

AJ WEBERMAN pro se

IN THE SUPERIOR COURT FOR THE STATE OF CALIFORNIA FOR THE COUNTY OF LOS ANGELES

STEVEN ROMBOM,

) Case No.: No. SC092414

Plaintiff,

)

vs.

) MOTION FOR CHANGE OF VENUE

AJ WEBERMAN, MARK LEVY, JEWISH DEFENSE

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ORGANIZATION,

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Defendant

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1. Defendant AJ Weberman requests that this action be transferred to the Kings County Supreme Court which is located in Brooklyn, New York, part of Defendants' and Plaintiff's city of residence. Defendant and Plaintiff live and work in New York City. All of the events giving rise to the claim occurred in NYC. A substantial part of Plaintiff's nor Defendants assets cannot be said to be situated in California. Clearly Plaintiff has initiated its action in an improper venue. Plaintiff has a substantial presence in the NYC area. Defendant is an individual with no presence in California. The convenience that a change of venue would accord Defendant far outweighs the lesser inconvenience that such change would present to Plaintiff as the libel proceeding and judgment first originated in New York City. The CCP 492.020 states (a) "Upon the filing of the complaint or at any time thereafter, the plaintiff may apply pursuant to this chapter for a right to attach order and a writ of attachment by filing an application for the order and **writ with the court in which the action is brought.**" The intention here is to define the just venue to litigate a complaint - that venue being the court in which the action was brought. There is nothing stopping Rambam from enforcing his judgment in that court. The California Civil Code Section 1710.35 states "Except as otherwise provided in this chapter, a judgment entered pursuant to this chapter shall have the same effect as an original money judgment of the court and may be enforced or satisfied in like manner. California courts provide that judgments

filed pursuant to the Acts are enforceable in the same manner as judgments in the court where filed." This implies that justice is not always served when one state enforces the laws of another with differing statutes.

2. SECTION 1292-1293.2 California Civil Code states "1292. Except as otherwise provided in this article, any petition made prior to the commencement of arbitration shall be filed in a court having jurisdiction in:

(a) The county where the agreement is to be performed or was made.

(b) If the agreement does not specify a county where the agreement

is to be performed and **the agreement was not made in any county in this state, the county where any party to the court proceeding resides or has a place of business.**

3. Steve Rambam and Alan Weberman are both residents of New York State and do business for New York State. The address listed on Rambam's website pallorium.com is Post Office Box 155 Midwood Station, Brooklyn, N.Y. Alan Weberman lives at 345 East 94th Street NYC.

4. California jurisdiction imposes an unfair burden on defendant. Alan Weberman is unable to afford an attorney in California which would be approximately \$5000 retainer and an additional \$10,000 for an appeal although my attorney in New York, Michael Drobinare, of Brooklyn, New York, is willing represent me for a nominal fee should the case be transferred to Kings County. By keeping this action in California I am

effectively being deprived of counsel.

5. Even if I continued to go pro se the cost of traveling to California would be \$500 airfare plus at least \$200 a night for a hotel. Additionally I do not possess a driver's license and the cost of a taxi would be an additional burden. I am an indigent defendant with a bank balance of approximately \$500 and am at a great legal disadvantage as a pro se defendant, especially in California.

6. By effectively depriving me of the right to counsel this court would be in violation of "CALIFORNIA CONSTITUTION ARTICLE 1 DECLARATION OF RIGHTS SEC. 2. (a) Every person may freely speak, write and publish his or her sentiments on all subjects, being responsible for the abuse of this right. A law may not restrain or abridge liberty of speech or press" unless this court labors under the delusion that this is just a run of the mill action to recover part of a judgment, rather than a transparent attempt to violate my constitutional rights of Free Speech and Free Press through collection law.

7. The sister state law was formulated to prevent debtors from avoiding collection by moving to another state. This is a misuse of the sister state judgment law as I have not moved to California, nor has Rambam. The law is being misused to make it impossible for me to defend myself since the action is on the other side of the United States.

8. The venue of Beverly Hills was cherry picked by the Judgment Creditor as

there exists a certain animosity to garbologists in Beverly Hills California and A.J.

Weberman is the inventor of garbology. Garbology is the science of the study of famous

people's trash and Beverly Hills enjoys the reputation of being the home to many

celebrities. A. J. Weberman is cited in California v Greenwood SUPREME COURT OF THE

UNITED STATES No. 86-684 1988.SCT.2069 , 486 U.S. 35, 108 S. Ct. 1625, 100 L. Ed. 2d

30, 56 U.S.L.W. 4409 May 16, 1988 wherein garbology was legalized.

9. Based upon all of the foregoing and the overwhelming evidentiary showing made,

Defendant respectfully requests that the Court grant its motion to change the trial

venue and to determine that this action be dismissed and tried in a venue where both

parties reside.

Dated this 6th day of April, 2007

AJ WEBERMAN pro se