

**Remote Deposition of: Noe Pablo**  
**Jill Mann vs. Las Brisas Pacificas, Inc.**  
**February 3, 2026**

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THE SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN DIEGO

|                               |   |                     |
|-------------------------------|---|---------------------|
| JILL MANN, an individual,     | ) |                     |
|                               | ) |                     |
| Plaintiff,                    | ) |                     |
|                               | ) |                     |
| vs.                           | ) | Case No.24CU015304N |
|                               | ) |                     |
|                               | ) |                     |
| LAS BRISAS PACIFICAS, INC., a | ) |                     |
| California mutual benefit     | ) |                     |
| common interest development   | ) |                     |
| corporation; and DOES 1-20,   | ) |                     |
| inclusive,                    | ) |                     |
|                               | ) |                     |
| Defendants.                   | ) |                     |
| _____                         | ) |                     |

REMOTE DEPOSITION OF

NOE PABLO - PABLO'S LANDSCAPE SERVICES INC.

Tuesday, February 3, 2026

Reported by: Natalie Simon, CSR No. 14375  
Job No. 128613

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COUNTY OF SAN DIEGO

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|                               | ) |                     |
| Defendants.                   | ) |                     |
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The remote deposition of NOE PABLO - PABLO'S LANDSCAPE SERVICES Inc., taken on behalf of the Plaintiff, before Natalie Simon, Certified Shorthand Reporter 14375, for the State of California, commencing at 9:36 a.m., Tuesday, February 3, 2026, via videoconference, Placentia, California.

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APPEARANCES:

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ALSO PRESENT:

JILL MANN

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I N D E X

WITNESS

NOE PABLO

EXAMINATION

PAGE

BY MR. ALEXANDER

6

INFORMATION REQUESTED:

(NONE.)

WITNESS INSTRUCTED NOT TO ANSWER:

(NONE.)

QUESTIONS MARKED:

(NONE.)

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Tuesday, February 3, 2026, 9:36 a.m.

THE STENOGRAPHIC REPORTER: Good morning. My name is Natalie Simon. I am a California Certified Shorthand Reporter and the deposition officer for today's deposition. My CSR license number is 14375.

NOE PABLO - PABLO'S LANDSCAPE SERVICES INC., was called as a witness by and on behalf of the Plaintiff, and having been first duly sworn by the Certified Shorthand Reporter, was examined and testified as follows:

-o0o-

EXAMINATION

BY MR. ALEXANDER:

Q Good morning, Mr. Pablo. My name is Vasko Alexander. I introduced myself off the record very briefly, but let's make it official.

I am counsel for Jill Mann, who is with us today, in a matter called Mann versus Las Brisas, HOA for short. You were subpoenaed for your deposition today. And obviously you have received the subpoena; otherwise, you would not be here. Let me start by

1 asking you first off -- well, the subpoena was issued to  
2 Pablos Landscape Services, Inc.

3 What is your relationship to Pablo's Landscape  
4 Services, Inc.?

5 A I am the owner.

6 Q Are there any other employees at Pablo's  
7 Landscape Services?

8 A Used to be. With the economy, everything is  
9 downhill.

10 Q Okay. I am sorry to here that. You know,  
11 fingers crossed that it is going to pick up again, so  
12 more employees coming your way.

13 Okay. Did you review the subpoena in detail  
14 in preparation for your deposition today?

15 A I did a little. Not in the full extent, but I  
16 feel confident.

17 Q And let me lay some ground work by asking you  
18 a couple of, kind of, foundational questions here or  
19 background questions.

20 Have you been deposed before?

21 A No.

22 Q Have you ever offered trial testimony before?

23 A No.

24 Q Okay. Let me explain the process. It will  
25 make it a little bit easier. I don't anticipate us

1 taking a lot of time today. The first thing I am going  
2 to ask you to do is keep doing what you are doing.  
3 Which is wait for my question and then respond verbally  
4 to my question. Because we have a court reporter with  
5 us today who can only take verbal testimony. So any  
6 body language can't be reflected.

7 So, again, I would ask you to respond not only  
8 with body language, but verbally; is that understood?

9 A Yes, sir. I respond "yes" or "no" with  
10 arguments.

11 Q So that is the second part of it. Which is --  
12 I am not here to cross-examine you. I am not here to  
13 discredit you or anything like that. This is really to  
14 explore what happened in a particular period of time.  
15 And it's essentially an interview, and I am trying to  
16 gather information as to what happened, who was there,  
17 what was said, what was done. So to that end, I am  
18 going to be asking for your best recollection as to the  
19 events that I am going to be asking you about.

20 A Okay.

21 Q And I am going to request that you provide me  
22 your best recollection. And if you have to provide an  
23 estimate on something, that is okay. But I don't want  
24 you to guess.

25 Does that sound fair?

1 A Thank you.

2 Q And you understood the difference between an  
3 estimate and a guess; correct?

4 A Yes.

5 Q Perfect. Now, are you currently under the  
6 influence of any substance that might impede your  
7 ability to provide us your best testimony today?

8 A No. Good and clean.

9 Q Perfect. The deposition has the same effect  
10 as if you were testifying at trial; however, if you need  
11 a break for whatever reason, let me know. My only  
12 caveat to that is that I will ask you to let me finish  
13 my question, and you provide me a response before we  
14 take a short break. But again, I don't anticipate that  
15 this deposition is going to take very long.

16 Does that sound fair?

17 A It's fair.

18 Q I am going to share my screen. And let me  
19 know if you can read this or if you have a copy for  
20 your -- of the subpoena that I served you, that would be  
21 even better. But I am going to share my screen and mark  
22 as Exhibit 1 to this deposition the deposition subpoena  
23 itself.

24 A Okay.

25 (Whereupon, Exhibit 1 is marked for

1 identification and attached hereto.)

2 BY MR. ALEXANDER:

3 Q And let me know if you can see this.

4 A Yes, I see it.

5 Q I am going to scroll down to Item 4, which  
6 states the reason why you are being deposed today. And  
7 it's related to this following topic: "Pablo's  
8 Landscape Services, Inc.'s work related to Estimate No.  
9 dated February 6, 2019, for the installation of  
10 backyard French drainage at 2010 West San Marcos  
11 Boulevard, Lot No. 139, San Marcos, California."

12 Do you see that?

13 A Yes.

14 Q Does that provide your generally understanding  
15 of what your deposition testimony is for today?

16 A Yes, sir.

17 Q And do you recall performing work at 2010 West  
18 San Marcos, Lot No. 139?

19 A Yes, I was there.

20 Q Okay. And does the date February 6, 2019,  
21 refresh your recollection to approximately when that  
22 work was performed?

23 A You said it.

24 Q So is that date accurate? That is when  
25 Pablo's Landscape Services performed work on Lot 139?

1           A     If that is what you got, then, that is what it  
2     is.

3           Q     Okay. Do you have a reason to believe the  
4     date is different or the time frame is different?

5           A     Well, it's been more than five years.

6           Q     And I am going to scroll down on Exhibit 1 to  
7     Attachment 3, documents requests.

8                     Do you see that?

9           A     Yes, sir.

10          Q     Did you provide or strike that.

11                    Have you ever brought any documents with you  
12     today that are responsive to these document requests?

13          A     No, I didn't.

14          Q     Do you have any documents in possession that  
15     might be responsive to these document requests?

16          A     From the date that you are -- that the  
17     argumentative is happening, I moved twice.

18          Q     So the short answer is you don't have any  
19     documents?

20          A     The last move, it was in July 2024. And those  
21     books were back in the -- or I got rid of them.

22          Q     Okay. When the deposition subpoena references  
23     a French drain in the backyard at Lot 139 in 2019, do  
24     you have a general understanding of what that is  
25     referring to?

1 A Yes, French drainage system.

2 Q Okay. Do you recall Pablo's Landscape  
3 installing a French drain at Lot 139 in 2019?

4 A Yes, I do.

5 Q And what do you recall about the installation?

6 A We dig a trench behind the wall, and we  
7 installed the system.

8 Q At whose direction did Pablo's Landscape  
9 Services dig that trench behind the wall at Lot 139?

10 A Bill Katz.

11 Q And do you have an understanding of who Bill  
12 Katz is?

13 A I think he was part of the HOA group at that  
14 time.

15 Q Okay. I have him at Bill Katz with a "z" at  
16 the end?

17 A Yes, Bill Katz.

18 Q Okay. So Bill Katz from the HOA; correct?

19 A Yes, sir.

20 Q And how did you -- how did Pablo's Landscape  
21 come about being hired to do a job?

22 A He contacted us.

23 Q So Bill Katz contacted Pablo's Landscape and  
24 said what?

25 A We have some issues --

1 (Simultaneous colloquy.)

2 BY MR. ALEXANDER:

3 Q Yeah -- can you describe what the issues were  
4 that he was trying to address?

5 A He mentioned he needed some French drains  
6 installed.

7 Q So Bill Katz called Pablo's Landscape and  
8 said, "Hey, we need a French drain installed;" correct?

9 A Yes.

10 Q When he told you that he needed a French drain  
11 installed there, did you ask him why?

12 A I probably did at the time.

13 Q As you sit here today, do you recall?

14 A Bad memories.

15 Q Okay. So you don't remember?

16 A Like I mentioned, bad memories. It wasn't  
17 yesterday.

18 Q Yeah. Okay.

19 Was anyone else contacting you from the HOA  
20 other than Bill Katz on this issue?

21 A No.

22 Q So your only communication with the HOA was  
23 with Bill Katz; is that correct?

24 A Yes. That is right.

25 Q Do you recall going to Lot 139 in 2019 prior

1 to the installation of the French drain?

2 A I think I did. I always do.

3 Q And what do you recall about your visit prior  
4 to the actual installation?

5 A That they wanted a French drain.

6 Q Did Pablo's Landscape pick the location of the  
7 French drain?

8 A It was a mutual agreement between the HOA  
9 personnel and I.

10 Q Okay. Who made the ultimate decision of where  
11 the French drain was going to be installed? Was it you  
12 or Bill Katz?

13 A They requested it. They directed us.

14 Q Okay. And how did they direct you? What did  
15 they do to direct you?

16 A To kind of asked us -- that they needed that  
17 French drain.

18 Q Did they tell you how deep to put the French  
19 drain?

20 A I think at that point, it was determined how.

21 Q And that determination was done between you  
22 and Mr. Katz; correct?

23 A Yes.

24 Q Do you recall anything unusual about Lot 139  
25 when you were installing the French drain?

1           A     Not really. The only thing that I remember,  
2           there is an existing wall. And that is a long exit  
3           wall --

4                     (Simultaneous colloquy.)

5           BY MR. ALEXANDER:

6           Q     I am sorry. You cut out. There was an  
7           existing wall. It was a massive wall. And then you cut  
8           out after that.

9           A     There is an existing wall that extends to the  
10          entire community. And I guess the reason Pablo's  
11          Landscape was contacted, at that time, I vaguely  
12          remember, supposedly, there was an overflow of water on  
13          top of the wall.

14          Q     Was it a retaining wall?

15          A     A wall, retainer wall, whatever it is. I was  
16          not part of the engineering of that retainer. So there  
17          is a wall right there. So I vaguely --

18          Q     Could you describe to me the location of the  
19          wall? And I will make it a little bit easier, do you  
20          recall there being a slope at 139?

21          A     There is a slope, yes.

22          Q     Where was the wall relative to the slope?

23          A     It's basically -- there is houses. There is a  
24          community. There is a flat ground where the houses are  
25          located, and the wall is into the backyard.

1 Q Is it fair to describe it as the wall as the  
2 toe of the slope?

3 A It's the transition from flat place, flat  
4 terrain, to the angle terrain.

5 Q Okay. And where did Bill Katz tell you to  
6 install the French drain?

7 A Behind the wall to prevent that overflow, a  
8 little bit of overflow that they used to get,  
9 supposedly.

10 Q And when you say "behind the wall," did you  
11 have to cut into the slope in order to install the  
12 French drain?

13 A No, just dig behind the wall.

14 Q Okay. And can you describe to me the French  
15 drain system that was installed?

16 A A French drain, it is a pipe. A perforated  
17 pipe that is covered with a sock. It is called sock.  
18 It's a membrane that is covered. And in filling with  
19 gravel -- and in the purposes for French drain is to  
20 collect the water table.

21 Q And how deep was the French drain buried?

22 A Probably 3 1/2, 4 feet.

23 Q And who conducted -- strike that.

24 Who performed the actual digging for the  
25 French drain?

1           A     I did -- I did with couple of my employees at  
2     that time.

3           Q     Okay. Did Mr. Katz contribute to the dig at  
4     all?

5           A     No.

6           Q     Did Mr. Katz perform any manual labor with  
7     respect to the installation of the French drain?

8           A     No.

9           Q     Did Mr. Katz direct how the installation of  
10    the French drain is to be performed?

11          A     No.

12          Q     Did he make any suggestions to you as to how  
13    the installation is to be performed?

14          A     No, that was agreed before. Before we started  
15    the work.

16          Q     Okay. And how many conversations would you  
17    say you had with Mr. Katz before you started the work on  
18    the French drain?

19          A     I think two times, probably.

20          Q     And give me a general summary of what those  
21    conversations constituted?

22          A     Yeah, that. That they needed a French drain  
23    because supposedly there was a little bit of overflow of  
24    water on top of that wall.

25          Q     Okay. Is it fair to say that the HOA and

1 Mr. Katz had already made a decision that a French drain  
2 should be installed, and they reached out to you to see  
3 how much it is going to cost to install the French  
4 drain?

5 A Everybody does. All the clients out there do.  
6 People are smart here.

7 Q So the HOA had already made a decision to  
8 install a French drain prior to contacting you; correct?

9 A I am assuming yes. I wouldn't have -- I  
10 couldn't read their position. I would not be able to  
11 read their position at that time.

12 Q Okay. Do you recall you making a  
13 recommendation that a French drain should be installed  
14 there?

15 A I don't think so.

16 Q And what kind of equipment did Pablo's  
17 Landscape Services use in order to dig up the trench for  
18 the French drain?

19 A Pickaxes and shovels.

20 Q It was all manual labor; correct?

21 A Knees and elbows, yes.

22 Q Elbow grease?

23 A Yes.

24 Q Okay. Was Mr. Katz present when the  
25 installation of the French drain was occurring?

1 A I think he stopped by so say hi.

2 Q Okay. How long did it take Pablo's to install  
3 the French drain?

4 A Two or three days. Probably three days.

5 Q And let's walk through each day.

6 On day one, what did Pablo's do?

7 A Start digging.

8 Q So day one was just digging; correct?

9 A That's right.

10 Q And when dirt was extracted from the slope,  
11 where was it stored?

12 A We hauled it away.

13 Q To where?

14 A To the correct place to dump -- to dump the  
15 dirt.

16 Q You discarded the dirt; is that accurate?

17 A Not all of it.

18 Q So some of the dirt stayed on the site;  
19 correct?

20 A That's right.

21 Q Okay. And what was the moisture content of  
22 the dirt that Pablo's exacted from the slope?

23 A Normal.

24 Q What do you mean by that, "normal"?

25 A It's the normal ground when you start digging.

1 Q In other words, nothing was out of the  
2 ordinary from your experience; correct?

3 A No.

4 Q Do you know what kind of dirt it was?

5 A Regular dirt. Little bit -- little bit --  
6 with a little bit of gravel with rocks in it.

7 Q How much of the dirt that was excavated on day  
8 one remained on-site to be reused?

9 A Probably nothing.

10 Q And did you encounter any sprinklers when you  
11 were digging?

12 A A few of them.

13 Q And where they located?

14 A Along the wall.

15 Q Did you have to remove any sprinklers in order  
16 to install the French drain?

17 A That is normal. If things are there in the  
18 way, you remove it. Once you finish the project, you  
19 put back everything that is from the original.

20 Q Do you recall removing any sprinklers from the  
21 slope in order to install this French drain?

22 A We kind of just put them on the side. I  
23 clearly recall not really removing them, but there was  
24 the -- they were kind of flexible piping, not regular  
25 pipe. So we kind of just pushed them on the side.

1 Q So was day one of Pablos' scope of work  
2 digging only?

3 A Sorry?

4 Q During day one, was -- did Pablo's only dig up  
5 the hole for the French drain?

6 A That's right.

7 Q Okay. So what happened during day two?

8 A Continued digging.

9 Q Was the entire day consistent of the same as  
10 day one, just digging dirt?

11 A I guess. I think it lasted three days, which  
12 is now bad memories. I think we lasted three days.

13 Q Okay. So roughly between two and three days,  
14 but you recall the first day was -exclusively was  
15 digging? And the second day then you were exclusively  
16 digging also; correct?

17 A I probably started preparation for the pipes  
18 and everything.

19 Q Okay. What do you mean by "preparation for  
20 the pipes"? What does that process entail?

21 A Basically we start checking out how to install  
22 it, what angles, what direction.

23 Q And who selected what kind of pipes to be  
24 installed in the French drain?

25 A Me. As a professional, I know what pipes.

1 Q When did the actual pipe installation start?

2 A I think by the end of the second day.

3 Q And is it fair to say that it continued into  
4 day three?

5 A I guess, yeah, in the morning times.

6 Q How long does it typically take once you have  
7 a trench of this size to install the actual pipe system  
8 itself?

9 A In that particular project, it took us  
10 probably four or five hours.

11 Q Okay. So by day three, you had installed the  
12 system itself; correct?

13 A I think by day three we started covering it  
14 back.

15 Q Okay. And when you say "covering it back,"  
16 you mean with dirt; correct?

17 A No. With gravel.

18 Q Okay. So describe to me the system, then.  
19 You have a perforated pipe.

20 And what is the perforated pipe made out of?  
21 Is it metal, plastic, or something else?

22 A Plastic. A particular material.

23 Q Do you recall what kind of material it was?

24 A SDR 35 they call it. Why? I have no idea.

25 Q Fair. Do you recall the diameter of the pipe

1 that was installed?

2 A 4-inch.

3 Q And why was 4-inch selected?

4 A Because that is done there.

5 Q Do you know the amount of water that was  
6 being -- that was splashing over the retaining wall  
7 prior to the installation of the French drain?

8 A No.

9 Q Okay. So you installed the perforated pipe.  
10 Who made the perforations? Is it you, or is  
11 it bought from the factory?

12 A From the manufacturer. It's already bought  
13 with the holes in it.

14 Q And how wide are the holes? Do you know?

15 A I think one is the 1/8 of an inch.

16 Q And how far are they spaced out?

17 A Probably 5, 6 inches.

18 Q So you laid down the perforated pipe, then  
19 what? Describe to me the process.

20 So you are laying down -- strike that.

21 Obviously you dig up the trench. And I think  
22 you said it was between 3- and 4-feet deep; correct?

23 A Somewhere in there. I think 4 feet, probably.

24 Q Then you put in the perforated pipe; correct?

25 A Yes. And then we put the sock in it.

1 Q Okay. So there is a sock that goes around the  
2 pipe, or is it on top of the pipe?

3 A Around the pipe.

4 Q And what is this sock made out of?

5 A It's cloth. It's a see-through cloth that  
6 allows the water to seep through the holes.

7 Q Okay. And then what is applied?

8 A I'm sorry. What is that again?

9 Q Then what is applied?

10 A Oh, then the gravel.

11 Q And how much gravel is applied on top of the  
12 perforated pipe?

13 A At this particular one, I think Bill Katz  
14 asked us to refill it all the way to the top with  
15 gravel.

16 Q Did you question Bill Katz's decision to fill  
17 the pipe with gravel to the top?

18 A I think at that time the common sense was  
19 let's prevent the over -- the overflow of water.

20 Q Okay. Was there dirt applied on top of the  
21 gravel after that?

22 A I think we did because that is the normal  
23 standard. You fill it up on top, the last probably  
24 1 1/2 or 2 feet probably. But I think at this time we  
25 only filled it only with gravel.

1 Q Would it refresh your recollection if I  
2 represented to you that the slope was filled with dirt  
3 after?

4 A Well, the slope is dirt. There was no ground  
5 cover. It was dirt. There is just -- there was just  
6 few bushes sticking up throughout the slope. It's  
7 pretty common.

8 Q Okay. Did Pablo's Landscape reuse any of the  
9 dirt that it had excavated in order to install the pipe?

10 A No. I think at this particular job we hauled  
11 everything away.

12 Q Okay. Do you have an understanding as to  
13 whether or not Mr. Katz is a licensed civil engineer?

14 A I don't know. I don't know his life.

15 Q You don't know what? I'm sorry.

16 A I don't know about his life.

17 Q Oh, oh, his life. Okay.

18 Well, are you a licensed civil engineer?

19 A I am just a licensed C27 landscaper.

20 Q Was anyone on your crew, who you had hired, a  
21 licensed civil engineer?

22 A No.

23 Q Was anybody at Pablo's Landscape Services,  
24 including yourself or any members of your team, a  
25 hydrologist?

1 A No.

2 Q Did Pablo's Landscape review any county  
3 records related to the slope material and grading prior  
4 to the installation of the French drain?

5 A No.

6 Q Did anyone instruct you to review as graded  
7 plans for Lot 139 prior to the installation of the  
8 French drain?

9 A No.

10 Q I am going to share my screen again. And we  
11 are going to mark next in order Exhibit 2.

12 (Whereupon, Exhibit 2 is marked for  
13 identification and attached hereto.)

14 BY MR. ALEXANDER:

15 Q And I am showing you, if you can see this,  
16 Estimate No. 9 dated February 6, 2019.

17 Do you see Exhibit 2?

18 A Yes.

19 Q This is Estimate No. 9 that was referred in  
20 Exhibit 1; correct?

21 A Yes.

22 Q And this is the -- the description of the work  
23 is under the one and only item. Which is: "Backyard  
24 French drainage dig 1- to 2-feet deep behind the  
25 retainer wall. Install the 4-inch SDR/PVC pipe. Fill

1 it up with road base/Class 2 and haul away the extra  
2 dirt."

3 Do you see that?

4 A Yeah.

5 Q Is this consistent with what you just  
6 described was your work at Lot 139 in 2019 with respect  
7 to the French drain?

8 A Well, I guess the deepness. The depth of the  
9 trench.

10 Q The depth you testified was 4 feet; correct?

11 A Somewhere in there. Honestly, I would have to  
12 go back and recheck to make sure how deep it is.

13 Q Did Pablo's consult with civil engineer prior  
14 to installing the French drain?

15 A No.

16 Q Did Pablos's plan to consult with a  
17 hydrologist prior to the installation of the French  
18 drain?

19 A No.

20 Q Is it fair to say you were following Bill  
21 Katz's direction in installing the French drain?

22 A I guess, yes.

23 Q Is it fair to say that Pablo's Landscape  
24 relied on Mr. Katz's representation in installing the  
25 French drain?

1           A     I guess, yes. They contacted me. And I,  
2     "Yeah. Yeah, we can do a French drain for you."

3           Q     Okay. And the cost for per unit price on  
4     total amount on Exhibit 2 is reflected in this \$3,500;  
5     correct?

6           A     That's right.

7           Q     Was Pablo's paid for this dollar amount?

8           A     Yes.

9           Q     And who paid Pablo's Landscape this dollar  
10    amount?

11          A     I guess the HOA.

12          Q     When you say you guess the HOA, was it the HOA  
13    or somebody else?

14          A     Bill Katz handed us a check from the HOA.

15          Q     And you mentioned that you do not have a civil  
16    engineer license; correct?

17          A     I don't have one, yes.

18          Q     Have you ever had one?

19          A     I wish.

20          Q     I am going to share my screen. I am not  
21    marking this as an exhibit. But I am on the CSLB  
22    website. And we have Pablo's Landscape Services, Inc.  
23                 Do you see that?

24          A     That's right.

25          Q     And we have a contractor license number

1 1011797.

2 Do you see that?

3 A That's right.

4 Q Is this Pablo's Landscape Services, Inc.  
5 contractor's license number?

6 A That's right.

7 Q And we have classifications as C27  
8 landscaping; correct?

9 A That's right.

10 Q And C61, D41[sic], tree service; correct?

11 A That's right.

12 Q When did Pablo's Landscape obtain a license  
13 which is 1011797?

14 A I guess 2016.

15 Q How would you -- I don't want you to guess.  
16 Is that an estimate that it was 2016, or a  
17 flat-out guess?

18 A I think it was 2016.

19 Q Does this issue date of March of 2016 refresh  
20 your recollection?

21 A Right there. I guess if that is the official  
22 information, then yes.

23 Q Has your license ever been inactive with the  
24 CSLB?

25 A No -- oh, yes, I think one time. We couldn't

1 pay the worker's compensation.

2 Q What year was that?

3 A Probably three years ago, two years ago.  
4 Somewhere in there.

5 Q What I am getting at is: Was Pablos's  
6 licensed at the time that this French drain was  
7 installed?

8 A Yes, I was licensed then.

9 Q And when did Pablo's obtain its C27  
10 classification?

11 A C27, yeah. It's right there. 2016.

12 Q And same with C61/D49; correct?

13 A No. I added it -- I added on later.

14 Q Okay. And what is -- what are you permitted  
15 to do under C27 landscaping? What special work are you  
16 allowed to that you would not be allowed to if you did  
17 not have this classification?

18 A It encompasses basically outdoor landscape,  
19 French drainage, irrigation.

20 Q So landscape systems; correct?

21 A Landscapes, drainage system, which is not  
22 sewer, storm drainage systems, irrigations. Basically  
23 almost everything related outdoors.

24 Q Do you have an understanding what the  
25 difference is between a landscaping C27 classification

1 and a civil engineer license?

2 A I know.

3 Q And what is it, to your understanding?

4 A A C27 follows the instruction of a civil  
5 engineer or the homeowners, or an associate, whoever  
6 contacts me.

7 Q So under C27, you are allowed to perform the  
8 work; but you have to be performing under somebody  
9 else's instructions; is that correct?

10 A No. To a civil engineer, yes. To a  
11 homeowner, no. They just contact us, and we perform the  
12 jobs in our own --

13 Q Prior to the installation of the French drain,  
14 did you make a determination how this French drain may  
15 impact the slope's stability at 139?

16 A I didn't really consider because that is  
17 pretty common, a simple drainage system.

18 Q Do you have an understanding of how many cubic  
19 feet of dirt the retaining wall at 139 was designed to  
20 retain?

21 A The weight.

22 Q Well, the question was: How many cubic feet  
23 of dirt are behind that wall on the slope?

24 A It's a slope. It's a hill.

25 Q Do you recall the size of the slope? In other

1 words, how tall was it? How far up does it go?

2 A Probably, I think, there were tiers. So I  
3 think the first tier was probably 15 feet.

4 Q Do you recall how many sprinklers were on the  
5 slope at 139?

6 A At that particular section, probably four of  
7 them.

8 Q And where were they located?

9 A On the slope.

10 Q Well, when you say "that particular section,"  
11 do you mean where the French drain was?

12 A Where we were worked and installed the French  
13 drain.

14 Q Did you climb up the slope at any point?

15 A No.

16 Q Did you do any other investigation of the  
17 slope prior to the installation of the French drain?

18 A There was no survey done.

19 Q Okay.

20 A No civil engineer was hired to do a survey.

21 Q And what is the C61/D49 tree service  
22 contractor classification? What does that allow you to  
23 do?

24 A You do trees. Cut down trees.

25 Q Does that include managing -- managing bushes?

1 A That falls under the C27.

2 Q Oh, okay.

3 How about weed control?

4 A Same, to C27.

5 Q So if you were to pull out weeds, it would be  
6 under C27; correct?

7 A That's right.

8 Q I have no further questions up, Mr. Pablo. I  
9 really appreciate your time today.

10 A All right. Thank you.

11 (Whereupon, at 10:18 a.m., the deposition of  
12 Noe Pablo-Pablo's Landscape Services, Inc. was  
13 concluded)

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I, \_\_\_\_\_, do hereby declare under penalty of perjury that I have read the foregoing transcript; that I have made any corrections as appear noted, in ink, initialed by me, or attached hereto; that my testimony as contained herein, as corrected, is true and correct.

EXECUTED this \_\_\_\_ day of \_\_\_\_\_, 2026,  
at \_\_\_\_\_, \_\_\_\_\_.  
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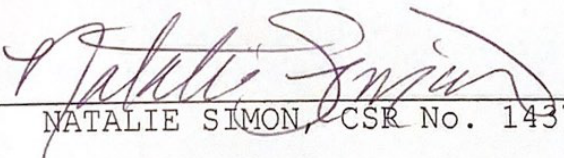
\* \* \* \*

The undersigned Certified Shorthand Reporter of the State of California does hereby certify:

That the foregoing Proceeding was taken before me at the time and place therein set forth.

That the testimony and all objections made at the time of the Proceeding were recorded stenographically by me and were thereafter transcribed, said transcript being a true and correct copy of the proceedings thereof.

In witness whereof, I have subscribed my name, this date: February 25, 2026.



NATALIE SIMON, CSR No. 14375