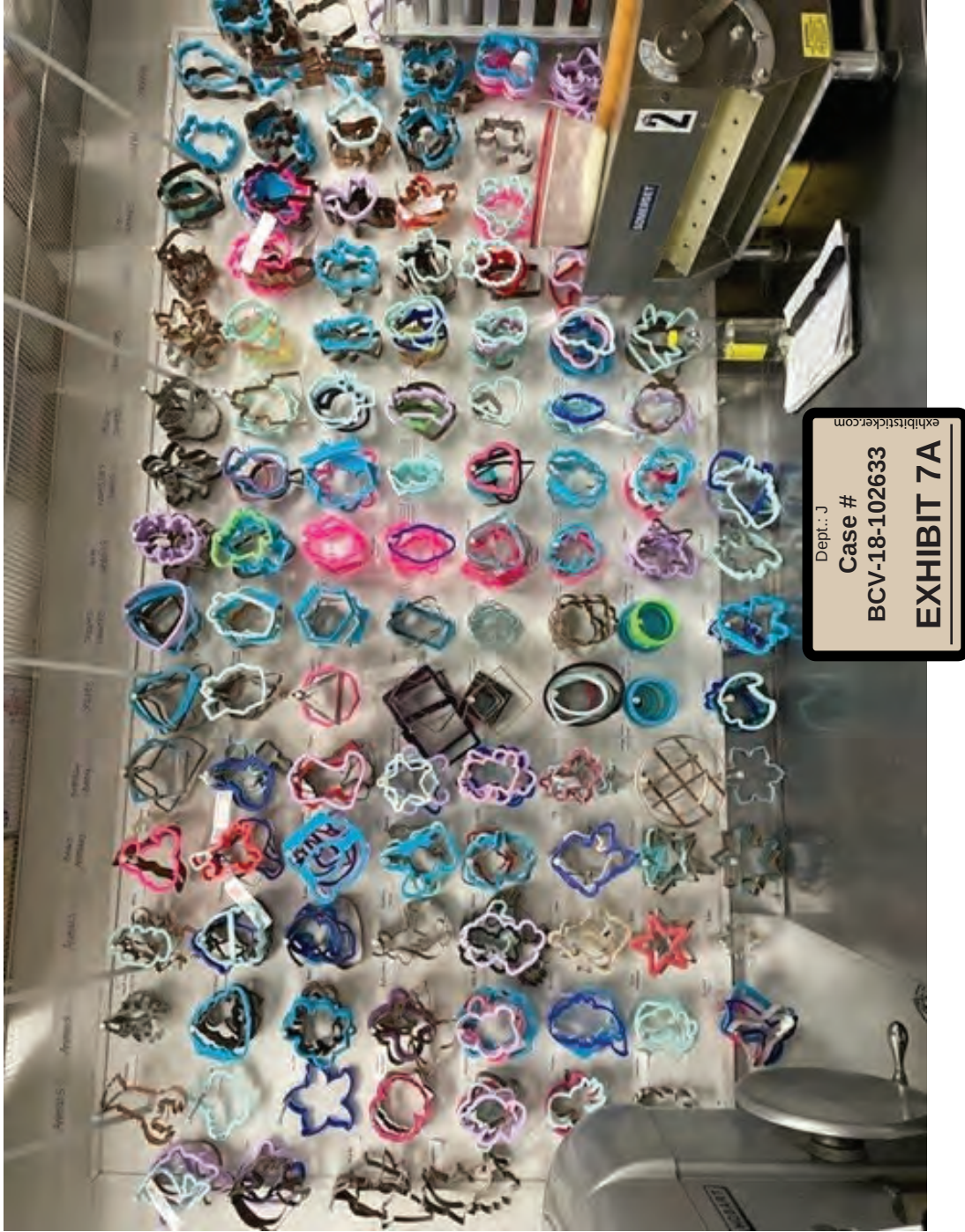
Serves 148
\$525



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CM-0921

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007A-001



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CM-0949

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007B-013



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CM-0950

RA.2020

007B-014



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CM-0951

RA.2021

007B-015



Document received by the CA 5th District Court of Appeal.

CM-0953



Document received by the CA 5th District Court of Appeal.

CM-0960

RA.2023

007B-024



Document received by the CA 5th District Court of Appeal.

CM-0966

RA.2024

007B-030



Document received by the C.A. 5th District Court of Appeal

CM-0967

RA.2025

007B-031



Document received by the CA 5th District Court of Appeal.

CM-1070

RA.2026

007B-134



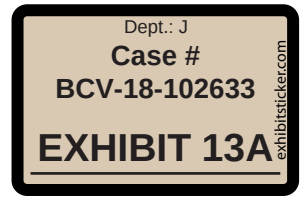
Document received by the CA 5th District Court of Appeal.

CM-0988

RA.2027

007B-052

***Ex. 13A_Top Tier
Crumb Coat***



***This trial exhibit is a
video exhibit and is
available from
Respondents' counsel
upon request.***

Document received by the CA 5th District Court of Appeal.

Ex. 13D_Smooth Coat

***This trial exhibit is a
video exhibit and is
available from
Respondents' counsel
upon request.***

Ex. 13E_Smoothing Buttercream

***This trial exhibit is a
video exhibit and is
available from
Respondents' counsel
upon request.***

Ex. 13F_Stacking

***This trial exhibit is a
video exhibit and is
available from
Respondents' counsel
upon request.***



Document received by the CA 5th District Court of Appeal.

Ex. 14A_Decoration

***This trial exhibit is a
video exhibit and is
available from
Respondents' counsel
upon request.***

Ex. 14B_Decoration

***This trial exhibit is a
video exhibit and is
available from
Respondents' counsel
upon request.***



Document received by the CA 5th District Court of Appeal.



Eileen Rodriguez-Del Rio is with Jessica Camacho and 42 others at Tastries Bakery, Bakersfield.

August 26, 2017 - Bakersfield, CA

Saturday, August 26, 2017 at 1:13 PM
I go to sign up for tasting and choose our wedding cake. The
up the process. Well this rude ass person says I will make your
order but I don't condone same sex marriages and will have no part in this process. Oh but you
want to take my order and give it another bakery so that bakery can do it. The rude person is also
the owner of the place. She don't condone same sex marriages so refused to make our wedding
cake and set up our order. She wanted all our information to send to another bakery so they
could make it. #discrimination#mustbeadonaldtrumpsupporter#rude!



BAKERY
Tastries Bakery, Bakersfield

55

53 Comments 8 Shares

Document received by the CA 5th District Court of Appeal.

EXHIBIT

553A

Dept.: J

Case #

BCV-18-102633

EXHIBIT 553A



Eileen Rodriguez-Del Rio is with Jessica Camacho and 42 others ...
at Tastries Bakery, Bakersfield.

August 26, 2017 · Bakersfield, CA · 🌐

So we go to this bakery a week ago to sign up for tasting and choose our wedding cake. The owner met with us today to set up the process. Well this rude ass person says I will make your order but I don't condone same sex marriages and will have no part in this process. Oh but you want to take my order and give it another bakery so that bakery can do it. The rude person is also the owner of the place. She don't condone same sex marriages so refused to make our wedding cake and set up our order. She wanted all our information to send to another bakery so they could make it.
#discrimination#mustbeadonaldtrumpsupporter#rude!



DFEH00235

Document received by the CA 5th District Court of Appeal.

Cathy's Creations, Inc.

3665 Rosedale Hwy.
Bakersfield, CA 93308
(661) 322-1110

6/30/2021

City of Bakersfield
Treasury Division
PO Box 2057
Bakersfield, CA 93303

Re: Cathy's Creations, Inc.
Business license renewal for Creative Touch
Certificate Number: 128381

We have decided to discontinue business activity under Creative Touch. Gross receipts for this account in 2020 was zero. Please remove Creative Touch as an active license holder.

A copy of the license renewal notice is attached for your information.

Feel free to contact us by mail at the address above or call 661-221-1787 if you have any questions.

Thank you,

Mike Miller
Business Advisor for Cathy's Creations, Inc.

Document received by the CA 5th District Court of Appeal.

* POST CONSPICUOUSLY*

CITY OF BAKERSFIELD

BUSINESS TAX CERTIFICATE

* NON-TRANSFERABLE

RENEW WITHIN 30 DAYS AFTER EXPIRATION TO AVOID PENALTY

Business name .: TASTRIES

Location address 3665 ROSEDALE HWY

Lic Nbr/Class .: 22 00128379 BAKERIES

Issue date .: 6/29/21 Expiration date .: 6/30/22

License comment: BAKERY AND BOUTIQUE

TASTRIES

3665 ROSEDALE HWY

BAKERSFIELD CA 93308

Owner/Officer

CATHY'S CREATIONS INC

MILLER, CATHARINE



BUSINESS TAX CERTIFICATE IS HEREBY GRANTED. LICENSEE IS TO COMPLY WITH ALL LAWS AND ORDINANCES. ISSUANCE OF THIS LICENSE DOES NOT CONSTITUTE AUTHORIZATION TO

RA.2039

Document received by the CA 5th District Court of Appeal.
Tastries RPD Nos. 45 & 46

CM-3588

ENVIRONMENTAL HEALTH PERMIT

KERN COUNTY PUBLIC HEALTH SERVICES DEPARTMENT

ENVIRONMENTAL HEALTH SERVICES DIVISION

2700 M ST SUITE 300 BAKERSFIELD CA 93301

(661) 862-8740 <http://kernpublichealth.com/environmental-health/> e-mail: eh@kerncounty.com

REGULATED FACILITY:

TASTRIES BAKERY - TFF
3665 ROSEDALE HWY
BAKERSFIELD CA 93308

OWNER(S) OF RECORD:

CATHARINE MILLER / CATHY'S CREATIONS

FA ID: FA0038418

General Health Program

TF02 - TEMPORARY FOOD FACILITY

Permit

0026286

Additional Information

Expiration: 6/30/2022

Permit Issued: 1/25/2022

Brynn Carigan

Public Health Services Director

This ENVIRONMENTAL HEALTH PERMIT is issued to the owner(s) and establishment shown above subject to compliance with all applicable laws and regulations. Permit is valid unless revoked or suspended for violation of applicable laws and regulations.

Temporary Food Facility

PERMIT IS NON-TRANSFERABLE AND MUST BE PROMINENTLY DISPLAYED IN THE PLACE OF BUSINESS
Document received by the CA 5th District Court of Appeal.
Tastries RPD Nos. 45 & 46

CM-3583

RA.2040

ENVIRONMENTAL HEALTH PERMIT

KERN COUNTY PUBLIC HEALTH SERVICES DEPARTMENT
ENVIRONMENTAL HEALTH SERVICES DIVISION
2700 M ST SUITE 300 BAKERSFIELD CA 93301

(661) 862-8740 <http://kernpublichealth.com/environmentalhealth/> e-mail: eh@kerncounty.com

REGULATED FACILITY:

CATHY'S CREATIONS "TASTRIES"
3665 ROSEDALE HWY
BAKERSFIELD CA 93308

OWNER(S) OF RECORD:

CATHARINE MILLER / CATHY'S CREATIONS II
FA ID: FA0008305

General Health Program

FOOD MARKET

Permit #

0008361

Additional Information

COPY

Permit Issued: 1/11/2013

Brynn Carrigan
Public Health Services Director

This ENVIRONMENTAL HEALTH PERMIT is issued to the owner(s) and establishment shown above subject to compliance with all applicable laws and regulations. Permit is valid unless revoked or suspended for violation of applicable laws and regulations.

PERMIT IS NON-TRANSFERABLE AND MUST BE PROMINENTLY DISPLAYED IN THE PLACE OF BUSINESS
Document received by the CA 5th District Court of Appeal.
Tastries RPD Nos. 45 & 46
CM-3589

Kern County Environmental Health Services Department 2700 M Street, Suite 300, Bakersfield, CA 93301 Phone (661) 862-8740 Fax (661) 862-8701					Date 02/04/2022	Total Score 100.0	Grade A
Business Name CATHY'S CREATIONS "TASTRIES"			Mailing Address 3665 ROSEDALE HWY BAKERSFIELD CA 93308		PE FM10	FA FA0008305	
Business Address 3665 ROSEDALE HWY BAKERSFIELD, CA 93308					Activity Time 42	PR PR0048250	
Purpose of Visit X Routine Inspection			Results of Inspection				
Inspection of Closed Facility			No Violations Observed		Administrative Review		Permit Approved
Reinspection			Complaint allegations not observed		Inactivate Permit		Permit Suspended
Complaint			Previous Violations Corrected		Voluntary Condemnation		Permit Reinstated
Embargo Impound Training							

"COS" = Corrected on site at the time of inspection
"Repeat" = Repeat Violation
"N/O" = Not observed at time of inspection
"N/A" = Does not Apply

Section 1. FOODBORNE ILLNESS RISK FACTORS -- MAJOR (point values for repeat violations are doubled)

An "X" in the major column indicates the violation poses an immediate threat to public health and must be corrected immediately.

Points	Major	COS	Repeat	N/O	N/A	Item
Holding Temperatures						
5						1 Cold holding of potentially hazardous food
5						2 Hot holding of potentially hazardous food
5						3 Cooling of potentially hazardous food
5						4 Reheating of potentially hazardous food
Cooking Temperatures						
5						5 Cooking of raw animal or raw plant food.
Food Handler Health and Hygiene						
5						6 Hands clean and washed as required.
5						7 Employee personal hygiene, health, open sores, cuts.
5						8 Employee uses utensils for ready-to-eat food.
5						9 Handwashing sink - soap and towels.
5						10 Handwashing sink - warm water, accessible.
5						11 Demonstration of knowledge
Equipment and Utensils						
5						12 Food Contact surfaces clean, sanitized as required.
5						13 Proper sanitizing method, residual, temp., contact time
5						14 Hot and cold water available - less than 110° F.

Points	Major	COS	Repeat	N/O	N/A	Item
Approved Source						
5						15 Food obtained from approved source.
5						16 Records, shellfish tags maintained.
5						17 After served, food is not re-served or reused.
Protection from Contamination						
5						18 Vermin infestation.
5						19 Food protected from cross contamination.
5						20 Food protected from environmental contamination.
5						21 Food free from contamination, adulteration.
5						22 Chemicals properly packaged, used, labeled, stored.
5						23 Liquid waste disposal
5						24 Food voluntarily condemned and destroyed
Imminent Health Hazard - Immediate Closure						
26						25 Inadequate or nonfunctioning refrigeration equip.
26						26 No operable toilet facilities.
26						27 Sewage overflow at facility.
26						28 No potable, pressurized, hot and cold water supply.
26						29 Severe vermin infestation.

Score
 0

Section 2. FOODBORNE ILLNESS RISK FACTORS -- MINOR

An "X" in the minor column indicates the violation poses a risk to public health and shall be corrected by the date specified.

Points	Minor	COS	Repeat	N/O	N/A	Item
Holding Temperatures						
3						30 Cold holding of potentially hazardous food
3						31 Hot holding of potentially hazardous food
3						32 Cooling of potentially hazardous food
Food Preparation						
3						33 Thawing of frozen potential hazardous food.
3						34 Preparation of potentially hazardous food.
3						35 Food prepared in approved area.
Food Handler Health and Hygiene						
3						36 Employee personal hygiene, health, open sores, cuts.
3						37 Approved handling of ready-to-eat food.
3						38 Handwashing sink - soap and towels.
3						39 Handwashing sink - warm water, accessible.
Equipment and Utensils						
3						40 Food contact surfaces clean, sanitized as required.

Points	Minor	COS	Repeat	N/O	N/A	Item
Equipment and Utensils Cont.						
3						41 Sanitizer concentration and supplies.
3						42 Wiping cloths.
3						43 Critical sinks present, accessible, good repair.
3						44 Exhaust hoods/filters present, cleaned, good repair.
Protection from Contamination						
3						45 Food protected from cross contamination.
3						46 Food protected from environmental contamination.
3						47 Facility free of vermin infestation.
3						48 Chemicals properly packaged, used, labeled, stored.
3						49 Observed eating, drinking or tobacco use.
3						50 Premises clean, free of litter, rubbish, used articles.
Other Factors						
3						51 Person in charge present.
3						52 Valid food safety certification/Demonstration of knowledge.

Score
 0

Section 3. NON-CRITICAL FACTORS

An "X" in the NC column indicates the violation poses a non-critical risk to public health and shall be corrected by the next inspection date.

Points	NC	COS	Repeat	N/O	N/A	Item
1						53 Packaged food, self - service bulk, properly labeled.
1						54 Oyster warning signs required for raw oysters.
1						55 Ready - to - eat food less than thoroughly cooked notifica
1						56 Accurate probe thermometer required for testing PHF.
1						57 Accurate thermometer required for each refrigeration unit.
1						58 Chemical test kit for monitoring sanitizing solution.
1						59 Employee change/storage facilities present/properly used.
1						60 Equipment maintains holding temperatures.
1						61 Equipment/Utensils approved, cleaned, good repair.
1						62 Floors, walls, ceilings approved, clean, good repair.
1						63 Lighting provided as required and/or shielded.
1						64 Premises clean, free of litter, rubbish, used articles.

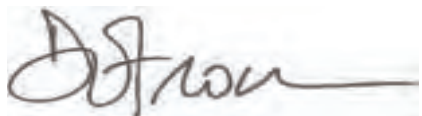
Points	NC	COS	Repeat	N/O	N/A	Item
1						65 Toilet facilities present, equipped, maintained.
1						66 Facility free of vermin infestation.
1						67 Facility equipped to prevent harborage of vermin.
1						68 Evidence of eating, drinking, or tobacco use.
1						69 Hot water between 111F and 119F.
1						70 Plumbing fixture - backflow protection device.
1						71 Plumbing fixture - air gap into approved receptor.
1						72 All liquid waste disposed through a plumbing system.
1						73 Ingredients contain trans fat above 1.5 grams.
1						74 Nutrition labeling present or available upon request.
1						75 Signs - handwshing, no smoking, inspection report.
1						76 Environmental Health Permit posted.

Score
 0.0

Tastries RPD Nos. 45 & 46

CM-3590

Business Name						FA	Activity Date
CATHY'S CREATIONS "TASTRIES"						FA0008305	02/04/2022
Major	Minor	COS	Repeat	Non	Item	Comments/Observation/Corrective Actions. An "X" in the major column indicates the violation poses an immediate threat to public health and must be corrected immediately. An "X" in the minor column indicates the violation poses a risk to public health and shall be corrected by the date specified. An "X" in the non-critical column indicates the violation poses a non-critical risk to public health and shall be corrected by the next inspection	
						Must Comply By:	

Signature of EHS	Signature of Recipient
	
Franck Douazale	Catharine Miller
Tastries RPD Nos. 45 & 46	owner
	CM-3591

CALIFORNIA STATE BOARD OF EQUALIZATION

SELLER'S PERMIT



ACCOUNT NUMBER

01/09/2013 SR DFB 102-333400

TASTRIES

CATHY'S CREATIONS

3665 ROSEDALE HWY

BAKERSFIELD, CA 93308-6230

NOTICE TO PERMITTEE:
You are required to obey all Federal and State laws that regulate or control your business. This permit does not allow you to do otherwise.

HEREBY AUTHORIZED PURSUANT TO SALES AND USE TAX LAW TO ENGAGE IN THE BUSINESS OF SELLING TANGIBLE PERSONAL PROPERTY AT THE ABOVE LOCATION. THIS PERMIT IS VALID ONLY AT THE ABOVE ADDRESS.

THIS PERMIT IS VALID UNTIL REVOKED OR CANCELED AND IS NOT TRANSFERABLE. IF YOU SELL YOUR BUSINESS OR DROP OUT OF A PARTNERSHIP, NOTIFY US OR YOU COULD BE RESPONSIBLE FOR SALES AND USE TAXES OWED BY THE NEW OPERATOR OF THE BUSINESS.

Not valid at any other address.

For general tax questions, please call our Information Center at 800-400-7115.

For information on your rights, contact the Taxpayers' Rights Advocate Office at 888-324-2798 or 916-324-2798.

BOE-442-R REV. 15 (2-08)

A MESSAGE TO OUR NEW PERMIT HOLDER

As a seller, you have rights and responsibilities under the Sales and Use Tax Law. In order to assist you in your endeavor and to better understand the law, we offer the following sources of help:

- Visiting our website at www.boe.ca.gov
- Visiting a district office
- Attending a Basic Sales and Use Tax Law class offered at one of our district offices
- Sending your questions in writing to any one of our offices
- Calling our toll-free Information Center at 800-400-7115

As a seller, you have the right to issue resale certificates for merchandise that you intend to resell. Conversely, you have the responsibility of not misusing resale certificates. While the sales tax is imposed upon the retailer,

- You have the right to seek reimbursement of the tax from your customer
- You are responsible for filing and paying your sales and use tax returns timely
- You have the right to be treated in a fair and equitable manner by the employees of the Board
- You are responsible for following the regulations set forth by the Board

As a seller, you are expected to maintain the normal books and records of a prudent businessperson. You are required to maintain these books and records for no less than four years, and make them available for inspection by a Board representative when requested. You are also expected to notify us if you are buying, selling, adding a location, or discontinuing your business, adding or dropping a partner, officer, or member, or when you are moving any or all of your business locations. If it becomes necessary to surrender this permit, you should only do so by mailing it to a Board office, or giving it to a Board representative.

If you would like to know more about your rights as a taxpayer, or if you are unable to resolve an issue with the Board, please contact the Taxpayers' Rights Advocate Office for help by calling toll-free, 888-324-2798 or 916-324-2798. Their fax number is 916-323-3319.

Please post this permit at the address for which it was issued and at a location visible to your customers.

STATE BOARD OF EQUALIZATION
Sales and Use Tax Department

Document received by the CA 5th District Court of Appeal.



California Secretary of State
Electronic Certified Copy

I, SHIRLEY N. WEBER, Ph.D., Secretary of State of the State of California, hereby certify that the attached transcript of 2 pages is a full, true and correct copy of the original record in the custody of the California Secretary of State's office.



IN WITNESS WHEREOF, I execute
this certificate and affix the Great
Seal of the State of California on
this day of January 10, 2022

SHIRLEY N. WEBER, Ph.D.
Secretary of State

Verification Number: KD3985B
Entity (File) Number: C3525303

To verify the issuance of this Certificate, use the Verification Number above
with the Secretary of State Electronic Verification Search available at
bizfile.sos.ca.gov

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**California Secretary of State
Electronic Filing**

FILED
Secretary of State
State of California

Corporation - Statement of Information

Entity Name: CATHY'S CREATIONS, INC.

Entity (File) Number: C3525303
File Date: 01/08/2022
Entity Type: Corporation
Jurisdiction: CALIFORNIA
Document ID: H094881

Detailed Filing Information

1. Entity Name: CATHY'S CREATIONS, INC.
2. Business Addresses:
 - a. Street Address of Principal Office in California: 3665 Rosedale Hwy
Bakersfield, California 93308
United States of America
 - b. Mailing Address: 3665 Rosedale Hwy
Bakersfield, California 93308
United States of America
 - c. Street Address of Principal Executive Office: 3665 Rosedale Hwy
Bakersfield, California 93308
United States of America
3. Officers:
 - a. Chief Executive Officer: Catharine M Miller
3665 Rosedale Hwy
Bakersfield, California 93308
United States of America
 - b. Secretary: Catharine M Miller
3665 Rosedale Hwy
Bakersfield, California 93308
United States of America

Certificate Verification Number: KD3985B

Document ID: H094881

Use bizfile.sos.ca.gov to verify the certified copy.

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California Secretary of State Electronic Filing

Officers (cont'd):

c. Chief Financial Officer:

Catharine M Miller
3665 Rosedale Hwy
Bakersfield, California 93308
United States of America

4. Director:

Catharine M Miller
3665 Rosedale Hwy
Bakersfield, California 93308
United States of America

Number of Vacancies on the Board of
Directors:

0

5. Agent for Service of Process:

Catharine M Miller
3665 Rosedale Hwy
Bakersfield, California 93308
United States of America

6. Type of Business:

Retail Bakery

No Officer or Director of this Corporation has an outstanding final judgment issued by the Division of Labor Standards Enforcement or a court of law, for which no appeal therefrom is pending, for the violation of any wage order or provision of the Labor Code.

By signing this document, I certify that the information is true and correct and that I am authorized by California law to sign.

Electronic Signature Catharine Miller

Use bizfile.sos.ca.gov for online filings, searches, business records, and resources.

Document ID: H094881
Certificate Verification Number: KD3985B
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[REDACTED]

[REDACTED]

Sent from my iPhone

Begin forwarded message:

From: Eileen Del Rio <eileen.delrio@aol.com>
Date: September 6, 2017 at 10:17:42 AM PDT
To: don martin <metrogalleries@yahoo.com>
Subject: Re: Rodriguez/Del Rio Wedding October 7

Hi Don

Thank you

Looking forward to hearing from him.

Thanks again for your quick response.

Eileen Del Rio

Sent from my iPhone

On Sep 6, 2017, at 10:04 AM, don martin <metrogalleries@yahoo.com> wrote:

Good Morning Eileen,
Rick is on vacation this week. He will be back in the gallery this
Friday and contact you the to set up an appointment.

Best,
Don

Don Martin
Metro Galleries . Metro Special Events
MetroMedia . Bakersfield Arts District Foundation

Document received by the CA 5th District Court of Appeal.

Sent from my iPhone

On Wednesday, September 6, 2017, 9:36 AM, Eileen Del Rio
<eileen.delrio@aol.com> wrote:

Hi Rick

We need to set up a meeting before the 16th to pay the remainder of our balance and go over the times etc for our big day.

Can you let us know what is available so we can set up a time to go down there and meet you to finalize.

Thank you

Eileen Del Rio
Mireya Rodriguez

Sent from my iPhone

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