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Gloria Allred's Response to Defendant Mayor Filner's Motion to Change Venue from San Diego County to Imperial County in the Case that Ms. Allred has Filed on Behalf of Irene McCormack Jackson Against Mayor Filner and the City of San Diego.

We do not believe that venue should be changed from San Diego County to Imperial County in this case. We are confident that an impartial jury can be found in San Diego County.

Mayor Filner is the Mayor of the city of San Diego. This case should be heard in San Diego. The conduct we allege in our lawsuit occurred in San Diego. We allege that Mayor Filner sexually harassed our client Irene McCormack Jackson in San Diego. We believe that the case should be heard and decided by a jury of Mayor Filner's peers who reside in San Diego.

The motion for change of venue from San Diego County to Imperial County is now scheduled for September 16, 2013 at 1:30 PM. I plan to be present and we will oppose Mayor Filner's motion to change venue.

Also, since the Mayor has filed a motion to quash the subpoena for his deposition previously scheduled for August 9th, his deposition will not go forward on that date. His motion to quash will also be heard on September 16, 2013 at 1:30 PM in San Diego Superior Court in Dept. 75, Judge Strauss.

Gloria Allred
Attorney at Law
Representing Irene McCormack Jackson
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