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ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
01/11/2024 at 07:00:00 PM
Clerk of the Superior Court
By Nora Lopez, Deputy Clerk

8 Attorneys for Defendant, Nathan Fletcher

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**

10 **FOR THE COUNTY OF SAN DIEGO - HALL OF JUSTICE COURTHOUSE**

11 GRECIA FIGUEROA,

12 Plaintiff,

13 v.

14 NATHAN FLETCHER, an individual; SAN
DIEGO METROPOLITAN TRANSIT
15 SYSTEM, a California public agency; and,
DOES 1-20, Inclusive,

16 Defendants.

CASE NO.: 37-2023-00012828-CU-OE-CTL
[Unlimited Jurisdiction]

*Assigned for all purposes to the Honorable
Matthew C. Braner, Department C-60*

**DECLARATION OF SEAN L.
MCKAVENEY IN SUPPORT OF
DEFENDANT NATHAN FLETCHER'S
MOTION TO STRIKE PLAINTIFF'S
SECOND AMENDED COMPLAINT**

*[Filed concurrently with the Notice;
Memorandum of Points and Authorities; and
Proposed Order]*

DATE: May 3, 2024
TIME: 9:00 a.m.

Complaint Filed: March 28, 2023
Trial Date: Not Set

22 I, Sean L. McKaveney, hereby declare and state as follows:

23 1. I am an attorney at law duly licensed to practice before all Courts in the State of
24 California. I am an associate with Fisher & Phillips LLP, counsel of record for Defendant Nathan
25 Fletcher ("Defendant"). Based on my personal knowledge, I assert the facts set forth herein and,
26 if called as a witness, I could and would competently testify thereto.

27 2. Attached hereto as **Exhibit A** is a true and correct copy of the meet and confer
28 letter my office sent to Plaintiff and her counsel on January 3, 2024.

EXHIBIT A



fisherphillips.com

THE PRIDE LAW FIRM
2831 Camino del Rio South, Suite 104
San Diego, California 92108

January 3, 2024

Re: **DEMAND FOR IMMEDIATE DISMISSAL**
Figueroa v. Fletcher, et al.; Case No.: 37-2023-00012828

Dear Counsel:

This is a formal demand that your client immediately dismiss this entire lawsuit against our client. Grecia Figueroa has always known that she was never sexually assaulted or harassed by Mr. Nathan Fletcher and that she was terminated by MTS due to her own poor job performance. Yet, through assistance from her attorneys, she has perpetuated an outrageously false tale to obtain a seven-figure settlement, all while strategically withholding countless exculpatory facts from the public and making intentional misrepresentations to the Court.

The evidence proves – beyond any doubt – that Ms. Figueroa was the aggressor in her interactions with Mr. Fletcher. It shows that she initiated social media communications with him, asked him to always message her first, and spoke to him in erotic tones. She flirted with him, dreamt about him, and, eventually, desired oral sex with him (which Mr. Fletcher declined).¹ She promised him she was comfortable and told him she enjoyed their encounters. After *each* of the three purported incidents of sexual assault referenced in the Complaint, Ms. Figueroa eagerly and voluntarily sought more opportunities to meet with him privately. She stated that she “missed his lips”, practiced “*not* thinking about kissing his face,” wished he was physically with her in her bed, and asked that he bring her gifts and celebrate her birthday (all which Mr. Fletcher declined). Nevertheless, evidence of consent is overwhelming and abundant, and is summarized in detail below. The entirety of their communications are attached for your office to re-review.

Additionally, the evidence also shows that Mr. Fletcher played no part in Ms. Figueroa’s termination from San Diego Metropolitan Transit System. She has always known – and has now admitted under oath – that he was not her employer or direct supervisor. He had no authority to hire her, pay her salary, determine her work schedule, or promote or terminate her employment. She has conceded that “her job required very little, if any, direct interaction” with him and there is

¹ Ms. Figueroa has admitted, under oath in her discovery responses, that she never had sexual intercourse or oral sex with Mr. Fletcher. For his part, Mr. Fletcher never communicated an intent or interest in having sex, often expressed hesitancy and disinterest when responding to Ms. Figueroa’s flirtations, and repeatedly re-affirmed that she remained comfortable.

Fisher & Phillips LLP

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no evidence suggesting any workplace harassment, violence, or retaliation against Ms. Figueroa by Mr. Fletcher, or by anyone else. The evidence is clear that she was a poorly performing employee who was terminated following numerous warnings from her supervisors.

Despite the evidence, Ms. Figueroa publicly declared that “*nothing* about [her interactions with Mr. Fletcher] was consensual”;ⁱ that she had “all the proof” to support her salacious allegations;ⁱⁱ that she would produce evidence that was “damning [as fuck]”;ⁱⁱⁱ and that she was owed a public apology.^{iv} Each of these statements proved to be false, but her fictitious story was still repeated millions of times, garnered state-wide attention, and immediately destroyed Mr. Fletcher’s hard-earned reputation and career. ***He and his family sustained permanent, emotional and economic harm due to her false allegations.*** Unfortunately, none of it was accidental and all of it was by Ms. Figueroa’s design.

From the beginning, Ms. Figueroa and her team of attorneys possessed all necessary evidence to understand that this lawsuit was entirely without merit. Still, they chose to repeatedly re-publish her false allegations in three separate complaints. Alternatively, Mr. Fletcher has always truthfully acknowledged that he made a personal mistake within his marriage, but that he did not engage in any legal wrongdoing. Evidence supporting his position is undeniable. For these reasons, Ms. Figueroa and her counsel, Zachary Schumacher, Zachary Freire-Avina, Jessica Pride, and Dante Pride have maintained this lawsuit in bad faith and for malicious purposes.

As a result, this correspondence represents our formal demand that Ms. Figueroa immediately dismiss all of her claims against Mr. Fletcher, with prejudice. Please also accept this meet and confer letter as formal notice that all forms of relief – including a Motion to Strike and/or Demurrer – will be pursued against Ms. Figueroa and her attorneys, should she persist with this public charade and continue to inflict emotional and economic damage on Mr. Fletcher through her knowingly false allegations. Our position and demand are detailed fully below.

1. A Crumbling Façade: Ms. Figueroa’s False Narrative and Deceptive Legal Strategy

On March 28, 2023, Ms. Figueroa falsely claimed that Mr. Fletcher sexually assaulted her during her employment with the San Diego Metropolitan Transit System,^v and that her termination was motivated by his campaign for the California State Senate.^{vi} Ms. Figueroa demanded that she be believed and lamented that the phrase “believe women” was often exploited as a “façade” to advance one’s own self-interest.^{vii} She referenced being called “a liar, a mistress, a gold digger, and far worse names,” but cautioned that conclusions should not be drawn “before a single piece of evidence has hit the courtroom.”^{viii} She initially invited “accountability” and “transparency” in this case.^{ix}

Despite Ms. Figueroa’s grand pronouncements, she and her attorneys have known – **from the beginning** – that her claims lack legal and factual support. Ms. Figueroa downloaded her entire Instagram communications with Mr. Fletcher on or around February 16, 2023, over a month before this lawsuit was filed.^x She later created a screen-recording that imaged all of her communications as they visually appeared on the Instagram app. These messages show that she

was an eager and voluntarily participant in her interactions with Mr. Fletcher.² Mr. Schumacher used *dozens* of these messages – out-of-context – to concoct an intentionally misleading and inflammatory narrative that falsely portrayed Ms. Figueroa as an un-consenting victim of sexual assault and battery. When Mr. Fletcher rejected her fictitious story and refused to submit to her exploitative financial demands, Ms. Figueroa filed her Complaint in retaliation.

After the Complaint was filed, Mr. Fletcher formally requested – at his first opportunity – that the entirety of the Instagram communications be produced in discovery. Despite Ms. Figueroa’s calls for “transparency,” she took every possible action to prevent production. Her new attorneys, The Pride Law Firm, refused to produce a single document; falsely withheld production under the guise of a nonexistent protective order; and attempted to quash a subpoena to Meta Platforms, Inc. that independently requested the messages. After Mr. Fletcher was forced to seek a court order to obtain the relevant evidence, The Pride Law Firm – and specifically, Mr. Zachary Freire-Avina – falsely represented to the Court that *all* of Ms. Figueroa’s communications had *already* been produced, when in-fact, over 100+ pages of documents were still being withheld.^{xi} Such conduct was inappropriate and directly contrary to Ms. Figueroa’s supposed interest in “accountability” and “transparency.”

We now understand why Ms. Figueroa so strongly resisted production of her communications with Mr. Fletcher. The documents revealed that the Complaint perpetuated a **false** narrative – unsupported by any credible facts or documents – seemingly for the purpose of destroying Mr. Fletcher’s political career and family and allowing Ms. Figueroa to enjoy fifteen undeserved minutes in the public eye. Indeed, the documents fully exonerate Mr. Fletcher and, in the Court’s own words, go “to the very core of [Ms. Figueroa’s] claims against him.”^{xii}

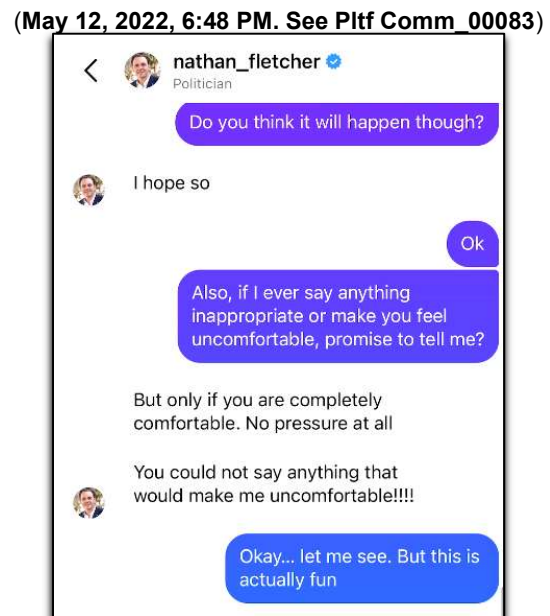
Now, the façade of Ms. Figueroa’s story is crumbling. *Mere hours* after the evidence was finally ordered to “hit the courtroom,” Mr. Schumacher withdrew his representation from the case. The Pride Law Firm was also heavily sanctioned by the Court for refusing to produce the **120 pages of documents** that Ms. Figueroa downloaded on or around February 16, 2023. For these reasons, it is obvious this case is a sham: **Ms. Figueroa was not sexually harassed or assaulted by Mr. Fletcher, nor did he play any part in her employment or termination. Every interaction was consensual.** Ms. Figueroa and her team have known these facts from the beginning but continue to prosecute this lawsuit knowing the harm they cause.

2. Incident by Incident Analysis: Ms. Figueroa was Never Sexually Assaulted

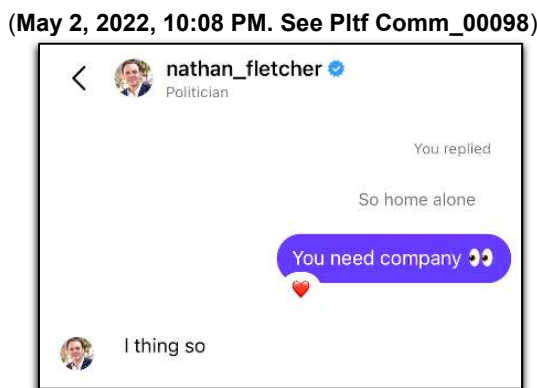
The Pride Law Firm’s general litigation practices are extremely concerning. Judge Matthew Braner recently held that allegations in other lawsuits filed by The Pride Law Firm were so “objectively unreasonable” that severe sanctions were warranted to deter similarly unreasonable conduct in the future.^{xiii} A sworn, public declaration filed in that same case also revealed that The Pride Law Firm allegedly admitted during a phone call that “**We don’t care if we get damages. We are going to get publicity.**”^{xiv} In other proceedings, motions and related-terminating sanctions have been requested against The Pride Law Firm for “disregard for

² The entirety of Ms. Figueroa’s communications with Mr. Fletcher are enclosed herein for your office to re-review, in-context. See Attachment 1.

In reality, **hundreds** of written communications between Ms. Figueroa and Mr. Fletcher were wrongfully omitted from the SAC because they undermine these allegations. These messages occurred in the days immediately preceding their May 12th encounter and included over **100+ messages** transmitted that same day. In these communications, Mr. Fletcher and Ms. Figueroa mutually flirted with each other, expressed consent to each other, and jointly planned their first private meeting. On May 2, 2022, Ms. Figueroa “promised” she would not be communicating with Mr. Fletcher if she felt uncomfortable. On May 12, 2022, they each again confirmed that they were still comfortable with their interactions, with Mr. Fletcher specifically conditioning any meeting on Ms. Figueroa being “completely comfortable”. In response, she described their interactions as “actually fun”:

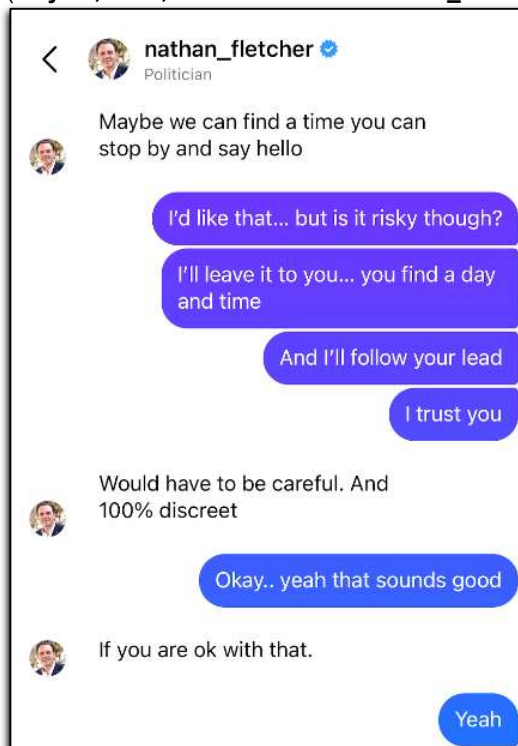


Similarly, contrary to the SAC's claim that Mr. Fletcher “convinced” and “lured” Ms. Figueroa to his hotel, it was *Ms. Figueroa* who affirmatively stated that Mr. Fletcher “needed company.” She wrote this after learning that he was home alone. The following morning, she also invited him to “always” initiate texting, even after he apologized for being flirty and suggestive:



Shortly after being invited to initiate text messaging, Mr. Fletcher suggested that they find a time where Ms. Figueroa could “stop by and say hello.” In response, she stated “I’d like that...but is it risky though?” Mr. Fletcher replied they would have to be “careful” and “100% discreet”, so long as Ms. Figueroa remained comfortable. She unambiguously consented to the encounter by inviting *him* to “find a day and time” to meet; stating that she would “follow [his] lead”; declaring that she trusted him; and acknowledging they both would need to be careful and discreet to mitigate any risks. Obviously, this exchange is vastly different from the SAC’s false narrative that Mr. Fletcher unilaterally “insisted” that Ms. Figueroa keep the interaction “very ‘discreet’.” (SAC ¶¶28). Immediately thereafter, Ms. Figueroa gave him the nickname “Papasito” (meaning “Little Daddy”) and sent a flirtatious 23-second audio recording. Curiously, she and The Pride Law Firm continue to refuse to produce the recording in discovery, or even acknowledge its existence^{xvii}, despite a Court Order. Such conduct again suggests that Ms. Figueroa and The Pride Law Firm understand that this lawsuit is meritless and based entirely on misrepresentations about the nature of the relevant interactions. The communications are clear that Ms. Figueroa was a full, active, and willing participant in her encounters with Mr. Fletcher, contrary to the SAC’s false allegation that she only “mimiced his erotic tone because she was afraid” (SAC ¶ 38):

(May 12, 2022, 6:43 PM. See Pltf Comm_00086)



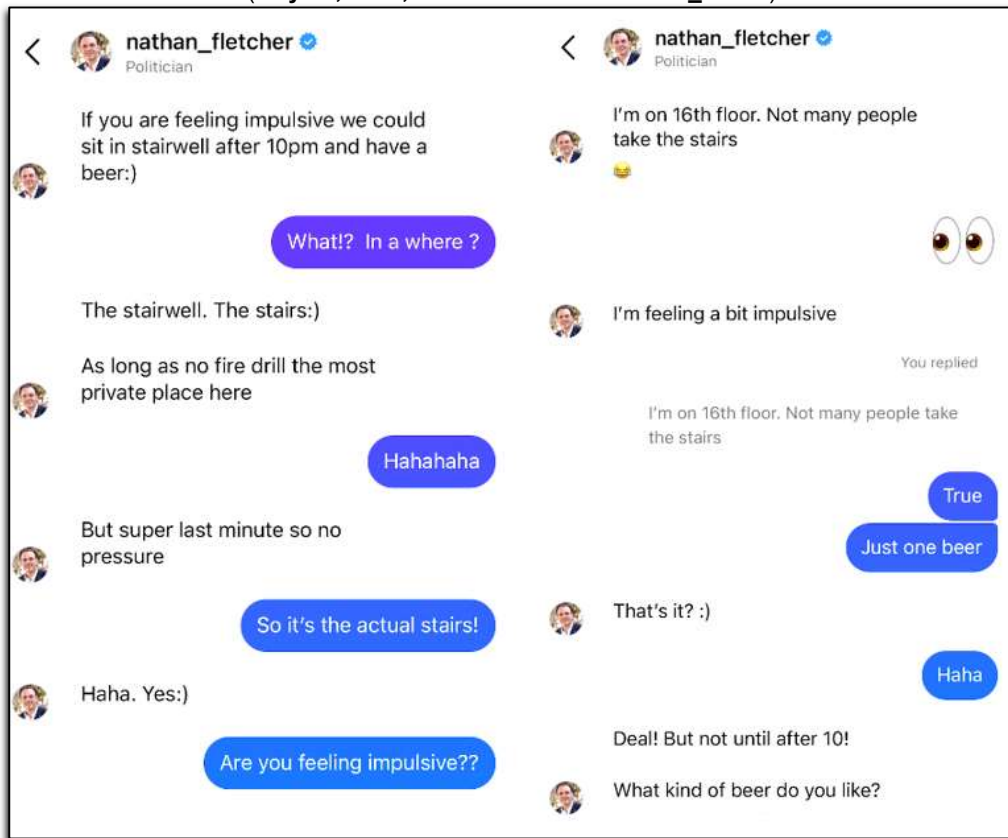
(May 12, 2022, 6:50 PM. See Pltf Comm_00082)



Within this context, Mr. Fletcher and Ms. Figueroa continued to flirt and coordinate an in-person meeting. After some back and forth, they mutually coordinated a meeting in a stairwell at Mr. Fletcher’s hotel. Still, Mr. Fletcher re-emphasized that there was “no pressure” to meet and

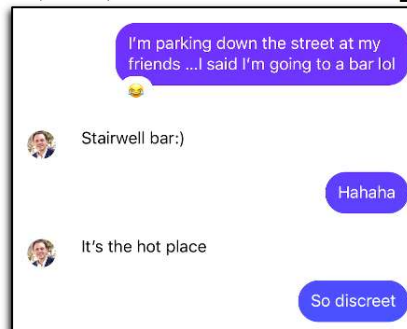
they both asked *each other* if they were “feeling impulsive,” contrary to the SAC’s suggestion that *only* Mr. Fletcher had the feeling. Such facts were intentionally omitted and/or misrepresented in Paragraphs 30-32 of the SAC to create a **false** narrative regarding the true nature of their mutual and consensual interactions:

(May 12, 2022, 8:28 PM. See Pltf Comm_00079)



On her way to meet him, Ms. Figueroa lied to her friend about her true whereabouts, before continuing to joke with Mr. Fletcher about the discreet nature of their interactions:

(May 12, 2022, 9:34 PM. See Pltf Comm_00075)



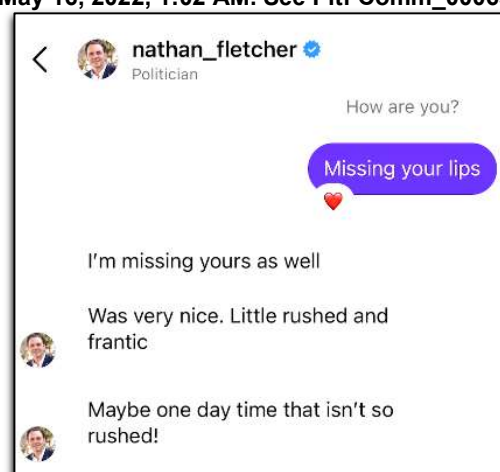
Once Ms. Figueroa arrived at the hotel, she chatted with Mr. Fletcher in the stairwell for approximately 2-3 hours. At the end of the encounter, they briefly kissed each other. The Second Amended Complaint **falsely** suggests that this interaction was unwelcome and/or nonconsensual.

In reality, Ms. Figueroa's messages demonstrate that she was excited about what occurred. For example, she texted "What a night!" immediately after arriving back home. Several days later, on May 16, 2022 and in response to Mr. Fletcher asking "how are you?", she replied that she "missed [his] lips". She further stated that she would need to practice "totally not thinking about kissing his face right now" prior to an upcoming press conference. This is hardly the type of reaction one would have after a supposed sexual battery or assault. Indeed, such overt and mutual flirtations directly contradict the narrative in the SAC regarding the supposed one-sidedness of the subject interactions:

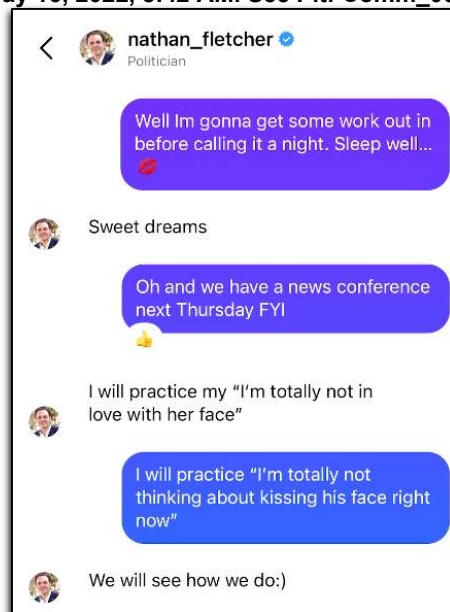
(May 13, 2022, 1:02 AM. See Pltf Comm_00071)



(May 16, 2022, 1:02 AM. See Pltf Comm_00069)



(May 16, 2022, 8:42 AM. See Pltf Comm_00069)



Given the evidence above, it cannot be reasonably disputed that Ms. Figueroa and Mr. Fletcher were mutual, consenting participants throughout the entirety of their encounter at his hotel on May 12, 2022, as well as in all the days that followed. They each participated in planning

the meet-up; they each flirted with each other; they each expressed attraction to each other; they each acknowledged feeling impulsive; they assured each other that they were both comfortable; and they each expressed excitement and enjoyment *after* they left each other's presence. There is nothing in these communications that even remotely suggests Mr. Fletcher's conduct was unwelcome. Ms. Figueroa's affirmative statements that she missed his lips, struggled to not think about kissing his face, and specifically invited him to initiate texting and to find a day/time for their meeting suggest she was not only a willing participant, but that she initiated these contacts with Mr. Fletcher. For these reasons, the allegation that she was "shocked and confused, but [felt] powerless to say no..." is provably false. Her claims that she was "lured" her to his hotel and "convinced" to visit are also overtly false misrepresentations.

Alleged Incident #2: MTS Executive Committee Meeting on June 9, 2022

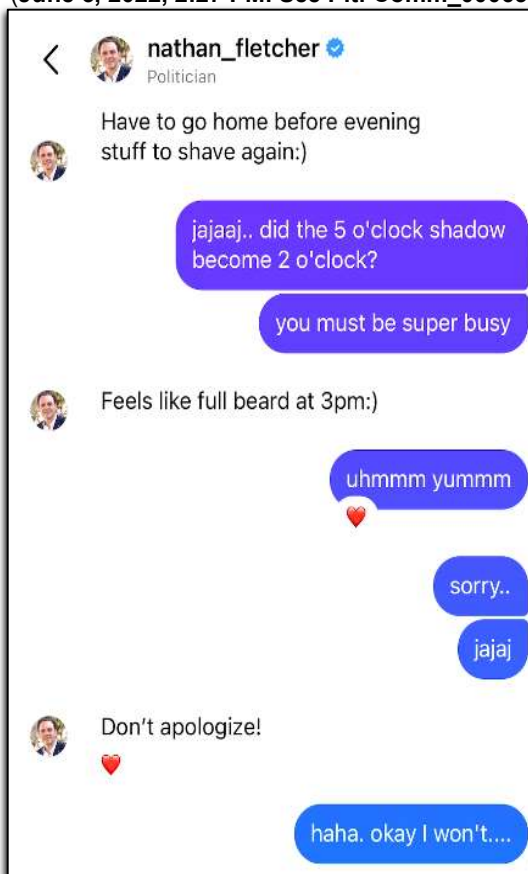
Ms. Figueroa next falsely alleges that after the May 12, 2022 encounter at Mr. Fletcher's hotel, he told her, on June 9, 2022, to meet him in a conference room after an MTS Executive Committee meeting because "[he had] five minutes." (SAC ¶ 37). In the conference room, she claims that he kissed and touched Ms. Figueroa and that she "was not comfortable having this type of encounter with him, especially at MTS headquarters, while coworkers and managers were immediately outside the door." (Id.). Ms. Figueroa alleges that she only entered the room because she was "intimidated by the dynamic Mr. Fletcher had created" and because she "feared that she would lose her job if anyone found out that she was being pursued sexually by the senior most ranking official at MTS...its Board Chair." (SAC ¶ 36). Lastly, she also claims she left the room after supposedly be sexually assaulted because she "felt shocked and uncomfortable."

(Second Amended Complaint, Paragraph 37)

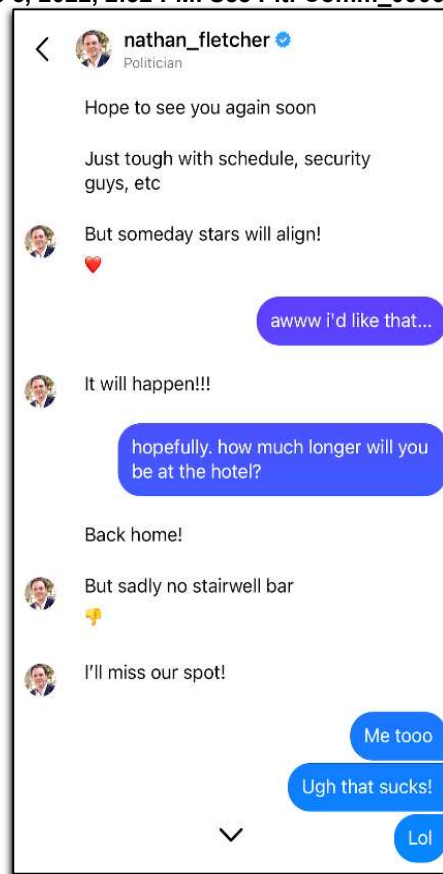
26	37. On June 9, 2022, during an MTS Executive Committee meeting, Fletcher messaged
27	Ms. Figueroa while she was sitting in the audience. He told her to meet him in an adjacent
28	conference room when the meeting was over because "I have five minutes." When she got to the
-10-	
SECOND AMENDED COMPLAINT FOR DAMAGES	
1	room, Fletcher asked her to close the door. He then put his mouth against hers and began to grab
2	her breasts through her clothes. Ms. Figueroa pushed him back because she was not comfortable
3	having this type of encounter with him, especially at MTS headquarters, while coworkers and
4	managers were immediately outside the door. Fletcher assured her that "no one will bother us in
5	here," but Ms. Figueroa felt shocked and uncomfortable and soon left the room.

We now know from Ms. Figueroa’s Instagram communications and discovery responses that each of these allegations are false in every respect.³ The totality of Ms. Figueroa’s communications with Mr. Fletcher on June 9, 2022 (as well as the days immediately before) demonstrate that she intentionally concealed the true nature of their encounter that day. To clarify, on June 3, 2022, Ms. Figueroa texted Mr. Fletcher “uhmmm yummm” after learning that he had grown a near-full beard. In subsequent texts, they mutually expressed that they would like to meet-up again in-person, and that they fondly remembered their time in the stairwell on May 12, 2022. She was “hopeful” to meet him again and stated “awwww I’d like that...” regarding another in-person interaction:

(June 3, 2022, 2:27 PM. See Pltf Comm_00063)



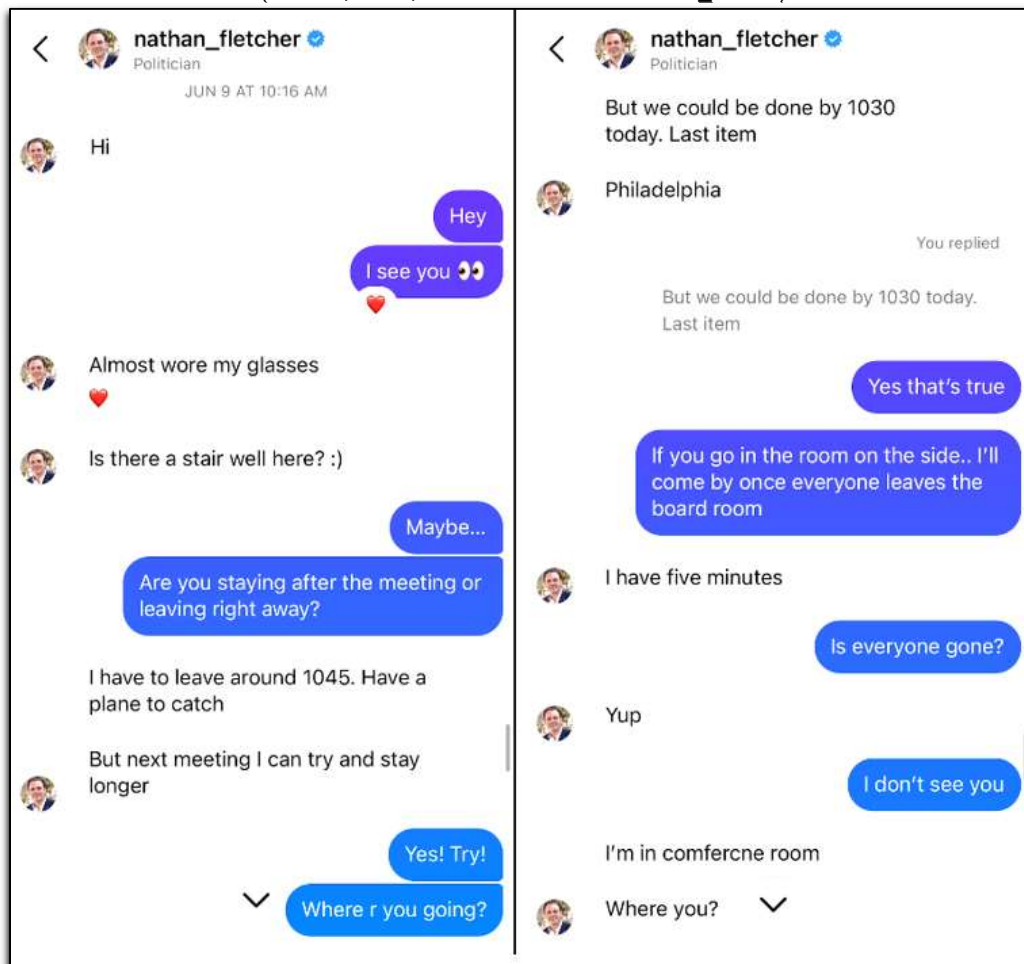
(June 3, 2022, 2:32 PM. See Pltf Comm_00062)



³ Ms. Figueroa has already admitted, under oath, that Mr. Fletcher was not her employer or direct supervisor. He had no authority to hire her, pay her salary, determine her work schedule, or promote or terminate her employment. She has also conceded that “her job required very little, if any, direct interaction” with him. (SAC ¶16). She knew these facts prior to filing her lawsuit in March 2023 but still manufactured her false allegations as part of her concerted effort to assert more baseless claims against him. Thus, her insinuation that Mr. Fletcher was “intimidating” her by threatening an adverse employment action is objectively unreasonable, from the outset.

It was within this context that Mr. Fletcher texted Ms. Figueroa “hi” on June 9, 2022. In response, and contrary to the allegations in Paragraph 37 of the SAC, it was actually *Ms. Figueroa* who told Mr. Fletcher to “Try!” to stay after an MTS Executive Committee meeting. She also told him that she would “come by” to see him “if [he went] in the room on the side.” Mr. Fletcher did as Ms. Figueroa instructed and went into the side conference room. *She* then specifically confirmed that “everyone was gone” prior to entering the room, in direct contradiction to the false narrative that he initiated. Put another way, Ms. Figueroa *wanted* privacy so that she could meet with Mr. Fletcher, contrary to her claim that she was not “comfortable having this type of encounter with him, especially at MTS headquarters, while coworkers and managers were immediately outside the door.” (SAC ¶37).

(June 9, 2022, 9:16 AM. See Pltf Comm_00060)



Ms. Figueroa was in the conference room with Mr. Fletcher on June 9, 2023 for no more than three minutes. Immediately after the encounter, she **never** expressed any discomfort or unease about their meeting. **Instead, she texted Mr. Fletcher a kissing emoji and stated it**

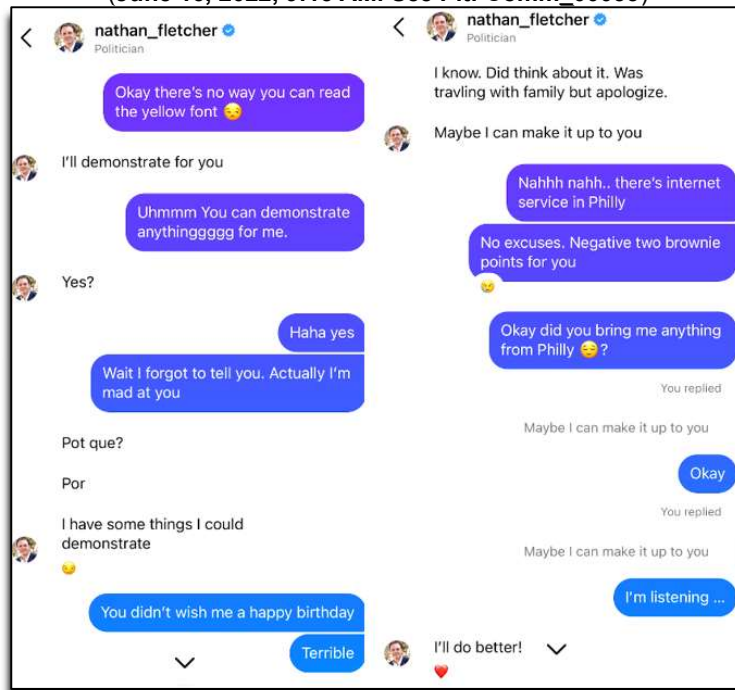
was “nice to see [him]”. She also stated that her birthday was already off to a good start as a result of their meet-up:

(June 9, 2022, 9:46 AM. See Pltf Comm_00057)



Much like her behavior after seeing Mr. Fletcher at his hotel on May 12, 2022, Ms. Figueroa’s conduct *in the days after* the June 9th MTS Executive Committee meeting demonstrates that she not only consented to her ongoing interactions with him, but was a willing participant in those interactions. For instance, on June 16, 2022, **despite alleging that Mr. Fletcher sexually assaulted her just one-week prior**, she jokingly chastised him for failing to wish her a happy birthday before agreeing that he could “make it up to [her].” She also flirtatiously invited him to “demonstrate anythingggggg” for her. If this was not enough, she repeatedly brought him gifts and complained when he didn’t reciprocate. For instance, she asked whether Mr. Fletcher brought her souvenirs from a recent trip:

(June 16, 2022, 9:15 AM. See Pltf Comm_00055)



The following day, on July 17, 2022, Ms. Figueroa and Mr. Fletcher exchanged flirtatious kissing and heart emojis. Two weeks later, on July 4, 2022, she wished him (unsolicited) a “great [July] 4th.” He did not respond:



To recap, **the communications demonstrate – beyond any doubt – that Ms. Figueroa was not assaulted by Mr. Fletcher on June 9, 2022, nor at any other time.** She called him “yum[my]” and expressed an interest in meeting privately with him in the days immediately preceding the Committee meeting. She then told him to “Try!” to stay after the meeting; instructed him which conference room to meet her in; ensured that “everyone [was] gone” before entering the room; and remained in the conference room for no more than three minutes. After supposedly being “sexually assaulted multiple times”, Ms. Figueroa **never** expressed any discomfort and instead texted Mr. Fletcher that her birthday was already “a good one” *immediately* after leaving the room. She accompanied this message with a kissing emoji. In the month after the purported “assault”, she suggestively invited Mr. Fletcher to “demonstrate anythingggg” for her; expressed disappointment when he did not wish her a happy birthday; asked if he brought her any gifts from a recent trip; and wished him a happy Fourth of July.

Based upon Ms. Figueroa’s communications with Mr. Fletcher, it could not be clearer that Ms. Figueroa and her counsel manufactured a **false and egregious** narrative that Ms. Figueroa was sexually assaulted by Mr. Fletcher in a conference room on June 9, 2022, after an MTS Executive Committee meeting.

Alleged Incident #3: MTS Executive Committee Meeting on December 1, 2022

In addition to the hotel encounter on May 12, 2022 and the conference room encounter on June 9, 2022, Ms. Figueroa also **falsely** alleged that Mr. Fletcher sexually assaulted Ms. Figueroa on December 1, 2022 after an MTS Executive Committee meeting. She claims she “carried an unremitting sense of anxiety” and “felt trapped” after her previous encounters with Mr. Fletcher. Although she supposedly wanted Mr. Fletcher to stop “pursuing her sexually,” she suggests in the SAC (using out-of-context communications) that he asked her to “come say hi”

after an MTS event. (SAC ¶ 41, 45). When Ms. Figueroa arrived in the room, he purportedly kissed and touched her, causing her to be “shocked, scared, and “humiliated.” (SAC ¶ 47):

(Second Amended Complaint, Paragraph 41)

20	41. From that point on, Ms. Figueroa carried an unremitting sense of anxiety, wondering
21	if her entire department – or even the entire MTS organization – knew that Fletcher was pursuing
22	her sexually. She felt trapped because, on one hand, Fletcher’s relentless pursuit of her was
23	changing the conditions of her employment and would likely destroy her career and her professional
24	reputation as people learned of the situation and drew their own conclusions about Ms. Figueroa;
25	but on the other hand, she knew Fletcher was too powerful, especially within MTS, to risk upsetting
26	him by trying to make him stop.

(Second Amended Complaint, Paragraph 45)

1	45. On December 1, 2022, during an MTS Executive Committee meeting, Fletcher
2	messed Ms. Figueroa from his phone while he was conducting the meeting. In the message,
3	Fletcher asked Ms. Figueroa to “come say hi” and to meet him in the adjacent conference room
4	after the event.
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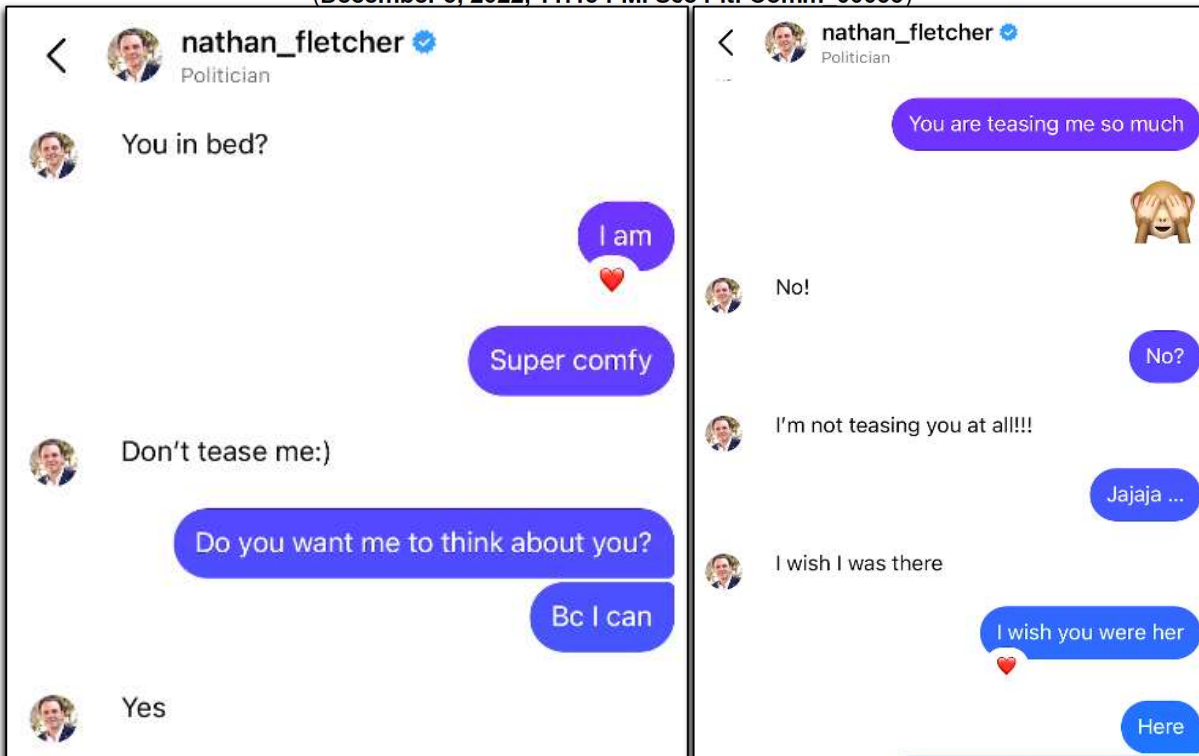
Each of the allegations relating to this December 1, 2022 encounter are **provably false**. Ms. Figueroa again manufactured a fictitious narrative designed to inflame the public against Mr. Fletcher and portray Ms. Figueroa as a “shocked, scared, and humiliated” victim. However, it is clear that *she* eagerly and aggressively pursued Mr. Fletcher’s companionship for several months. For example, contrary to the fictitious story in the SAC, Mr. Fletcher only texted Ms. Figueroa to “come say hi” **after** she flirtatiously told him that she wanted to “**say something inappropriate**” to him. Worse yet, *she* also instructed him to tell *her* “when [he was] alone” before she freely entered the conference room. Ms. Figueroa intentionally omitted these unfavorable and inconvenient details:

(December 1, 2022, 10:13 AM. See Pltf Comm_00036)



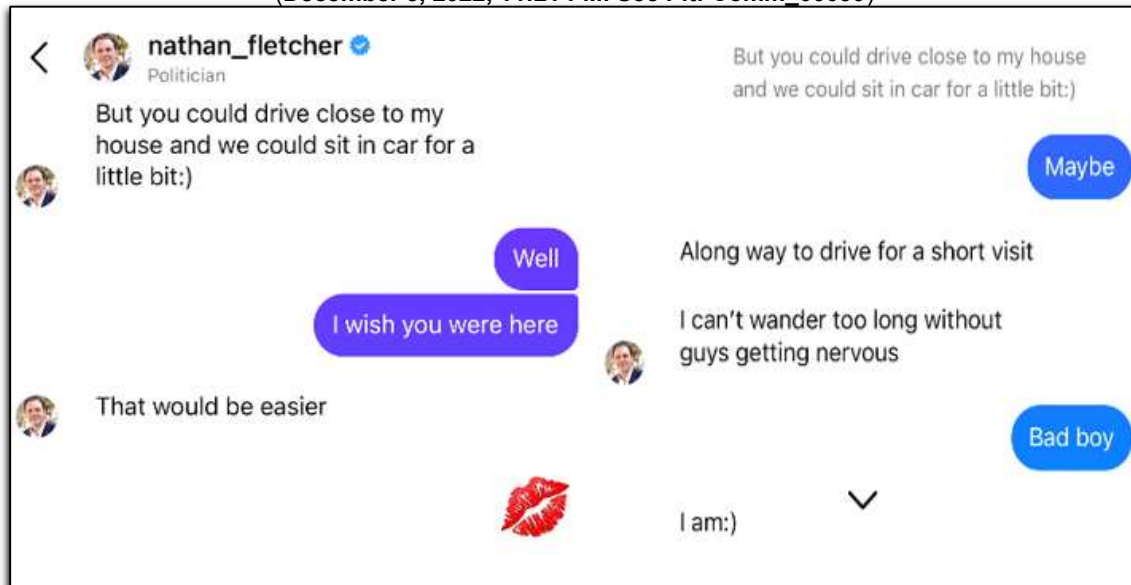
True to form, Ms. Figueroa further omitted **hundreds** of other messages from the SAC that were transmitted *after* the December 1st meeting, and which show her ongoing interest and attraction. For example, **just four days after supposedly being sexually assaulted by Mr. Fletcher**, she offered to think about him while in bed and repeatedly stated that she wished he was physically present with her:

(December 5, 2022, 11:15 PM. See Pltf Comm_00033)



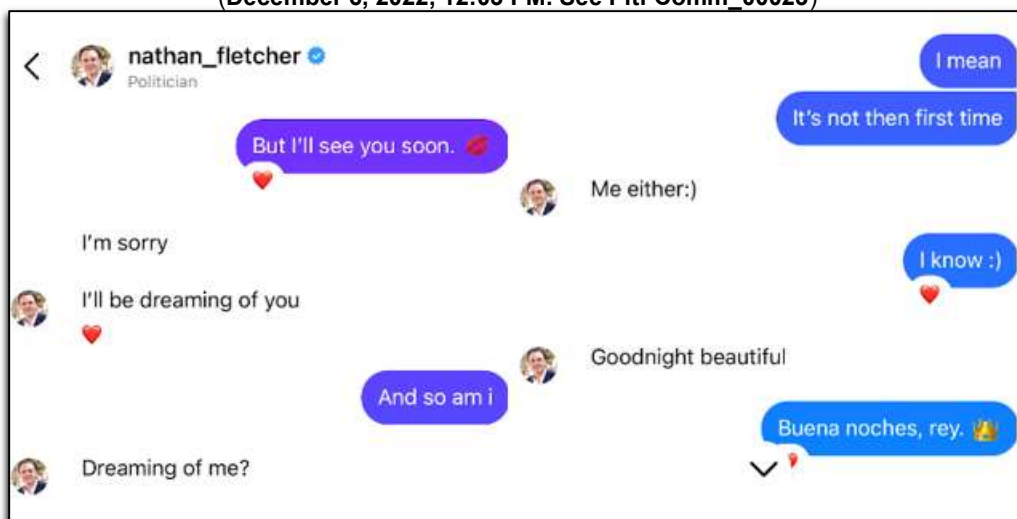
Approximately ten minutes later during this same conversation, Ms. Figueroa continued to flirt with Mr. Fletcher and make sexually suggestive comments to him. First, she offered to “keep [him] company” while he drove home from the airport after returning from a trip to Sacramento.^{xviii} Then, she texted – for a second time – that she “wished [he was with her],” along with a red lips emoji. She also sent a subsequent text calling him a “bad boy.” Ms. Figueroa intentionally removed these segments of their conversation. (Compare to SAC ¶ 49):

(December 5, 2022, 11:21 PM. See Pltf Comm_00030)



After failing to coordinate another in-person meeting, Ms. Figueroa and Mr. Fletcher ended their conversation for the night by telling each other that they would be dreaming of each other. For her part, Ms. Figueroa sent him another red lips emoji and called him “king” and a “delicious little thing” in Spanish. Again, this conversation occurred **just four days after she claimed to have been sexual assaulted**:

(December 6, 2022, 12:03 PM. See Pltf Comm_00023)



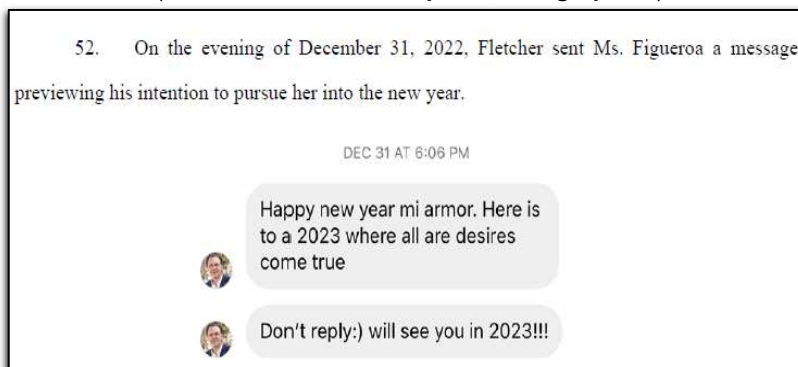
On December 8, 2022, just one week after she was purportedly assaulted, Ms. Figueroa again expressed her consent when she sent Mr. Fletcher a message in which she called him “handsome”, in response to him stating “hi there.” She then stated in Spanish “ganas de comer”, meaning that she “wanted to eat him” – an overt and **highly sexualized** reference to oral sex. Notably, she seemingly deleted this crude comment from her screen-recorded messages, demonstrating that she *knew* its extremely sexual and salacious nature. Ms. Figueroa also confirmed the comment accurately reflected her “**real**” feelings. For these reasons, and like her other communication, this message is in stark contrast to her allegations that she felt “an inescapable blanket of shame, distrust, and entrapment as she realized there was no way to avoid the emotional prison Fletcher created for her at MTS.” (SAC ¶ 51):

(December 8, 2022, 10:00 AM. See Pltf Comm_00021)

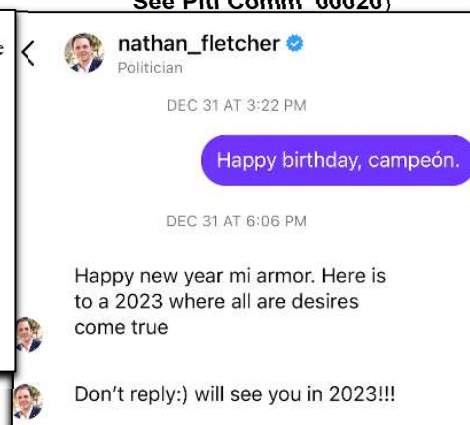


After Ms. Figueroa’s “ganas de comer” comment, Mr. Fletcher stopped responding. Nevertheless, at the end of the month on December 31, 2022, Ms. Figueroa sent Mr. Fletcher an unsolicited Happy Birthday wish. In response, he wished her a Happy New Year. The Second Amended Complaint intentionally omitted the key detail that Ms. Figueroa initiated the communication on this day. **Compare:**

(Second Amended Complaint, Paragraph 52)



(December 31, 2022, 3:22 PM.
See Pltf Comm_00020)



To recap, **Mr. Fletcher did not sexually assault Ms. Figueroa at the MTS Executive Committee meeting on December 1, 2022, nor at any other time or event, and there is no evidence suggesting anything to the contrary.** Mr. Figueroa's own communications demonstrate that on December 1, 2022, she and Mr. Fletcher had a brief physical encounter in a conference room that was voluntarily in all respects, following a months-long pursuit by Ms. Figueroa (detailed further below). The encounter amounted to nothing more than a brief kiss and some light touching, and did *not* include any sexual intercourse or oral sex. Ms. Figueroa's discovery responses support these facts. For these reasons, it is clear that Ms. Figueroa not only consented to the December 1st interaction, but also that she continued to eagerly pursue Mr. Fletcher in the month that followed. She escalated her flirting and suggested, in colloquial Spanish, that she wanted to perform oral sex. Her claims that she "went out of her way to avoid [Mr. Fletcher]" and that she was victimized by him on December 1, 2022 are demonstrably false. (SAC ¶ 51).

Alleged "Stalking": Ms. Figueroa Pursued Mr. Fletcher Throughout 2022

In addition to the above, Ms. Figueroa's communications in the days, weeks, and months *before* the December 1st MTS meeting further demonstrate that *she* escalated, desired, and initiated their interactions. For example, on August 4, 2022, Ms. Figueroa jokingly called Mr. Fletcher a "bad boy"; stated that she enjoyed briefly seeing him that day; and commented that his dog was a "cutie" who "takes after the dad":

(August 4, 2022, 6:58 PM. See Pltf Comm 00048)



That same day on August 4, she also specifically expressed interest in seeing Mr. Fletcher again in a less crowded setting, foreshadowing their future December 1st meeting:

(August 4, 2022, 6:58 PM. See Pltf Comm_00043)



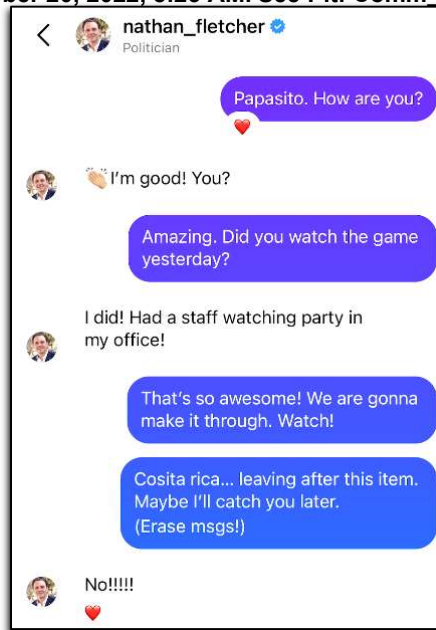
On September 15, 2022, Ms. Figueroa sent Mr. Fletcher an unsolicited compliment about his glasses, accompanied by a wink-face emoji:

(September 15, 2022, 5:22 PM. See Pltf Comm_00043)



On October 20, 2022, she used Spanish to call him “Papasito”, before using Spanish to call him “rich little thing” or “delicious little thing” (i.e. “cosita rica”). In the same text, *she* also requested that he erase their chat:

(October 20, 2022, 8:23 AM. See Pltf Comm_00042)



Two days later, in the afternoon of October 22, 2022, Ms. Figueroa sarcastically implied that Mr. Fletcher was a “cutie” while jokingly referencing a picture of a dog:

(October 22, 2022, 3:16 PM. See Pltf Comm_00041)



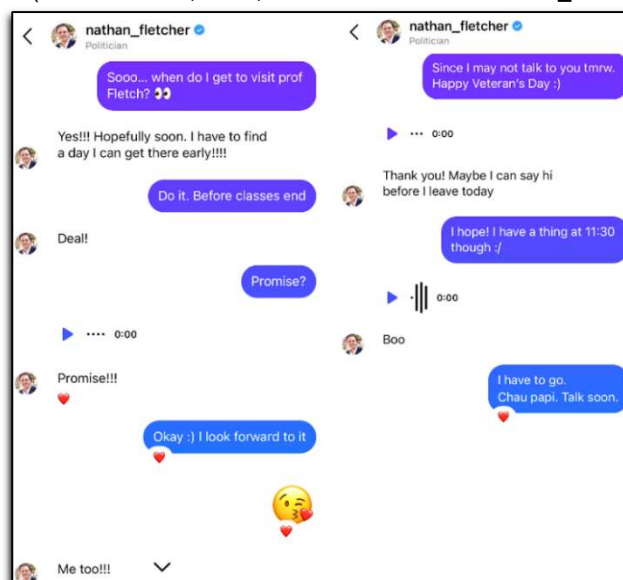
On November 2, 2022, Ms. Figueroa called Mr. Fletcher “campeon!” (translating to “champion!”). On November 9, 2022, she called him “Superman!!”:

(November 2, 2022, 9:12 AM. See Pltf Comm_00041)



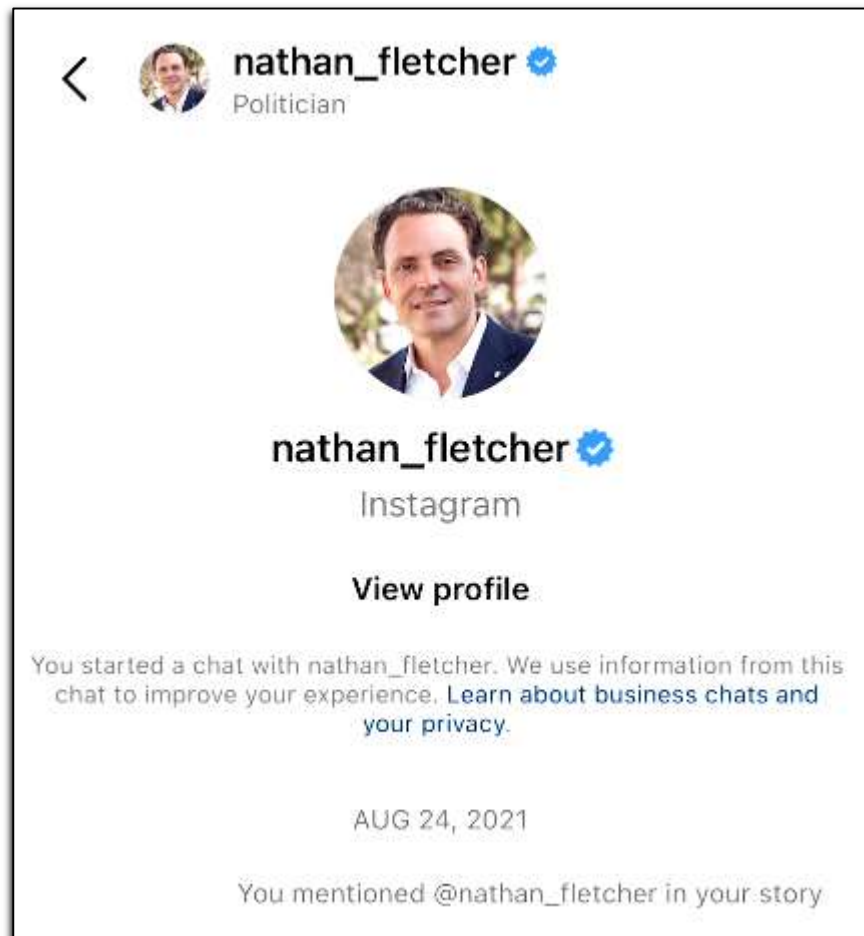
On November 10, 2022, **exactly three weeks before the December 1st MTS Executive Committee meeting**, Ms. Figueroa again affirmatively sought an in-person encounter with Mr. Fletcher. This time, she flirtatiously asked him when she could “visit prof Fletch?”⁴ She was so eager that she made him “promise” to find a time to meet privately before classes ended for the semester. She also stated that she was looking forward to seeing him and accompanied her message with a kissing emoji. Indeed, contrary to her claims that she felt “trapped” and was carrying an “unremitting sense of anxiety” after the June 9th encounter, Ms. Figueroa continued to pursue him in the days immediately preceding their December 1st meeting. Her pursuit also included wishing him a “Happy Veteran’s Day:)” and stating that she hoped to see him be the end of the day. Again, these messages foreshadow their imminent meeting on December 1st:

(November 10, 2022, 10:42 AM. See Pltf Comm_00039)



⁴ At this time, Mr. Fletcher was teaching part-time at UCSD. He did not ever meet with Ms. Figueroa in his capacity as a professor.

Throughout 2022, Ms. Figueroa made numerous other statements and communications demonstrating her consent and willingness to interact with Mr. Fletcher. For example, she made movie suggestions to him and followed up – unsolicited – several days later to see if he enjoyed her recommendation.^{xxix} She inquired about his children, including his son’s birthday.^{xxx} She communicated disappointment when Mr. Fletcher indicated that he would be moving away from downtown.^{xxxi} She volunteered to him, unsolicited, that she was at his speech.^{xxxi} She also frequently texted flirtatious emojis, including kissing/lips emojis.^{xxxi} Notably, the entire narrative that Mr. Fletcher “stalked” Ms. Figueroa on social media is **false**, especially considering that **she “started an [Instagram] chat” with him on August 24, 2021:**



3. Ms. Figueroa’s Allegations Are Subject to a Motion to Strike, Given That They Are False, Irrelevant, and/or Immaterial

Ms. Figueroa’s lawsuit is independently unsustainable and subject to dismissal because Mr. Fletcher was not her employer or direct supervisor. She has admitted this fact under oath in her responses to Mr. Fletcher’s Requests for Admission, Set One.^{xxiv} Consequently, it is impossible for her to ever establish liability against him on her FEHA and Intentional Interference causes of action. As we have repeatedly explained, Mr. Fletcher did not hire Ms. Figueroa, pay

her salary, determine her work schedule, or have any authority to promote or terminate her employment with Defendant San Diego Metropolitan Transit System. She has also conceded that “her job required very little, if any, direct interaction” with Mr. Fletcher. (Second Amended Complaint ¶16). Given that he was not involved in her employment or termination in any way, Ms. Figueroa’s claim in her original Complaint that MTS attempted to coerce her into signing a severance agreement that specifically released Mr. Fletcher from legal liability in exchange for a \$10,000 payment was always demonstrably untrue. These facts are dispositive as to her employment law causes of action, and the fact that she continues to maintain such a baseless claim is further evidence of bad faith. Consequently, the first, fifth, sixth, and ninth causes of action are subject to demurrer and/or motion to strike and must be dismissed in their entirety.

Ms. Figueroa’s personnel file conclusively demonstrates that Mr. Fletcher never exerted any influence over her employment, nor did he play any part in her termination. Indeed, she was terminated by MTS as a result of her own poor, inconsistent performance.⁵ She received repeated warnings in-person, via email, and in formal performance evaluations, regarding her performance deficiencies. Her supervisor also observed that it had “become clear that [Ms. Figueroa’s] inconsistent performance will not change, and management of [her] department no longer believed that [she] meet the job’s minimum performance standards.” Further, in all four of her performance reviews, Ms. Figueroa was warned that her written communication and project management skills needed improvement. She was given specific guidance on how to improve and what would constitute adequate performance. Despite this, she failed to improve her time management problems; she missed important deadlines; and she turned in work that needed to be heavily edited or reworked. In short, the evidence is overwhelming that MTS terminated her employment without any input or foreknowledge from Mr. Fletcher.

Ms. Figueroa was a poorly performing employee who was terminated after being granted multiple opportunities to improve. Her termination was not linked to Mr. Fletcher, nor was she even in an employment relationship with him. Consequently, all of her employment law causes of action against Mr. Fletcher are unsustainable and must be dismissed in their entirety.

Additionally, we have reviewed Ms. Figueroa’s Second Amended Complaint and are disappointed – though unsurprised – that she continues to include the same false, irrelevant, and immaterial allegations relating to Mr. Fletcher’s wife and privileged communications. Given that we have repeatedly identified these specific defects, please accept this correspondence as our final good faith effort to meet and confer, pursuant to Code of Civil Procedure sections 430.41 and 435.5, regarding Mr. Fletcher’s prospective demurrer and/or motion to strike. All references to Mr. Fletcher’s wife must be removed, given that she is not a party to this action and because there are no allegations that she participated in – or was even aware of – any conduct described in the SAC. Indeed, the only reason Plaintiff specifically mentions Mr. Fletcher’s wife was to cause *her* embarrassment and attempt to disrupt *her* career. Doing so adds nothing to the legal claims and is improper. All paragraphs referencing confidential, pre-litigation settlement communications must also be removed, given that the communications are both privileged and inadmissible at trial. For this reason, Paragraphs 17, 26, 58, 59, 60, 61, 62, 63, 64, 65, 66, and 67 are irrelevant

⁵ The entirety of Ms. Figueroa’s termination letter is enclosed herein for your office to review. See Attachment 4.

and immaterial to all of Plaintiff's claims and must be voluntarily stricken. Paragraph 42 of the SAC is also false, irrelevant and immaterial to all of Plaintiff's claims and must be voluntarily stricken. Finally, each and every false allegation described above is similarly subject to our anticipated motion to strike, pursuant to Cal. Code Civ. Proc. Section 436(a) and (b).

4. In light of the Evidence, Sanctions May Be Awarded Against Ms. Figueroa and The Pride Law Firm

California's Rules of Professional Conduct provide clear instruction and guidance when it comes to attorney misconduct. Rule 3.1(a)(1) states that a lawyer shall not bring *or continue* an action, or assert a position in litigation, without probable cause or for the purpose of harassing or maliciously injuring any person. Similarly, Rule 3.3(a)(1) provides that a lawyer shall not "knowingly make a false statement of fact or law to the tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer." Importantly, Rule 8.3(a) imposes a new *obligation* to report misconduct arising from dishonest behavior, or from reckless or intentional misrepresentations. To this end, the State Bar has identified false statements made by an attorney *when opposing discovery motions* as one, specific scenario that raises a substantial question as to an attorney's honesty and is among the list of conduct enumerated for mandatory reporting under rule 8.3.

Ms. Figueroa and Her Attorneys Have Always Known This Case is Without Merit

Here, Ms. Figueroa and her team of attorneys were aware – at all relevant times – that she was a consensual participant in her encounters with Mr. Fletcher. *She* escalated the nature of their interactions and sexualized their written communications. She also lied to Mr. Fletcher that she was deleting their communications in real time, while simultaneously insisting that he delete his side of the chats from his phone, in effort to ensure that she was the sole possessor of the key, exonerating evidence.^{xxv} Despite this, and although Ms. Figueroa possessed the entirety of her communications prior to the filing of this lawsuit, Mr. Schumacher and/or The Pride Law Firm repeatedly published misleading and out-of-context communications in multiple amended complaints, seemingly for the purpose of harassing Mr. Fletcher and his family to obtain a seven-figure settlement. Such conduct is improper and represents a bad faith filing and maintenance of this groundless action.

Ms. Figueroa's Attorneys' Attempted To Withhold Exonerating Evidence

In addition to Ms. Figueroa's false allegations in her multiple complaints, The Pride Law Firm's written opposition and oral arguments opposing Mr. Fletcher's discovery motions have also been littered with intentionally false statements, including overt misrepresentations to the court that exonerating documents were previously produced in discovery, when they had not. Their conduct has already resulted in sanctions, and also directly caused Mr. Fletcher personal damage by allowing Ms. Figueroa's self-serving – and false – narrative to be continually reported on by those in the media. Each of these actions are grossly unprofessional and in clear violation of Rules 3.1 and 3.3.

For these reasons, Ms. Figueroa, Mr. Schumacher, Mr. Freire-Avina, Ms. Jessica Pride, and Mr. Dante Pride have maliciously and repeatedly engaged in an ongoing effort to destroy Mr.

Fletcher's reputation, career, family, and finances. They have made knowingly false and deceptive statements, publicly and to the court, in an obvious attempt to obtain a quick, undeserved, and coercive financial settlement. Their misrepresentations have been repeatedly published millions of times in the media. **Such conduct is grossly improper and demonstrates that this lawsuit was filed, and is continuing, in bad faith and with malicious intention.** Under California law, the court may award attorneys' fees to the defendant where a claim is pursued beyond the point where the plaintiff no longer believes the case has merit. (See, e.g., *Yield Dynamics, Inc. v. TEA Systems Corp.* (2007) 154 Cal.App.4th 547, 579, fn. 20; *Gemini Aluminum Corp. v. California Custom Shapes, Inc.* (2005) 95 Cal.App.4th 1249, 1264). Similarly, sanctions may be awarded against a plaintiff for the bad faith filing or maintenance of a groundless action. (See *Zamos v. Stroud* (2004) 32 Cal.4th 958, 970 ("attorney may be liable for malicious prosecution for continuing to prosecute a lawsuit discovered to lack probable cause".)) Mr. Fletcher intends to pursue such relief in the event this action is not immediately dismissed.

Ms. Figueroa and her attorneys' behavior in this matter has already been sanctionable and likely represents serious abuses to California's well-established rules of procedure and professional conduct. The evidence is overwhelming – and unambiguous – that Mr. Fletcher's interactions with Ms. Figueroa were always consensual and that no sexual battery/assault ever occurred. Ms. Figueroa's wrongful withholding of relevant documents and information while pushing a knowingly false narrative, further suggests that she knew that her case was unsustainable if her communications were ever disclosed. Her behavior also suggests that she was attempting to coerce Mr. Fletcher into acquiescing to her settlement demands. **As a result, this action must be dismissed in its entirety. Otherwise, we have no choice but to explore all avenues to secure a dismissal and recover our legal fees, as well as damages for the significant harm caused Mr. Fletcher.**

5. Conclusion

Mr. Fletcher has always maintained that he never sexually battered or assaulted Ms. Figueroa, nor did he engage in any other legal wrongdoing. He has always vehemently disputed her salacious claims and described her allegations as categorically false.^{xxvi} Nevertheless, he has also always acknowledged that he made a personal mistake in engaging in consensual interactions with someone outside of his marriage. He acknowledged that he violated the trust and loyalty of his wife and set a poor example for his children. Critically, however, Mr. Fletcher's acknowledgment of a personal mistake in engaging in consensual encounters with Ms. Figueroa does not give rise to any legal liability.

For all of the reasons set forth above, Ms. Figueroa, Mr. Schumacher, and The Pride Law Firm have not participated in this lawsuit in good faith. Evidence of a consensual relationship was deliberately omitted from Ms. Figueroa's initial Complaint, her First Amended Complaint, and now her Second Amended Complaint. Statements were made to the media and in other public forums that furthered the promotion of a sensationalized narrative regarding the false claims for sexual assault and battery. Ms. Figueroa and The Pride Law Firm also engaged in a campaign to obstruct and prevent disclosure of critical communications that support Mr. Fletcher's defense to these outrageous and unsubstantiated claims. This entire lawsuit is without merit and must be dismissed in its entirety.

While Mr. Fletcher has always maintained that Ms. Figueroa's claims were without any merit, the production of evidence since she filed her Complaint demonstrates that Ms. Figueroa's and Mr. Fletcher's interactions were consensual at all times. **Therefore, we demand that this lawsuit be dismissed in its entirety no later than January 8, 2023.** We will be accompanying this letter with a C.C.P section 998 Offer that will allow you to dismiss this case in its entirety in exchange for a waiver of our costs. We strongly urge you to accept this offer before Mr. Fletcher incurs even more expenses, particularly those anticipated from a future trial. If Ms. Figueroa declines, we will be forced to pursue all available claims and forms of recovery against her, given that she needlessly continues to inflict emotional and economic damage on Mr. Fletcher.

Sincerely,



Sean L. McKaveney
For FISHER & PHILLIPS LLP

SLM:ms
Attachments

-
- ⁱ See Attachment 3, Grecia Figueroa X.com Post, August 22, 2023;
<https://x.com/GreciaFigueroaN/status/1694128341912326427?s=20>
- ⁱⁱ See Attachment 7, Grecia Figueroa Threads post.
- ⁱⁱⁱ See Attachment 2, Grecia Figueroa Threads post.
- ^{iv} Grecia Figueroa X.com Post, July 15, 2023;
<https://x.com/GreciaFigueroaN/status/1680388098293911553?s=20>
- ^v Complaint, ROA #1
- ^{vi} Second Amended Complaint, Paragraphs 55, 128, ROA #138
- ^{vii} Grecia Figueroa; This Is My Take, blog; “A Crumbling Façade”, April 29, 2023;
<https://thisismytakeblog.com/2023/04/29/a-crumbling-facade/>
- ^{viii} Grecia Figueroa; This Is My Take, blog; “A Crumbling Façade”, April 29, 2023;
<https://thisismytakeblog.com/2023/04/29/a-crumbling-facade/>
- ^{ix} Grecia Figueroa; X.com post, June 8, 2023;
<https://x.com/GreciaFigueroaN/status/1666911370686910467?s=20>
- ^x Attachment 1
- ^{xi} See comments by Mr. Zachary Freire-Avina at https://www.youtube.com/watch?v=z4kFAeCn_VU
- ^{xii} Discovery Hearing Minute Order, October 27, 2023; ROA #110
- ^{xiii} See Attachment 2, *Carrington vs Christian Unified Schools of San Diego*; San Diego Superior Court Case No. 37-2023-00024430-CU-WT-CTL; ROA # 67
- ^{xiv} See Attachment 5; Declaration of Tracy A. Warren in Support of Opposition to Plaintiff Vickie Carrington’s Motion to Set Aside Sanctions Order, Page 4, Paragraph 18.
- ^{xv} See *Daigle v. Serco Inc., et al*; San Diego Superior Court Case No. 37-2020-00047226-CU-OE-CTL; ROA #240
- ^{xvi} Second Amended Complaint, ROA # 138
- ^{xvii} See Plaintiff’s Supplemental Responses to Defendant’s Requests for Production, Set One, No. 4
- ^{xviii} Attachment 1, Pltf Comm_00031
- ^{xix} Attachment 1, bates number Pltf Comm_00113
- ^{xx} Attachment 1, bates number Pltf Comm_00098
- ^{xxi} Attachment 1, bates number Pltf Comm_00085
- ^{xxii} Attachment 1, bates number Pltf Comm_00043-00044
- ^{xxiii} Attachment 1, Pltf Comm_00023 and 00029
- ^{xxiv} See Plaintiff’s Further Supplemental Responses to Defendant’s Requests for Admission, Set One, No. 6 and 7
- ^{xxv} Attachment 1, bates number Pltf Comm_00096-00097
- ^{xxvi} See Fletcher_000001

ATTACHMENT 1



nathan_fletcher



Politician



I'm feeling a bit impulsive

You replied

I'm on 16th floor. Not many people take the stairs

True

Just one beer



That's it? :)

Haha

Deal! But not until after 10!




What kind of beer do you like?

9:30




nathan_fletcher ✓

Politician



It's the residence inn. Bayfront Marriott. Across from intercontinental 900 Bayfront court

Okay. Got it.



Let's say 10:15. When you come into lobby head to your left to elevators. I'll take one down right about then as you need a key to come up!

We can have a beer in the stairwell on 16th floor:)

10:30 ?



Perfect



I have five minutes

Pltf Comm_00003



nathan_fletcher 

Politician

Staying for a bit



Come say hi

Pltf Comm_00004



nathan_fletcher 

Politician



I could ditch security guys to go for late night walk but couldn't be gone long

Late night walk? Where ??



Or we could try and plan another night I'm alone but not such short notice.

Nahhh... let's plan that better another time



But you could drive close to my house and we could sit in car for a little bit:)

9:03

5G 



nathan_fletcher 

Politician

If I went to lunch with you (beautiful woman) our lunch would be on social media in 10 minutes

People took pictures if me eating — with Carlos

With you—full blown scandal:)



Pltf Comm_00006



nathan_fletcher



Politician

OCT 17, 2021

Reacted to your story



Only you can see this



OCT 24, 2021

Reacted to your story



Only you can see this





nathan_fletcher



Politician

MAY 12 AT 9:21 PM



Still up?

Hi! Haha yes.

Its 9:30



Just got the boys down. Just me and them tonight!

Awwwwwww

(You are such a good father btw!)
truly mean that



I try:)

So what do you usually do on nights like these?

Read:(



Bar is open but all the bartenders know me



Read is good

Pltf Comm_0008



Grecia Figueroa <figueroa.grecia@gmail.com>

Need Quote Approval

4 messages

Grecia Figueroa <figueroa.grecia@gmail.com>
To: Nathan Fletcher <nathan@nathanfletcher.com>

Wed, Sep 7, 2022 at 10:27 AM

Hi. Hope you are doing great! Sorry to bother you, but we need your approval for a quote, and I'm on VERY tight deadline with the news release. I am hoping you could check it out today? Pleaseee. You should have an email or a text from Emily about it. :) thank you.

--

Grecia Figueroa
figueroa.grecia@gmail.com
(818)324-7518

Nathan Fletcher <nathan@nathanfletcher.com>
To: Grecia Figueroa <figueroa.grecia@gmail.com>

Wed, Sep 7, 2022 at 4:58 PM

Hi there! Sorry for delay—did they get back to you?

On Sep 7, 2022, at 10:28 AM, Grecia Figueroa <figueroa.grecia@gmail.com> wrote:

[Quoted text hidden]

Nathan Fletcher <nathan@nathanfletcher.com>
To: Grecia Figueroa <figueroa.grecia@gmail.com>

Wed, Sep 7, 2022 at 4:59 PM

I was on a five hour flight when your email came in and went off the plane into events. Sorry for slow response

On Sep 7, 2022, at 10:28 AM, Grecia Figueroa <figueroa.grecia@gmail.com> wrote:

[Quoted text hidden]

Grecia Figueroa <figueroa.grecia@gmail.com>
To: Nathan Fletcher <nathan@nathanfletcher.com>

Wed, Sep 7, 2022 at 9:45 PM

They did! Thank you:)

[Quoted text hidden]



Grecia Figueroa <figueroa.grecia@gmail.com>

For the dog park :)

1 message

Grecia Figueroa <figueroa.grecia@gmail.com>
To: Nathan Fletcher <nathan@nathanfletcher.com>

Wed, Oct 5, 2022 at 9:32 AM

...this would be a dream.

<https://k9grass.com/>

<https://www.foreverlawn.com/media/featured-projects/little-italy-dog-park/>

--

Grecia Figueroa
figueroa.grecia@gmail.com
(818)324-7518



Grecia Figueroa <figueroa.grecia@gmail.com>

Youth Opportunity Pass Essays

1 message

Grecia Figueroa <figueroa.grecia@gmail.com>
To: Nathan Fletcher <nathan@nathanfletcher.com>

Fri, Nov 18, 2022 at 10:39 AM

At some point, I'm going to send you excerpts from the essays we are getting from students about the Youth Opportunity Pass (Laptop essay contest), and you are going to LOVE IT! What they are saying is going to make your heart smile. Hope you are having a great week Fletch!

--

Grecia Figueroa
figueroa.grecia@gmail.com
(818)324-7518



Grecia Figueroa <figueroa.grecia@gmail.com>

Thursday

1 message

Grecia Figueroa <figueroa.grecia@gmail.com>
To: Nathan Fletcher <nathan@nathanfletcher.com>

Tue, Jan 24, 2023 at 12:44 PM

You are putting me in stress!
Now I have to find another speaker for the Laptop ceremony 2 days before the event because your staff just told me you have a meeting Thursday at noon. smh. 😞

--

Grecia Figueroa
figueroa.grecia@gmail.com
(818)324-7518



Grecia Figueroa <figueroa.grecia@gmail.com>

Happy social media free lent!

2 messages

Grecia Figueroa <figueroa.grecia@gmail.com>
To: nathan@nathanfletcher.com

Wed, Mar 2, 2022 at 4:17 PM

--

Grecia Figueroa
figueroa.grecia@gmail.com
(818)324-7518

Nathan Fletcher <nathan@nathanfletcher.com>
To: Grecia Figueroa <figueroa.grecia@gmail.com>

Wed, Mar 2, 2022 at 4:19 PM

Yes! It is so toxic these days.
[Quoted text hidden]



Grecia Figueroa <figueroa.grecia@gmail.com>

Question

6 messages

Grecia Figueroa <figueroa.grecia@gmail.com>
To: Nathan Fletcher <nathan@nathanfletcher.com>

Fri, Mar 11, 2022 at 2:00 PM

Hi! Hope you are having a great Friday. I need a good book recommendation and I thought of you. What do you recommend? :)
(anything except science fiction)

--

Grecia Figueroa
figueroa.grecia@gmail.com
(818)324-7518

Nathan Fletcher <nathan@nathanfletcher.com>
To: Grecia Figueroa <figueroa.grecia@gmail.com>

Fri, Mar 11, 2022 at 2:14 PM

Oh, I have a lot of book recommendations. Here are three to consider off the bat:

The Four Winds by Kristin Hannah
All the light you can not see by Anthony Doerr
The border series (three books) by Don Winslow
The Chain by Adrian McKinity (kind of dark)

Let me know if you pick one!!!!

[Quoted text hidden]

Grecia Figueroa <figueroa.grecia@gmail.com>
To: Nathan Fletcher <nathan@nathanfletcher.com>

Fri, Mar 11, 2022 at 2:28 PM

I chose the first one.
Do you have a favorite book of all time?

[Quoted text hidden]

Nathan Fletcher <nathan@nathanfletcher.com>
To: Grecia Figueroa <figueroa.grecia@gmail.com>

Fri, Mar 11, 2022 at 2:48 PM

I'll have to think about that one. More likely a top 10:)

[Quoted text hidden]

Nathan Fletcher <nathan@nathanfletcher.com>
To: Grecia Figueroa <figueroa.grecia@gmail.com>

Fri, Mar 11, 2022 at 2:49 PM

I also read a lot of non-fiction. So probably a top list for fiction and a different one for non-fiction. Generally mix it up reading a few at a time.

[Quoted text hidden]

2/14/23, 3:42 PM

Gmail - Question

Fri, Mar 11, 2022 at 3:00 PM

Grecia Figueroa <figueroa.grecia@gmail.com>
To: Nathan Fletcher <nathan@nathanfletcher.com>

haha..top 20! Nice. Have you read Born a Crime by Trevor Noah?

[Quoted text hidden]



Grecia Figueroa <figueroa.grecia@gmail.com>

Students write about Youth Opportunity Passes, 2020 MTS essay contest

1 message

Grecia Figueroa <figueroa.grecia@gmail.com>
To: Nathan Fletcher <nathan@nathanfletcher.com>

Wed, May 11, 2022 at 4:21 PM

Hello,

I wanted to share this with you. I've seen some criticism about the Youth Opportunity Pass (YOP) on social media (not too much, but some), and although it might not come from transit riders, the comments aren't coming from students. Today, I scanned through our 2020 Essay Contest submissions where we asked students in SD to pick their top 3 Elevate SD projects and write a persuasive essay.

Many of them picked YOP, so I pulled these excerpts to see what they had to say. I was quite impressed. We might use them for a blog or post here at MTS....however, I thought I'd share them with you too because I feel like negativity can sometimes drown the real positive impact this is having on so many families. I know you already know that, but I hope you enjoy reading these too:

Excerpts from the 2020 MTS Essay contest, where we asked kids to choose their top 3 Elevate SD projects. Here are some who chose the Youth Opportunity Pass as one of them:

"As a student, I have heard many of my classmates ask around for change to get on the bus. Some of them have to walk more than 30 minutes back home if they don't have enough fare on them and others have terrible attendance because they have trouble even arriving to school on time with how far they live. The Youth Opportunity Passes would be incredibly beneficial to many kids and young adults that are still in school. Not needing to worry about how they would get to school on time, they wouldn't have to worry about walking alone in the dark, this project would help immensely to the student population. There are students who cross the border every day to get to school and to go back home. Students whose parents can't cross or drive them back would especially benefit from this program because it would decrease their, and their parent's, worries on getting back home safely." Hoover High, Grade 10

"MTS should implement this program to ensure children have wider access to environmentally-friendly travel options" – West view high, Grade 9

"Affordability and inequity run hand in hand; while some San Diegans don't need to think twice about money, many are faced with financial hurdles that affect their daily lives, and daily activities such as transportation. These programs aid people who may have to sacrifice a meal in order to ride the bus home, or who are physically unable to work enough to afford transportation of any other kind" - University city high, grade 12

"YOP would increase access to so many educational opportunities for the San Diego youth. For the kids who live in low income families this would provide financial relief for their families. This program would help MTS in the long run because it will help create lifelong transit riders. Creating roughly 2.3 million more trips a year by providing this new program is implemented in San Diego (elevate2020sd.com, 2019). By helping approximately 600,000 students, this program would be a homerun! - Grossmont High, Grade 11

"For the millions of working class San Diegans that live paycheck to paycheck, public transportation has become the sole difference between holding a job and having to fill out unemployment forms. I speak from experience as a child of a single parent household, it was carpooling and trolley lines that kept a roof over

my head and food on the table. There's no doubt that hundreds if not thousands of other families here in San Diego share my experiences when it comes to the vitality of public transport.”- Eastlake High, Grade 12

“Low income families would have the tranquility of knowing that their children have a way of getting home while they are working to earn a living. Students would be able to reach their fullest academic capabilities and utilize all the educational opportunities available to them because they wouldn't have to worry about not having enough money to be able to transport themselves from one place to another. It's a proposal that benefits the individuals in society that need it the most and who at times are unable to ask for help.”- San Marcos High School, 12

“This would help children get into the habit of using transit systems, and that in the future, they can save more and direct those funds that they would in turn use on a car, towards funding their way through college, attaining better career opportunities. This potentially opens new doors for low-income families.” – Grossmont High, grade 10

“The pass would open a door to new educational and career opportunities for San Diego minors. This will create a fair rate of return for the public, as many more people will attain higher education and higher paying jobs, collectively reducing crime rates and opening more doors for people to invest in San Diego.” Grossmont High, 9 grade

“In a household that is already struggling monetarily, having to pay an extra \$2.50 every time a household member has to travel could become debilitating and nearly impossible. The Youth Opportunity Passes, which would provide free transport to youth 18 and under, could lessen the burden of sending teenagers to school, work, or any other recreational activity that cannot be easily accessed. Some researchers may argue that the Youth Opportunity Passes will be a waste of money because only about 6.3% of San Diego public transportation riders are 18 and under, therefore it won't be helping a large portion of people. However, according to San Diego Youth Services, youth homelessness is on the rise in San Diego with an increase of 35% in 2018. (sdyouthservices.org) Homeless youth could use free transportation to get to schools, job interviews, or leave dangerous situations. Youth Opportunity Passes could combat financial hardship in San Diego families and homelessness in San Diego communities”- Valhalla High School, 12 grade

“When my dad suddenly died nearly two years ago, my mom became financially responsible for three teenagers by herself. All parents and teens will benefit from this new program”. Valley Center High School, 12

“Some people may see this as unnecessary because they think young people use public transportation mainly to go out and have fun, implying they should pay for the normal price but that is not the case. This is an eminently significant issue because a lot of students that don't have cars or parents that can drive them depend on these buses to get to and from school every day. Most of them live far away too, and simply stay for the better classes and teachers.” – Castle Park High, 11

“In many high schools, 1st-period attendance is very low because many students have to wait on others for car rides or walk to school, causing them to repeatedly be tardy. The harsh reality is that many students don't have the funds to purchase a bus pass, or pay the amount of the one-way fare; especially in highly populated urban areas where the struggles of poverty continue to persist. Few programs exist to support the students obtaining access to public transportation. These programs should either be expanded or highly advertised to ensure that students are knowledgeable about these opportunities. If an act in the Elevate SD 2020 Plan that supported these types of students was enacted, then the City of San Diego would have a brighter future full of well educated, brilliant kids, who could help to further change based on their own

struggles and experiences. This would ensure a better society for everyone.” Gompers Preparatory Academy, Grade 11

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Nathan Fletcher

Grecia Figueroa

Have a great day!

Jan 19, 2023, 1:43 PM

Nathan Fletcher

Soon

Jan 19, 2023, 1:42 PM

Nathan Fletcher

Gotta run: talk and hopefully see you SOI

❤️ Grecia Figueroa

Jan 19, 2023, 1:42 PM

Nathan Fletcher

0:00 / 0:00

Jan 19, 2023, 1:42 PM

Nathan Fletcher

I won't keep it forever. Just a little change

❤️ Grecia Figueroa

Jan 19, 2023, 1:20 PM

Grecia Figueroa

It's different...I like beards... both look good!

Jan 19, 2023, 1:20 PM

Nathan Fletcher

Makes me look old

Jan 19, 2023, 1:18 PM

Nathan Fletcher

You like?



Grecia Figueroa

👤 new look I see

Jan 19, 2023, 1:14 PM

Grecia Figueroa



Jan 19, 2023, 1:14 PM

Grecia Figueroa

Hi

Jan 19, 2023, 1:14 PM

Nathan Fletcher

Hi

Jan 19, 2023, 1:02 PM

Nathan Fletcher

Don't reply:) will see you in 2023!!!

Dec 31, 2022, 6:12 PM

Nathan Fletcher

Happy new year mi armor. Here is to a 2023 where all are desires come true

Dec 31, 2022, 6:06 PM

Grecia Figueroa

Happy birthday, campeón.

Dec 31, 2022, 3:22 PM

Nathan Fletcher

I'm blushing

👤 Grecia Figueroa

Dec 8, 2022, 10:28 AM

Grecia Figueroa

But you asked for the real answer 😊



Grecia Figueroa

Con "ganas de comerte"

Dec 8, 2022, 10:26 AM

Grecia Figueroa

Unfortunately I can't find the words in English for this...

Dec 8, 2022, 10:26 AM

Nathan Fletcher

The real one!

Dec 8, 2022, 10:22 AM

Nathan Fletcher

0:00 / 0:00

Dec 8, 2022, 10:22 AM

Grecia Figueroa

You want the real answer or the decent one?

Dec 8, 2022, 10:15 AM

Nathan Fletcher

How are you?

Dec 8, 2022, 10:11 AM

Nathan Fletcher

Liked a message

Dec 8, 2022, 10:11 AM

Grecia Figueroa

Hey handsome

❤️ Nathan Fletcher

Dec 8, 2022, 10:08 AM

Nathan Fletcher



Nathan Fletcher

Liked a message

Dec 6, 2022, 12:16 AM

Grecia Figueroa

Buena noches, rey. 👑

❤️ Nathan Fletcher

Dec 6, 2022, 12:16 AM

Nathan Fletcher

Goodnight beautiful

Dec 6, 2022, 12:12 AM

Nathan Fletcher

Liked a message

Dec 6, 2022, 12:12 AM

Grecia Figueroa

I know :)

❤️ Nathan Fletcher

Dec 6, 2022, 12:12 AM

Nathan Fletcher

Me either:)

Dec 6, 2022, 12:11 AM

Grecia Figueroa

It's not then first time

Dec 6, 2022, 12:11 AM

Grecia Figueroa

I mean

Dec 6, 2022, 12:10 AM

Nathan Fletcher



Grecia Figueroa

And so am i

Dec 6, 2022, 12:08 AM

Nathan Fletcher

Liked a message

Dec 6, 2022, 12:05 AM

Nathan Fletcher

I'll be dreaming of you

♥ Grecia Figueroa

Dec 6, 2022, 12:04 AM

Nathan Fletcher

I'm sorry

Dec 6, 2022, 12:03 AM

Grecia Figueroa

But I'll see you soon. 🗨️

♥ Nathan Fletcher

Dec 6, 2022, 12:03 AM

Nathan Fletcher

?

Dec 6, 2022, 12:02 AM

Grecia Figueroa

Cosita rica. No.

Dec 6, 2022, 12:01 AM

Nathan Fletcher

Bit

Dec 5, 2022, 11:59 PM

Nathan Fletcher



Nathan Fletcher

Reluctantly tonight might not work.
I'm sorry - got myself all excited

Dec 5, 2022, 11:58 PM

Grecia Figueroa

Yes

Dec 5, 2022, 11:57 PM

Nathan Fletcher

Back to I really want
To see you—even if just a short visit

Dec 5, 2022, 11:55 PM

Grecia Figueroa

Grandparents!

Dec 5, 2022, 11:55 PM

Grecia Figueroa

Sure?

Dec 5, 2022, 11:54 PM

Nathan Fletcher

He is still up. Talking, talking
😬Grecia Figueroa

Dec 5, 2022, 11:54 PM

Nathan Fletcher

Let me find a night where we can do this earlier

Dec 5, 2022, 11:53 PM

Grecia Figueroa

Okay

Dec 5, 2022, 11:53 PM



♥ Grécia Figueroa

Dec 5, 2022, 11:51 PM

Grecia Figueroa

30 mins ?

Dec 5, 2022, 11:49 PM

Nathan Fletcher

How long would it take for you to get over here? City Heights area

Dec 5, 2022, 11:49 PM

Grecia Figueroa

Let him go to bed

Dec 5, 2022, 11:49 PM

Grecia Figueroa

Okay

Dec 5, 2022, 11:49 PM

Nathan Fletcher

Well shit. My 80 year old father in law is up

Dec 5, 2022, 11:48 PM

Nathan Fletcher

Just got home

Dec 5, 2022, 11:47 PM

Grecia Figueroa

Where you at?

Dec 5, 2022, 11:46 PM

Grecia Figueroa

Hold on

Dec 5, 2022, 11:44 PM



Dec 5, 2022, 11:44 PM

Nathan Fletcher

Entirely up to you.

Dec 5, 2022, 11:43 PM

Nathan Fletcher

We can!

Dec 5, 2022, 11:42 PM

Grecia Figueroa

So we can?

Dec 5, 2022, 11:42 PM

Nathan Fletcher

But I'll be up for a little while

Dec 5, 2022, 11:41 PM

Nathan Fletcher

With more notice and not starting at midnight:)

Dec 5, 2022, 11:40 PM

Nathan Fletcher

But could work another night when I'm alone

Dec 5, 2022, 11:39 PM

Nathan Fletcher

Up to you. Super last minute notice tonight. I'm sorry. Impulsive:)

Dec 5, 2022, 11:39 PM

Nathan Fletcher

But our physical safety would be fine

Dec 5, 2022, 11:38 PM

Grecia Figueroa



Nathan Fletcher

I mean little sketchy this late at night

Dec 5, 2022, 11:38 PM

Grecia Figueroa

Ok

Dec 5, 2022, 11:37 PM

Nathan Fletcher

I think would be ok.

Dec 5, 2022, 11:37 PM

Grecia Figueroa

Can we pull this off?

Dec 5, 2022, 11:37 PM

Grecia Figueroa

But do you think this is safe?

Dec 5, 2022, 11:37 PM

Nathan Fletcher

Ok. Deal!

Dec 5, 2022, 11:37 PM

Grecia Figueroa

Not today, but in the future

Dec 5, 2022, 11:36 PM

Nathan Fletcher

But super late and last minute so I understand if not a good idea tonight

Dec 5, 2022, 11:36 PM

Nathan Fletcher

I could go for a walk and come
Sit in car for a few minutes.



Nathan Fletcher

If you want to come say hi then just drive towards my house. I could give you an address down the street.

Dec 5, 2022, 11:35 PM

Grecia Figueroa

What do you need me to do?

Dec 5, 2022, 11:35 PM

Grecia Figueroa

Nooo no sad face

Dec 5, 2022, 11:34 PM

Nathan Fletcher

So close:(

Dec 5, 2022, 11:34 PM

Grecia Figueroa

so close

Dec 5, 2022, 11:34 PM

Nathan Fletcher

Passing county building

Dec 5, 2022, 11:33 PM

Grecia Figueroa

Awwwww

Dec 5, 2022, 11:33 PM

Nathan Fletcher

On way home from airport

Dec 5, 2022, 11:33 PM

Grecia Figueroa

Where are you?

Dec 5, 2022, 11:32 PM



Dec 5, 2022, 11:32 PM

Nathan Fletcher

We don't have many good options:(

Dec 5, 2022, 11:30 PM

Nathan Fletcher

I am:)

Dec 5, 2022, 11:30 PM

Grecia Figueroa

Bad boy

Dec 5, 2022, 11:28 PM

Nathan Fletcher

I can't wander too long without guys getting nervous

Dec 5, 2022, 11:27 PM

Nathan Fletcher

Along way to drive for a short visit

Dec 5, 2022, 11:27 PM

Grecia Figueroa

Maybe

Dec 5, 2022, 11:25 PM

Grecia Figueroa



Dec 5, 2022, 11:25 PM

Nathan Fletcher

That would be easier

Dec 5, 2022, 11:24 PM

Grecia Figueroa



Grecia Figueroa

Well

Dec 5, 2022, 11:24 PM

Nathan Fletcher

But you could drive close to my house and we could sit in car for a little bit:)

Dec 5, 2022, 11:22 PM

Grecia Figueroa

Nahhh... let's plan that better another time

Dec 5, 2022, 11:21 PM

Nathan Fletcher

Or we could try and plan another night I'm alone but not such short notice.

Dec 5, 2022, 11:21 PM

Grecia Figueroa

Late night walk? Where ??

Dec 5, 2022, 11:21 PM

Nathan Fletcher

I could ditch security guys to go for late night walk but couldn't be gone long

Dec 5, 2022, 11:21 PM

Grecia Figueroa

I always am...

Dec 5, 2022, 11:20 PM

Grecia Figueroa

Ugh

Dec 5, 2022, 11:20 PM

Grecia Figueroa

I'm a night owl



Nathan Fletcher

Yes?

Dec 5, 2022, 11:20 PM

Grecia Figueroa

I'll keep you company

Dec 5, 2022, 11:20 PM

Nathan Fletcher

Then home. Try and go to sleep. But tough for me to just go right to sleep

Dec 5, 2022, 11:20 PM

Grecia Figueroa

Lol.

Dec 5, 2022, 11:19 PM

Grecia Figueroa

Welcome to SD

Dec 5, 2022, 11:19 PM

Nathan Fletcher

Now about to land!

Dec 5, 2022, 11:19 PM

Nathan Fletcher

Sacramento. Went up for swearing in of new members

❤️ Grecia Figueroa

Dec 5, 2022, 11:19 PM

Grecia Figueroa

Where are you coming from?

Dec 5, 2022, 11:18 PM

Nathan Fletcher

Liked a message



Grecia Figueroa

Here

Dec 5, 2022, 11:17 PM

Grecia Figueroa

I wish you were her

❤️ Nathan Fletcher

Dec 5, 2022, 11:17 PM

Nathan Fletcher

I wish I was there

Dec 5, 2022, 11:17 PM

Grecia Figueroa

Jajaja ...

Dec 5, 2022, 11:17 PM

Nathan Fletcher

I'm not teasing you at all!!!

Dec 5, 2022, 11:17 PM

Grecia Figueroa

No?

Dec 5, 2022, 11:17 PM

Nathan Fletcher

No!

Dec 5, 2022, 11:17 PM

Grecia Figueroa



Dec 5, 2022, 11:17 PM

Grecia Figueroa

You are teasing me so much



Nathan Fletcher

Yes

Dec 5, 2022, 11:16 PM

Grecia Figueroa

Bc I can

Dec 5, 2022, 11:16 PM

Grecia Figueroa

Do you want me to think about you?

Dec 5, 2022, 11:16 PM

Nathan Fletcher

Don't tease me:)

Dec 5, 2022, 11:16 PM

Grecia Figueroa

Super comfy

Dec 5, 2022, 11:15 PM

Nathan Fletcher

Liked a message

Dec 5, 2022, 11:15 PM

Grecia Figueroa

I am

❤️ Nathan Fletcher

Dec 5, 2022, 11:15 PM

Nathan Fletcher

You in bed?

Dec 5, 2022, 11:15 PM

Nathan Fletcher

Of course starts early tomorrow



Nathan Fletcher

Yes...long day

Dec 5, 2022, 11:14 PM

Grecia Figueroa

Awww. That's so late

Dec 5, 2022, 11:14 PM

Nathan Fletcher

About to land in SD! Flight was delayed:(

Dec 5, 2022, 11:14 PM

Grecia Figueroa

I'm Good, happy and home. You?

Dec 5, 2022, 11:14 PM

Nathan Fletcher

How are you?

Dec 5, 2022, 11:12 PM

Nathan Fletcher

0:00 / 0:00

Dec 5, 2022, 11:12 PM

Nathan Fletcher



https://instagram.com/stories/grecia_f/2986766061771119595

Dec 5, 2022, 11:08 PM

Nathan Fletcher

Liked a message

Dec 2, 2022, 12:08 PM

Grecia Figueroa



Nathan Fletcher

It was nice to see you:)

❤️ Grecia Figueroa

Dec 2, 2022, 11:19 AM

Nathan Fletcher

Liked a message

Dec 1, 2022, 11:03 AM

Grecia Figueroa

Okay I'll come by again around 11:15

❤️ Nathan Fletcher

Dec 1, 2022, 11:03 AM

Nathan Fletcher

Until noon

Dec 1, 2022, 11:02 AM

Grecia Figueroa

How much longer will you be here?

Dec 1, 2022, 10:59 AM

Grecia Figueroa

Let me know when you are alone

Dec 1, 2022, 10:43 AM

Nathan Fletcher

Come say hi

Dec 1, 2022, 10:43 AM

Nathan Fletcher

Staying for a bit

Dec 1, 2022, 10:43 AM

Grecia Figueroa



Nathan Fletcher

You can!!!

😁 Grecia Figueroa

Dec 1, 2022, 10:21 AM

Grecia Figueroa

Uhhmm... I was going to say something inappropriate... 😁 oh my mind...

Dec 1, 2022, 10:19 AM

Nathan Fletcher

Too much tension:)

Dec 1, 2022, 10:17 AM

Nathan Fletcher

Reacted 😁 to your message

Dec 1, 2022, 10:17 AM

Grecia Figueroa

Stop biting your nails!

😁 Nathan Fletcher

Dec 1, 2022, 10:13 AM

Nathan Fletcher

Liked a message

Dec 1, 2022, 9:57 AM

Grecia Figueroa

Sameeee

❤️ Nathan Fletcher

Dec 1, 2022, 9:56 AM

Grecia Figueroa

Im good. Been watching the World Cup a lot lately. USA is through to knock out stage!! Which is very exciting.

Dec 1, 2022, 9:56 AM



Dec 1, 2022, 9:53 AM

Nathan Fletcher

I'm ok. You?

Dec 1, 2022, 9:52 AM

Grecia Figueroa

How are you?

Dec 1, 2022, 9:50 AM

Grecia Figueroa

I heard about that :(

Dec 1, 2022, 9:50 AM

Nathan Fletcher

Damn strike at UCSD. So haven't been on campus for a month:(

Dec 1, 2022, 9:50 AM

Grecia Figueroa

Woahhh. Ufffff 🍊 🙌 lo máximo, bravo campeón!!!

Nov 14, 2022, 9:47 PM

Nathan Fletcher

Liked a message

Nov 10, 2022, 11:19 AM

Grecia Figueroa

I have to go.
Chau papi. Talk soon.
❤️ Nathan Fletcher

Nov 10, 2022, 11:11 AM

Nathan Fletcher

Boo

Nov 10, 2022, 11:05 AM



0:00 / 0:00

Nov 10, 2022, 11:05 AM

Grecia Figueroa

I hope! I have a thing at 11:30 though :/

Nov 10, 2022, 11:05 AM

Nathan Fletcher

Thank you! Maybe I can say hi before I leave today

Nov 10, 2022, 11:03 AM

Nathan Fletcher

0:00 / 0:00

Nov 10, 2022, 11:03 AM

Grecia Figueroa

Since I may not talk to you tmrw. Happy Veteran's Day :)

Nov 10, 2022, 10:57 AM

Nathan Fletcher

Me too!!!

Nov 10, 2022, 10:55 AM

Nathan Fletcher

Liked a message

Nov 10, 2022, 10:55 AM

Nathan Fletcher

Liked a message

Nov 10, 2022, 10:55 AM

Grecia Figueroa





Grecia Figueroa

Okay :) I look forward to it

❤️ Nathan Fletcher

Nov 10, 2022, 10:48 AM

Nathan Fletcher

Promise!!!

❤️ Grecia Figueroa

Nov 10, 2022, 10:46 AM

Nathan Fletcher

0:00 / 0:00

Nov 10, 2022, 10:46 AM

Grecia Figueroa

Promise?

Nov 10, 2022, 10:46 AM

Nathan Fletcher

Deal!

Nov 10, 2022, 10:44 AM

Grecia Figueroa

Do it. Before classes end

Nov 10, 2022, 10:44 AM

Nathan Fletcher

Yes!!! Hopefully soon. I have to find a day I can get there early!!!!

Nov 10, 2022, 10:42 AM

Grecia Figueroa

Sooo... when do I get to visit prof Fletch? 🙄

Nov 10, 2022, 10:42 AM



Nov 10, 2022, 10:41 AM

Grecia Figueroa

Btw. You are funny... hahaha

😄 Nathan Fletcher

Nov 10, 2022, 10:37 AM

Nathan Fletcher

And thank you—felt good to win big

❤️ Grecia Figueroa

Nov 10, 2022, 10:34 AM

Nathan Fletcher

Sleepy as well:) need a nap

Nov 10, 2022, 10:33 AM

Grecia Figueroa

You?? Congratssss about Tuesday!

Nov 10, 2022, 10:27 AM

Grecia Figueroa

I'm good. Sleepy tbh. 😊

Nov 10, 2022, 10:27 AM

Nathan Fletcher

How are you??

Nov 10, 2022, 10:26 AM

Grecia Figueroa

Good morning :)

Nov 10, 2022, 10:11 AM

Nathan Fletcher

Good morning!

Nov 10, 2022, 10:09 AM



https://instagram.com/stories/grecia_f/2967351705638166947

Nov 9, 2022, 4:35 PM

Grecia Figueroa

Congratulations Superman!! So happy!

Nov 9, 2022, 6:26 AM

Grecia Figueroa

You sent an attachment.

Thank you San Diego!

nathan_fletcher

https://www.instagram.com/reel/Ckus8MygG8d/?id=2967506855431008029_183828023

Nov 9, 2022, 6:26 AM

Grecia Figueroa

I truly loved it, gracias campeón!

Nov 2, 2022, 9:12 PM

Nathan Fletcher



https://instagram.com/stories/grecia_f/2962524927494651533

❤️ Grecia Figueroa

Nov 2, 2022, 7:08 AM

Grecia Figueroa

You shared a story.

https://instagram.com/stories/grecia_f/2962524927494651533

Nov 2, 2022, 1:15 AM

Nathan Fletcher

Liked a message

Oct 22, 2022, 6:12 PM

Grecia Figueroa

Danm 🐶 cutie!! The dog! Not you ;)

❤️ Nathan Fletcher

Oct 22, 2022, 3:16 PM



❤️ Grecia Figueroa

Oct 20, 2022, 9:30 AM

Grecia Figueroa

Cosita rica... leaving after this item. Maybe I'll catch you later.
(Erase msgs!)

Oct 20, 2022, 9:19 AM

Grecia Figueroa

That's so awesome! We are gonna make it through. Watch!

Oct 20, 2022, 8:33 AM

Nathan Fletcher

I did! Had a staff watching party in my office!

Oct 20, 2022, 8:32 AM

Grecia Figueroa

Amazing. Did you watch the game yesterday?

Oct 20, 2022, 8:31 AM

Nathan Fletcher

Liked a message

Oct 20, 2022, 8:29 AM

Nathan Fletcher

👏 I'm good! You?

Oct 20, 2022, 8:29 AM

Grecia Figueroa

Papasito. How are you?

❤️ Nathan Fletcher

Oct 20, 2022, 8:27 AM

Grecia Figueroa

Hi

Oct 20, 2022, 8:24 AM



Oct 20, 2022, 8:23 AM

Grecia Figueroa

I'm dying. This is too amazing !!!!! 🥳🥳 what an amazing day!!!!

Oct 15, 2022, 10:10 PM

Nathan Fletcher

Liked a message

Sep 15, 2022, 5:00 PM

Grecia Figueroa

Nice glasses today! 😊

❤️ Nathan Fletcher

Sep 15, 2022, 4:58 PM

Nathan Fletcher



https://instagram.com/stories/grecia_f/2928127696939375551

❤️ Grecia Figueroa

Sep 15, 2022, 4:22 PM

Nathan Fletcher

Thank you!!! You as well

Sep 12, 2022, 8:00 AM

Nathan Fletcher

Liked a message

Sep 12, 2022, 8:00 AM

Grecia Figueroa

Maybe next time. 😊

Have a great week hun!

❤️ Nathan Fletcher

Sep 12, 2022, 7:53 AM

Nathan Fletcher



Sep 12, 2022, 7:35 AM

Nathan Fletcher

You should have said hello!!!

Sep 12, 2022, 7:35 AM

Grecia Figueroa

I was there today too. thanks for supporting our 9/11 heroes. Great speech. us

Sep 10, 2022, 11:58 PM

Nathan Fletcher

Liked a message

Sep 1, 2022, 10:18 AM

Grecia Figueroa

You too!

❤️ Nathan Fletcher

Sep 1, 2022, 10:15 AM

Nathan Fletcher

Hope you are well

❤️ Grecia Figueroa

Sep 1, 2022, 9:35 AM

Nathan Fletcher

Hi there

Sep 1, 2022, 8:48 AM

Grecia Figueroa

Have a good nigh! 😊

Aug 4, 2022, 6:35 PM

Nathan Fletcher

Liked a message

Aug 4, 2022, 6:34 PM



♥ Nathan Fletcher

Aug 4, 2022, 6:34 PM

Nathan Fletcher

Have to run. Catch up soon!!!!

Aug 4, 2022, 6:34 PM

Nathan Fletcher

I am:(

😬 Grecia Figueroa

Aug 4, 2022, 6:29 PM

Grecia Figueroa

Are you fully back at work now?

Aug 4, 2022, 6:04 PM

Nathan Fletcher

He makes me laugh

Aug 4, 2022, 6:04 PM

Grecia Figueroa

That's adorable

Aug 4, 2022, 6:03 PM

Grecia Figueroa



Aug 4, 2022, 6:03 PM

Grecia Figueroa

Deff takes after the father then !!'

Aug 4, 2022, 6:03 PM

Grecia Figueroa

Hahahahahaha and he's smart too.

Aug 4, 2022, 6:03 PM



It was 530am but he was ready for a walk

Aug 4, 2022, 6:03 PM

Grecia Figueroa

Dogs are just the best

Aug 4, 2022, 6:02 PM

Grecia Figueroa

How sweet!!!!

Aug 4, 2022, 6:02 PM

Nathan Fletcher

Should have worn my glasses today:)

😊 Grecia Figueroa

Aug 4, 2022, 6:02 PM

Nathan Fletcher

Going home now—he is the happiest he has ever been in his life everytime I come home:)

Aug 4, 2022, 6:01 PM

Grecia Figueroa

I almost forgot what you looked like in person ...

Aug 4, 2022, 6:01 PM

Nathan Fletcher

Liked a message

Aug 4, 2022, 6:01 PM

Grecia Figueroa

Takes after the dad

❤️ Nathan Fletcher

Aug 4, 2022, 6:01 PM

Grecia Figueroa

He is a cutie

Aug 4, 2022, 6:01 PM



Aug 4, 2022, 6:01 PM

Grecia Figueroa

I know you told me

Aug 4, 2022, 6:01 PM

Nathan Fletcher

I'm good. Got a dog!!!!!!

Aug 4, 2022, 6:01 PM

Grecia Figueroa

I'm good...busy as well. How are you?

Aug 4, 2022, 6:00 PM

Nathan Fletcher

Problem with trying to take any time off

Aug 4, 2022, 6:00 PM

Nathan Fletcher

It's been crazy busy schedule

Aug 4, 2022, 6:00 PM

Grecia Figueroa

Nice to see you too! Quickly

Aug 4, 2022, 6:00 PM

Nathan Fletcher

How are you?

Aug 4, 2022, 6:00 PM

Nathan Fletcher

Reacted 😄 to your message

Aug 4, 2022, 5:59 PM

Grecia Figueroa



Nathan Fletcher

Was nice to see you very briefly today

Aug 4, 2022, 5:58 PM

Nathan Fletcher

Liked a message

Jul 19, 2022, 11:59 AM

Nathan Fletcher

Boys named him. They think hillrioua to tell people he is "nacho dog" he is "our dog"

😂 Grecia Figueroa

Jul 19, 2022, 11:59 AM

Grecia Figueroa

okay hun. I'll let you go.... see you soon... and have a lot of fun on your trips :)

❤️ Nathan Fletcher

Jul 19, 2022, 11:59 AM

Grecia Figueroa

hahaha.. cute!!cute name

Jul 19, 2022, 11:59 AM

Nathan Fletcher

Nacho

Jul 19, 2022, 11:59 AM

Grecia Figueroa

awww ...whats the name?

Jul 19, 2022, 11:59 AM

Nathan Fletcher

He is the best!!!

Jul 19, 2022, 11:58 AM

Grecia Figueroa



Grecia Figueroa

you got a dog!!!COngrats! ...

Jul 19, 2022, 11:58 AM

Grecia Figueroa

oh that's right!!!

Jul 19, 2022, 11:58 AM

Nathan Fletcher

But I love those kids and my new dog!!!

Jul 19, 2022, 11:58 AM

Nathan Fletcher

I often am:(

Jul 19, 2022, 11:57 AM

Nathan Fletcher

I have to run but wanted to say hi! I'll be back in a few weeks!

Jul 19, 2022, 11:57 AM

Grecia Figueroa

ahhh don't be hard on yourself

Jul 19, 2022, 11:57 AM

Nathan Fletcher

Trying to be a good dad. Lot of flaws in me but try hard to do right for them

Jul 19, 2022, 11:56 AM

Grecia Figueroa

awww it's like camping every day...once they go to college that's so much harder to do

Jul 19, 2022, 11:56 AM

Nathan Fletcher

Older kids come up as well

**Nathan Fletcher**

They love it. Swim in lake, hike trails, cook s'mores at night, etc

Jul 19, 2022, 11:55 AM

Nathan Fletcher

Depends, but definitely try and get boys to the mountains for some focused time

Jul 19, 2022, 11:55 AM

Grecia Figueroa

it's nice taking a break like that every once in a while =)

Jul 19, 2022, 11:54 AM

Grecia Figueroa

that's great... is that what you usually do during the summer?

Jul 19, 2022, 11:54 AM

Nathan Fletcher

Then back to regular grind start of august, little work each day. Todya was like a real day going to the office but generally avoiding stuff beyond the essential

Jul 19, 2022, 11:53 AM

Grecia Figueroa

Oh by "I heard" .. i mean your staff told us when we requested you for the Comic Con news conference.. lol

Jul 19, 2022, 11:53 AM

Grecia Figueroa

nicee.....

Jul 19, 2022, 11:52 AM

Nathan Fletcher

Nah. I'm still working, but was up in Big Bear. Back for a bit. Going back up there again then back here and the Bay Area

❤️ Grecia Figueroa

Jul 19, 2022, 11:52 AM

Grecia Figueroa

i heard you were Unavailabbeeee all month.. haha



Grecia Figueroa

that's great.. where did you go?

Jul 19, 2022, 11:50 AM

Nathan Fletcher

Liked a message

Jul 19, 2022, 11:50 AM

Grecia Figueroa

little to you forever...

❤️ Nathan Fletcher

Jul 19, 2022, 11:50 AM

Grecia Figueroa

ooohhh that IS fun. weather has been lovely over here too...

Jul 19, 2022, 11:50 AM

Nathan Fletcher

And a lot of time with the "little boys". 11 and 14. Only a few summers of adventure left with them

😄 Grecia Figueroa

Jul 19, 2022, 11:50 AM

Nathan Fletcher

Snuck in some mountain biking and a little scuba diving!!!

Jul 19, 2022, 11:49 AM

Grecia Figueroa

tell me you've been doing fun stuff!

Jul 19, 2022, 11:49 AM

Grecia Figueroa

awww that's awesome!

Jul 19, 2022, 11:49 AM

Nathan Fletcher

It's been nice



Nathan Fletcher

Sorry—fat thumbs sending audio:) I'm good, been out of town with kids, etc. some work in between.

Jul 19, 2022, 11:48 AM

Nathan Fletcher

0:00 / 0:00

Jul 19, 2022, 11:47 AM

Nathan Fletcher

0:00 / 0:00

Jul 19, 2022, 10:54 AM

Grecia Figueroa

Hi there. Just good summer overall. Nothing crazy. How about you?

Jul 19, 2022, 9:19 AM

Nathan Fletcher

How are you? Fun summer?

Jul 19, 2022, 8:05 AM

Nathan Fletcher

Liked a message

Jul 1, 2022, 7:48 PM

Grecia Figueroa

Have a great 4th! us

❤️ Nathan Fletcher

Jul 1, 2022, 11:38 AM

Nathan Fletcher

Liked a message

Jun 17, 2022, 9:48 AM



❤️ Nathan Fletcher

Jun 17, 2022, 9:43 AM

Nathan Fletcher



❤️ Grecia Figueroa

Jun 17, 2022, 9:34 AM

Grecia Figueroa

talk to you soon! :)

Jun 16, 2022, 11:08 AM

Nathan Fletcher

Talk later!

Jun 16, 2022, 11:07 AM

Nathan Fletcher

I'll do better!

❤️ Grecia Figueroa

Jun 16, 2022, 10:54 AM

Grecia Figueroa

I'm listening ...

Jun 16, 2022, 10:11 AM

Grecia Figueroa

Okay

Jun 16, 2022, 10:10 AM

Grecia Figueroa

Okay did you bring me anything from Philly 🤔?

Jun 16, 2022, 10:10 AM

Nathan Fletcher

Reacted 🤔 to your message

Jun 16, 2022, 10:10 AM



😬 Nathan Fletcher

Jun 16, 2022, 10:10 AM

Grecia Figueroa

Nahhh nahh.. there's internet service in Philly

Jun 16, 2022, 10:10 AM

Nathan Fletcher

Maybe I can make it up to you

Jun 16, 2022, 10:09 AM

Nathan Fletcher

I know. Did think about it. Was travling with family but apologize.

Jun 16, 2022, 10:09 AM

Grecia Figueroa

Terrible

Jun 16, 2022, 10:09 AM

Grecia Figueroa

You didn't wish me a happy birthday

Jun 16, 2022, 10:09 AM

Nathan Fletcher

I have some things I could demonstrate

😬 Grecia Figueroa

Jun 16, 2022, 10:08 AM

Nathan Fletcher

Por

Jun 16, 2022, 10:08 AM

Nathan Fletcher

Pot que?

Jun 16, 2022, 10:08 AM



Jun 16, 2022, 10:07 AM

Grecia Figueroa

Haha yes

Jun 16, 2022, 10:07 AM

Nathan Fletcher

Yes?

Jun 16, 2022, 10:04 AM

Grecia Figueroa

Uhhmm You can demonstrate anythinggggg for me.

Jun 16, 2022, 9:54 AM

Nathan Fletcher

I'll demonstrate for you

Jun 16, 2022, 9:39 AM

Grecia Figueroa

Okay there's no way you can read the yellow font 😞

Jun 16, 2022, 9:15 AM

Nathan Fletcher

Reacted 😄 to your message

Jun 16, 2022, 9:09 AM

Grecia Figueroa

It's my old age 🙄👵

😄 Nathan Fletcher

Jun 16, 2022, 9:09 AM

Nathan Fletcher

I can read just fine:)

Jun 16, 2022, 9:08 AM



Jun 16, 2022, 9:08 AM

Grecia Figueroa

Do you seeeee how tiny Denis fonts are? 🤪

Jun 16, 2022, 9:08 AM

Grecia Figueroa

It's a whole new world.

Jun 16, 2022, 9:08 AM

Nathan Fletcher

Now you can see:)

Jun 16, 2022, 9:06 AM

Nathan Fletcher

Reacted 😄 to your message

Jun 16, 2022, 8:44 AM

Grecia Figueroa

I can't read the slides I need mine too 🙄

😄 Nathan Fletcher

Jun 16, 2022, 8:44 AM

Nathan Fletcher

Soon

Jun 16, 2022, 8:44 AM

Nathan Fletcher

Saving them:) but coming son

Jun 16, 2022, 8:44 AM

Nathan Fletcher

Liked a message

Jun 16, 2022, 8:43 AM



❤️ Nathan Fletcher

Jun 16, 2022, 8:43 AM

Nathan Fletcher

How are you?

Jun 16, 2022, 8:39 AM

Nathan Fletcher

Liked a message

Jun 9, 2022, 9:50 AM

Grecia Figueroa

And My bday is tmrw. So it's already a good one! ;)

❤️ Nathan Fletcher

Jun 9, 2022, 9:50 AM

Nathan Fletcher

Liked a message

Jun 9, 2022, 9:48 AM

Grecia Figueroa

Nice to see you too!! 🥰

❤️ Nathan Fletcher

Jun 9, 2022, 9:47 AM

Nathan Fletcher

Talk next week

❤️ Grecia Figueroa

Jun 9, 2022, 9:47 AM

Nathan Fletcher

Nice to see you!!!!

Jun 9, 2022, 9:46 AM

Nathan Fletcher

Where you?



Nathan Fletcher

I'm in comfercne room

Jun 9, 2022, 9:43 AM

Grecia Figueroa

I don't see you

Jun 9, 2022, 9:43 AM

Nathan Fletcher

Yup

Jun 9, 2022, 9:41 AM

Grecia Figueroa

Is everyone gone?

Jun 9, 2022, 9:40 AM

Nathan Fletcher

I have five minutes

Jun 9, 2022, 9:39 AM

Grecia Figueroa

If you go in the room on the side.. I'll come by once everyone leaves the board room

Jun 9, 2022, 9:31 AM

Grecia Figueroa

Yes that's true

Jun 9, 2022, 9:23 AM

Nathan Fletcher

Philadelphia

Jun 9, 2022, 9:23 AM

Nathan Fletcher

But we could be done by 1030 today. Last item

Jun 9, 2022, 9:23 AM



Jun 9, 2022, 9:23 AM

Grecia Figueroa

Yes! Try!

Jun 9, 2022, 9:22 AM

Nathan Fletcher

But next meeting I can try and stay longer

Jun 9, 2022, 9:22 AM

Nathan Fletcher

I have to leave around 1045. Have a plane to catch

Jun 9, 2022, 9:22 AM

Grecia Figueroa

Are you staying after the meeting or leaving right away?

Jun 9, 2022, 9:21 AM

Grecia Figueroa

Maybe...

Jun 9, 2022, 9:21 AM

Nathan Fletcher

Is there a stair well here? :)

Jun 9, 2022, 9:19 AM

Nathan Fletcher

Almost wore my glasses

❤️ Grecia Figueroa

Jun 9, 2022, 9:19 AM

Nathan Fletcher

Liked a message

Jun 9, 2022, 9:19 AM



♥ Nathan Fletcher

Jun 9, 2022, 9:17 AM

Grecia Figueroa

Hey

Jun 9, 2022, 9:17 AM

Nathan Fletcher

Hi

Jun 9, 2022, 9:16 AM

Grecia Figueroa



Jun 7, 2022, 8:46 PM

Nathan Fletcher

Liked a message

Jun 3, 2022, 2:40 PM

Nathan Fletcher

🔥 🔥 fire

Jun 3, 2022, 2:40 PM

Nathan Fletcher

Deal!!!

Jun 3, 2022, 2:40 PM

Grecia Figueroa

have an amazing rest of your day!!! muah!

Jun 3, 2022, 2:40 PM

Grecia Figueroa

okay, you find it...and let me know ;)

♥ Nathan Fletcher

Jun 3, 2022, 2:39 PM



Jun 3, 2022, 2:39 PM

Grecia Figueroa

Lol

Jun 3, 2022, 2:39 PM

Grecia Figueroa

Ugh that sucks!

Jun 3, 2022, 2:39 PM

Grecia Figueroa

Me tooo

Jun 3, 2022, 2:38 PM

Nathan Fletcher

I'll miss our spot!

Jun 3, 2022, 2:38 PM

Nathan Fletcher

But sadly no stairwell bar

👉 Grecia Figueroa

Jun 3, 2022, 2:37 PM

Nathan Fletcher

Back home!

Jun 3, 2022, 2:37 PM

Grecia Figueroa

hopefully. how much longer will you be at the hotel?

Jun 3, 2022, 2:33 PM

Nathan Fletcher

It will happen!!!

Jun 3, 2022, 2:33 PM



Jun 3, 2022, 2:32 PM

Nathan Fletcher

But someday stars will align!

❤️ Grecia Figueroa

Jun 3, 2022, 2:32 PM

Nathan Fletcher

Just tough with schedule, security guys, etc

Jun 3, 2022, 2:32 PM

Nathan Fletcher

Hope to see you again soon

Jun 3, 2022, 2:32 PM

Grecia Figueroa

haha. okay I won't....

Jun 3, 2022, 2:29 PM

Nathan Fletcher

Don't apologize!

❤️ Grecia Figueroa

Jun 3, 2022, 2:29 PM

Nathan Fletcher

Liked a message

Jun 3, 2022, 2:28 PM

Grecia Figueroa

jajaj

Jun 3, 2022, 2:28 PM

Grecia Figueroa

sorry..

Jun 3, 2022, 2:28 PM



❤️ Nathan Fletcher

Jun 3, 2022, 2:28 PM

Nathan Fletcher

Feels like full beard at 3pm:)

Jun 3, 2022, 2:28 PM

Grecia Figueroa

you must be super busy

Jun 3, 2022, 2:28 PM

Grecia Figueroa

jajaaj.. did the 5 o'clock shadow become 2 o'clock?

Jun 3, 2022, 2:28 PM

Nathan Fletcher

Have to go home before evening stuff to shave again:)

Jun 3, 2022, 2:27 PM

Nathan Fletcher

Got up at 430

Jun 3, 2022, 2:27 PM

Nathan Fletcher

Reacted 😊 to your message

Jun 3, 2022, 2:27 PM

Grecia Figueroa

Final stretch!! 🙌🙌 you are doing great!!!

😊 Nathan Fletcher

Jun 3, 2022, 2:25 PM

Grecia Figueroa

What time did you wake up?

Jun 3, 2022, 2:25 PM



Jun 3, 2022, 2:23 PM

Nathan Fletcher

Me too!

Jun 3, 2022, 2:22 PM

Grecia Figueroa

I'm ready for the weekend. :) how are you?

Jun 3, 2022, 2:20 PM

Nathan Fletcher

How are you?

Jun 3, 2022, 2:16 PM

Nathan Fletcher



https://instagram.com/stories/grecia_f/2852128020344741199

Jun 3, 2022, 1:48 PM

Grecia Figueroa

I hope so too!

May 26, 2022, 11:44 AM

Nathan Fletcher

Hope to see you again soon

❤️Grecia Figueroa

May 26, 2022, 11:43 AM

Nathan Fletcher

Reacted 😄 to your message

May 26, 2022, 11:43 AM

Grecia Figueroa

you made me laugh soooo much when you said Caleb was my height ... jajajaja

😄Nathan Fletcher

May 26, 2022, 11:38 AM



May 26, 2022, 11:37 AM

Nathan Fletcher

So nice to see you

May 26, 2022, 11:35 AM

Nathan Fletcher

Talk then!!

❤️ Grecia Figueroa

May 25, 2022, 2:38 PM

Grecia Figueroa

hehe okay :)

May 25, 2022, 2:38 PM

Nathan Fletcher

I won't:)

May 25, 2022, 2:38 PM

Grecia Figueroa

don't be late!!!! lol

May 25, 2022, 2:38 PM

Nathan Fletcher

Liked a message

May 25, 2022, 2:38 PM

Grecia Figueroa

yes, I'll see you tmrw :)

❤️ Nathan Fletcher

May 25, 2022, 2:38 PM

Nathan Fletcher

So I'll see you tomorrow!!!!

May 25, 2022, 2:37 PM



May 25, 2022, 2:35 PM

Nathan Fletcher

Took my kids to school this morning and didn't want to drop them off
May 25, 2022, 2:30 PM

Nathan Fletcher

It is heartbreaking
May 25, 2022, 2:29 PM

Grecia Figueroa

how are you holding up?
May 25, 2022, 2:24 PM

Grecia Figueroa

we added a moment of silence for the presser tmrw.
May 25, 2022, 2:24 PM

Grecia Figueroa

hi there! it's been crazy these past two days with everything
May 25, 2022, 2:23 PM

Nathan Fletcher

How are you?
May 25, 2022, 2:16 PM

Nathan Fletcher

We will see how we do:)
May 16, 2022, 8:54 PM

Grecia Figueroa

I will practice "I'm totally not thinking about kissing his face right now"
May 16, 2022, 8:45 PM

Nathan Fletcher



Nathan Fletcher

Reacted 👍 to your message

May 16, 2022, 8:43 PM

Grecia Figueroa

Oh and we have a news conference next Thursday FYI

👍 Nathan Fletcher

May 16, 2022, 8:42 PM

Nathan Fletcher

Sweet dreams

May 16, 2022, 8:42 PM

Grecia Figueroa

Well Im gonna get some work out in before calling it a night. Sleep well... 🚫

May 16, 2022, 8:42 PM

Nathan Fletcher

But an opportunity will arise. And we can be secretly impulsive:)

❤️ Grecia Figueroa

May 16, 2022, 8:40 PM

Grecia Figueroa

Jk lol

May 16, 2022, 8:40 PM

Grecia Figueroa

Next year!!!

May 16, 2022, 8:40 PM

Nathan Fletcher

Not sure

May 16, 2022, 8:40 PM

Grecia Figueroa



Nathan Fletcher

Maybe one day time that isn't so rushed!

May 16, 2022, 8:34 PM

Nathan Fletcher

Was very nice. Little rushed and frantic

May 16, 2022, 8:31 PM

Nathan Fletcher

I'm missing yours as well

May 16, 2022, 8:30 PM

Nathan Fletcher

Liked a message

May 16, 2022, 8:30 PM

Grecia Figueroa

Missing your lips

❤️ Nathan Fletcher

May 16, 2022, 8:20 PM

Nathan Fletcher

Please:)

May 16, 2022, 8:19 PM

Nathan Fletcher

Do it!!!!!!

May 16, 2022, 8:19 PM

Grecia Figueroa

I was actually gonna reply something inappropriate but I'll tell you another day 🤪

May 16, 2022, 8:02 PM

Grecia Figueroa



Nathan Fletcher

Not too bad!!! Was in sacramento and just flew home for class tonight!

May 16, 2022, 7:55 PM

Grecia Figueroa

Hi! Good 😊 how was your day?

May 16, 2022, 7:41 PM

Nathan Fletcher

How are you?

May 16, 2022, 7:31 PM

Nathan Fletcher

Have a great day!

May 13, 2022, 7:24 AM

Nathan Fletcher

And I trust you as well

May 13, 2022, 7:24 AM

Nathan Fletcher

Must be so cautious!!!

May 13, 2022, 7:24 AM

Grecia Figueroa

I'm good, and be cautious please, I trust you. Talk to you soon! Have a great weekend!

May 13, 2022, 7:24 AM

Nathan Fletcher

I'll check in next week!

May 13, 2022, 7:23 AM

Grecia Figueroa

We were. And I enjoyed it too.



Nathan Fletcher

I have to run but wanted to make sure you are ok:)

May 13, 2022, 7:22 AM

Nathan Fletcher

I enjoyed your company. Yes we were impulsive and a little reckless but was nice escape for a bit

May 13, 2022, 7:22 AM

Nathan Fletcher

Me too:)

May 13, 2022, 7:21 AM

Grecia Figueroa

I'm sleepy lol

May 13, 2022, 7:19 AM

Grecia Figueroa

Morning!! Rise and shine!! ✨ ✨

May 13, 2022, 7:18 AM

Nathan Fletcher

Good morning!

May 13, 2022, 6:29 AM

Nathan Fletcher

Night

May 13, 2022, 1:06 AM

Nathan Fletcher

I'll check in with you next week

❤️ Grecia Figueroa

May 13, 2022, 1:06 AM

Grecia Figueroa

Night night!



Nathan Fletcher

Yea. Those dreams!

May 13, 2022, 1:06 AM

Nathan Fletcher

Liked a message

May 13, 2022, 1:06 AM

Grecia Figueroa

Sweeeeet dreamsssss

❤️ Nathan Fletcher

May 13, 2022, 1:06 AM

Nathan Fletcher

Thank you for coming to see me!

❤️ Grecia Figueroa

May 13, 2022, 1:06 AM

Grecia Figueroa

What a night!

May 13, 2022, 1:06 AM

Nathan Fletcher

Ok! Goodnight

May 13, 2022, 1:06 AM

Grecia Figueroa

I'm home

May 13, 2022, 1:05 AM

Nathan Fletcher

Make it home ok?

May 13, 2022, 1:02 AM

Nathan Fletcher

As amazing as I dreamt

❤️ Grecia Figueroa



Nathan Fletcher

Go left

May 12, 2022, 9:48 PM

Grecia Figueroa

??

May 12, 2022, 9:48 PM

Grecia Figueroa

What do I do once in there

May 12, 2022, 9:48 PM

Nathan Fletcher

Come into hotel lobby

May 12, 2022, 9:48 PM

Grecia Figueroa

Okay I saw you

May 12, 2022, 9:48 PM

Grecia Figueroa

I don't see you

May 12, 2022, 9:47 PM

Nathan Fletcher

Reacted 😊 to your message

May 12, 2022, 9:47 PM

Grecia Figueroa

I feel like such a fugitive lol

😊 Nathan Fletcher

May 12, 2022, 9:47 PM

Grecia Figueroa

I see you



Nathan Fletcher

Grey hoodie

May 12, 2022, 9:46 PM

Nathan Fletcher

Follow me

May 12, 2022, 9:46 PM

Grecia Figueroa

Where ???

May 12, 2022, 9:46 PM

Grecia Figueroa

Lol

May 12, 2022, 9:45 PM

Nathan Fletcher

I see you

May 12, 2022, 9:45 PM

Nathan Fletcher

Come down Broadway

May 12, 2022, 9:44 PM

Grecia Figueroa



May 12, 2022, 9:43 PM

Nathan Fletcher

Which way?

May 12, 2022, 9:43 PM

Grecia Figueroa

I'm like a 5 min walk away

May 12, 2022, 9:43 PM



May 12, 2022, 9:42 PM

Grecia Figueroa

Okay tell me what I have to do

May 12, 2022, 9:42 PM

Nathan Fletcher

I can come meet you outside but we have to come in separate. All the staff here know me.

May 12, 2022, 9:39 PM

Grecia Figueroa

I'll let you know when I park but I have to walk like a block or so

May 12, 2022, 9:39 PM

Grecia Figueroa

I'm almost at my friends

May 12, 2022, 9:38 PM

Nathan Fletcher

Come see me!

May 12, 2022, 9:36 PM

Grecia Figueroa

So discreet

May 12, 2022, 9:35 PM

Nathan Fletcher

It's the hot place

May 12, 2022, 9:35 PM

Grecia Figueroa

Hahaha

May 12, 2022, 9:35 PM

Nathan Fletcher



Nathan Fletcher

Reacted 😄 to your message

May 12, 2022, 9:34 PM

Grecia Figueroa

I'm parking down the street at my friends ...I said I'm going to a bar lol

😄 Nathan Fletcher

May 12, 2022, 9:34 PM

Nathan Fletcher

And I'm wearing a dirty hoodie and workout shorts!

May 12, 2022, 9:29 PM

Grecia Figueroa

So classy San Diego

May 12, 2022, 9:28 PM

Nathan Fletcher

Pure class:(

😄 Grecia Figueroa

May 12, 2022, 9:27 PM

Grecia Figueroa

I mean.. it is a stairwell

May 12, 2022, 9:27 PM

Nathan Fletcher

Let me know when pulling in and I'll head down elevator

May 12, 2022, 9:27 PM

Grecia Figueroa

Okay... haha that's fine.

May 12, 2022, 9:27 PM

Nathan Fletcher



Nathan Fletcher

Have beer:)

May 12, 2022, 9:25 PM

Nathan Fletcher

Yay!

May 12, 2022, 9:24 PM

Grecia Figueroa

Leaving my place now

May 12, 2022, 9:23 PM

Nathan Fletcher

Liked a message

May 12, 2022, 8:36 PM

Grecia Figueroa

See you soon

❤️ Nathan Fletcher

May 12, 2022, 8:36 PM

Grecia Figueroa

K

May 12, 2022, 8:36 PM

Nathan Fletcher

Perfect

May 12, 2022, 8:36 PM

Grecia Figueroa

10:30 ?

May 12, 2022, 8:36 PM

Nathan Fletcher

We can have a beer in the stairwell on 16th floor:)



Nathan Fletcher

Let's say 10:15. When you come into lobby head to your left to elevators. I'll take one down right about then as need a key to come up!

May 12, 2022, 8:35 PM

Grecia Figueroa

Okay. Got it.

May 12, 2022, 8:34 PM

Nathan Fletcher

It's the residence inn. Bayfront Marriott. Across from intercontinental 900 Bayfront court

May 12, 2022, 8:34 PM

Nathan Fletcher

Reacted 😊 to your message

May 12, 2022, 8:32 PM

Grecia Figueroa

*With beers lol

😊 Nathan Fletcher

May 12, 2022, 8:32 PM

Grecia Figueroa

I'm not too picky

May 12, 2022, 8:32 PM

Grecia Figueroa

Uhhmm... light color ones

May 12, 2022, 8:32 PM

Nathan Fletcher

What kind of beer do you like?

May 12, 2022, 8:31 PM

Nathan Fletcher

Deal! But not until after 10!



Grecia Figueroa

Haha

May 12, 2022, 8:31 PM

Nathan Fletcher

That's it? :)

May 12, 2022, 8:31 PM

Grecia Figueroa

Just one beer

May 12, 2022, 8:30 PM

Grecia Figueroa

True

May 12, 2022, 8:30 PM

Nathan Fletcher

I'm feeling a bit impulsive

May 12, 2022, 8:30 PM

Grecia Figueroa



May 12, 2022, 8:30 PM

Nathan Fletcher

I'm on 16th floor. Not many people take the stairs

😂 Grecia Figueroa

May 12, 2022, 8:30 PM

Grecia Figueroa

Are you feeling impulsive??

May 12, 2022, 8:30 PM

Nathan Fletcher

Haha. Yes:)



Grecia Figueroa

So it's the actual stairs!

May 12, 2022, 8:30 PM

Nathan Fletcher

But super last minute so no pressure

May 12, 2022, 8:30 PM

Grecia Figueroa

Hahahaha

May 12, 2022, 8:29 PM

Nathan Fletcher

As long as no fire drill the most private place here

May 12, 2022, 8:29 PM

Nathan Fletcher

The stairwell. The stairs:)

May 12, 2022, 8:29 PM

Grecia Figueroa

What!? In a where ?

May 12, 2022, 8:29 PM

Nathan Fletcher

If you are feeling impulsive we could sit in stairwell after 10pm and have a beer:)

May 12, 2022, 8:28 PM

Grecia Figueroa

Read is good

May 12, 2022, 8:28 PM

Nathan Fletcher

Bar is open but all the bartenders know me

May 12, 2022, 8:28 PM



May 12, 2022, 8:28 PM

Grecia Figueroa

So what do you usually do on nights like these?

May 12, 2022, 8:26 PM

Nathan Fletcher

I try:)

May 12, 2022, 8:25 PM

Grecia Figueroa

(You are such a good father btw!) truly mean that

May 12, 2022, 8:25 PM

Grecia Figueroa

Awwwwwww

May 12, 2022, 8:24 PM

Nathan Fletcher

Just got the boys down. Just me and them tonight!

❤️ Grecia Figueroa

May 12, 2022, 8:24 PM

Grecia Figueroa

Its 9:30

May 12, 2022, 8:24 PM

Grecia Figueroa

Hi! Haha yes.

May 12, 2022, 8:24 PM

Nathan Fletcher

Still up?

May 12, 2022, 8:21 PM



May 12, 2022, 6:56 PM

Nathan Fletcher

I have to run. Might be able to chat later and will look for a time we can get together!!!

❤️ Grecia Figueroa

May 12, 2022, 6:56 PM

Grecia Figueroa



May 12, 2022, 6:55 PM

Nathan Fletcher

And thank you!!!!

May 12, 2022, 6:55 PM

Nathan Fletcher

I do:)

May 12, 2022, 6:55 PM

Grecia Figueroa

Plz make sure you delete that Audio lololol

May 12, 2022, 6:54 PM

Grecia Figueroa

0:00 / 0:00

May 12, 2022, 6:54 PM

Nathan Fletcher

You can send me an audio

May 12, 2022, 6:52 PM

Nathan Fletcher

Sweet!



Grecia Figueroa

Are you alone rn? Can I send you an audio? For pronunciation purposes

May 12, 2022, 6:52 PM

Grecia Figueroa

"Papasito"

May 12, 2022, 6:52 PM

Nathan Fletcher

Reacted 👍 to your message

May 12, 2022, 6:51 PM

Grecia Figueroa

You'd have to look it up

👍 Nathan Fletcher

May 12, 2022, 6:51 PM

Nathan Fletcher

Ok!

May 12, 2022, 6:51 PM

Grecia Figueroa

But I can't tell you what it means

May 12, 2022, 6:51 PM

Grecia Figueroa

I'm gonna teach you a word in Spanish... since you mentioned you don't know too much Spanish

May 12, 2022, 6:50 PM

Nathan Fletcher

Try!

May 12, 2022, 6:50 PM

Grecia Figueroa

Okay... let me see. But this is actually fun



Nathan Fletcher

You could not say anything that would make me uncomfortable!!!!

May 12, 2022, 6:50 PM

Nathan Fletcher

But only if you are completely comfortable. No pressure at all

May 12, 2022, 6:49 PM

Grecia Figueroa

Also, if I ever say anything inappropriate or make you feel uncomfortable, promise to tell me?

May 12, 2022, 6:49 PM

Grecia Figueroa

Ok

May 12, 2022, 6:49 PM

Nathan Fletcher

I hope so

May 12, 2022, 6:48 PM

Grecia Figueroa

Do you think it will happen though?

May 12, 2022, 6:48 PM

Grecia Figueroa

Ok cool.

May 12, 2022, 6:48 PM

Nathan Fletcher

I delete as we go

May 12, 2022, 6:48 PM

Grecia Figueroa

Bc I worry that your staff would see something

May 12, 2022, 6:47 PM



May 12, 2022, 6:47 PM

Nathan Fletcher

Deal! I look forward to it

May 12, 2022, 6:47 PM

Grecia Figueroa

Yess.. so you find a day and time that works

May 12, 2022, 6:47 PM

Nathan Fletcher

And please make sure you delete our chats!

May 12, 2022, 6:47 PM

Nathan Fletcher

But yes. Risky for us both

May 12, 2022, 6:47 PM

Nathan Fletcher

Or if I sneak out and don't tell them

😬 Grecia Figueroa

May 12, 2022, 6:46 PM

Grecia Figueroa

Ohhh okay. Cool.

May 12, 2022, 6:46 PM

Nathan Fletcher

Generally but not when I'm in my room here.

May 12, 2022, 6:46 PM

Grecia Figueroa

Are your security guards allways with you?

May 12, 2022, 6:45 PM



May 12, 2022, 6:45 PM

Grecia Figueroa

Yeah

May 12, 2022, 6:45 PM

Nathan Fletcher

If you are ok with that.

May 12, 2022, 6:45 PM

Grecia Figueroa

Okay.. yeah that sounds good

May 12, 2022, 6:45 PM

Nathan Fletcher

Would have to be careful. And 100% discreet

May 12, 2022, 6:44 PM

Grecia Figueroa

I trust you

May 12, 2022, 6:44 PM

Grecia Figueroa

And I'll follow your lead

May 12, 2022, 6:44 PM

Grecia Figueroa

I'll leave it to you... you find a day and time

May 12, 2022, 6:43 PM

Grecia Figueroa

I'd like that... but is it risky though?

May 12, 2022, 6:43 PM

Nathan Fletcher



Grecia Figueroa

But you are so close. I'm sure you are happy to go back though

May 12, 2022, 6:43 PM

Grecia Figueroa

I mean yesss yay for you

May 12, 2022, 6:42 PM

Nathan Fletcher

I know:(

May 12, 2022, 6:42 PM

Grecia Figueroa

Noooooo :(

May 12, 2022, 6:42 PM

Nathan Fletcher

I'll only be your neighbor for about two more weeks. Then back home.

May 12, 2022, 6:42 PM

Nathan Fletcher

Science:) turns out that was bad for us!

May 12, 2022, 6:42 PM

Grecia Figueroa

I was like what?! Where were those schedules when I was waking up at 6 am 😊

May 12, 2022, 6:41 PM

Grecia Figueroa

Btw. Talking about high school. Crazy they start at 10 am now...

May 12, 2022, 6:41 PM

Grecia Figueroa

That's impressive. That's tough waking up that early too



Nathan Fletcher

Was a janitor in a movie theater. Did that job at 4am every morning before school in high school

❤️ Grecia Figueroa

May 12, 2022, 6:40 PM

Nathan Fletcher

I did. Drove forklifts in lumber yards, carried cinder blocks up scaffolding

❤️ Grecia Figueroa

May 12, 2022, 6:39 PM

Grecia Figueroa

Awww 😊 thank you

May 12, 2022, 6:39 PM

Nathan Fletcher

Not all of us have the natural Peruvian beauty

May 12, 2022, 6:39 PM

Grecia Figueroa

You worked construction too!? You are a box full of surprises

May 12, 2022, 6:39 PM

Nathan Fletcher

Liked a message

May 12, 2022, 6:38 PM

Nathan Fletcher

When I worked construction in college I got so dark! Of course we didn't wear sunscreen or anything

May 12, 2022, 6:38 PM

Nathan Fletcher

Got some sun this weekend!!!

May 12, 2022, 6:38 PM

Grecia Figueroa

Suits you well 😊



Grecia Figueroa

You looked good... you got a tan going on

♥ Nathan Fletcher

May 12, 2022, 6:38 PM

Nathan Fletcher

I was hoping to run into you.

May 12, 2022, 6:37 PM

Nathan Fletcher

Liked a message

May 12, 2022, 6:36 PM

Grecia Figueroa

Btw. It was nice seeing you today.

♥ Nathan Fletcher

May 12, 2022, 6:35 PM

Grecia Figueroa

I like to inform ppl through social... I love election years. I'm such a nerd

May 12, 2022, 6:35 PM

Grecia Figueroa

It's okay, im telling my friends though...

May 12, 2022, 6:34 PM

Grecia Figueroa

Hahahahaha

May 12, 2022, 6:33 PM

Nathan Fletcher

If you were really committed you would move:)

May 12, 2022, 6:33 PM

Grecia Figueroa

If I could vote for you! I would. Danm those new district zones! Lol



Nathan Fletcher

And who are you voting for???? :)

May 12, 2022, 6:30 PM

Nathan Fletcher



https://instagram.com/stories/grecia_f/2836930870905149068

❤️ Grecia Figueroa

May 12, 2022, 6:24 PM

Nathan Fletcher

Reacted 🤔 to your message

May 12, 2022, 12:36 PM

Grecia Figueroa

It caught me off guard running into you by the elevators... I was going to pick up my mail!

😁 Nathan Fletcher

May 12, 2022, 12:35 PM

Grecia Figueroa

Such a busy day!

May 12, 2022, 12:34 PM

Nathan Fletcher

Sorry I missed you this morning

May 12, 2022, 12:33 PM

Nathan Fletcher

Haha!

May 12, 2022, 7:37 AM

Grecia Figueroa

Well I'll see you soon then. If I keep txting I'll be late 😁

May 12, 2022, 7:35 AM

Nathan Fletcher

Heading to MTS:)



Grecia Figueroa

You?

May 12, 2022, 7:32 AM

Grecia Figueroa

Good, heading to work in a bit.

May 12, 2022, 7:32 AM

Nathan Fletcher

How are you?

May 12, 2022, 7:31 AM

Grecia Figueroa

Happy Thursday!

May 12, 2022, 7:22 AM

Nathan Fletcher

Good morning

May 12, 2022, 7:21 AM

Grecia Figueroa

have a safe trip! :)

May 3, 2022, 4:00 PM

Nathan Fletcher

Alright — jumping on a zoom! See you Thursday

❤️ Grecia Figueroa

May 3, 2022, 4:00 PM

Grecia Figueroa

yes!

May 3, 2022, 3:57 PM

Nathan Fletcher

Not driving has it's benefits



Grecia Figueroa

I have to do it when I got visit fam in LA... but at least you can rest up on the way there... =)

May 3, 2022, 3:56 PM

Grecia Figueroa

eeehh ouch.. yeah I hate that drive at this time too... everyone is getting off work.

May 3, 2022, 3:55 PM

Grecia Figueroa

You got this!!

May 3, 2022, 3:55 PM

Nathan Fletcher

Traffic is pretty bad. Three hour drive up

May 3, 2022, 3:55 PM

Nathan Fletcher

The fundraising is a grind but you have to do it

May 3, 2022, 3:54 PM

Grecia Figueroa

is traffic bad?

May 3, 2022, 3:54 PM

Grecia Figueroa

nice!!

May 3, 2022, 3:54 PM

Grecia Figueroa

that's horrible. ugh.

May 3, 2022, 3:54 PM

Nathan Fletcher

I'm going to raise \$\$. Group of friends doing a fundraiser for me

❤ Grecia Figueroa



Nathan Fletcher

It's insane. And not just abortion. Ruling could undermine marriage equality, birth control, etc

May 3, 2022, 3:53 PM

Grecia Figueroa

lol

May 3, 2022, 3:53 PM

Grecia Figueroa

yay me

May 3, 2022, 3:53 PM

Grecia Figueroa

I'm almost off work... :)

May 3, 2022, 3:53 PM

Grecia Figueroa

where are you going?

May 3, 2022, 3:53 PM

Grecia Figueroa

Outraged by what is happening ...btw So great that you guys did that news conference today. 🙌🙌🙌

May 3, 2022, 3:53 PM

Nathan Fletcher

I'm in car going to LA:(

May 3, 2022, 3:51 PM

Nathan Fletcher

How are you?

May 3, 2022, 3:51 PM

Nathan Fletcher



https://instagram.com/stories/grecia_f/2830241447428429116

❤️ Grecia Figueroa



Nathan Fletcher

Deal!!

♥ Grecia Figueroa

May 3, 2022, 8:25 AM

Grecia Figueroa

Let's have a great day!!

May 3, 2022, 8:25 AM

Nathan Fletcher

And yea—defiantly wait for me to send you a message!

♥ Grecia Figueroa

May 3, 2022, 8:25 AM

Grecia Figueroa

I was gonna tell you! I'm always going to wait for you to write me first. Just in case your staff has your phone . I to be cautious

May 3, 2022, 8:25 AM

Nathan Fletcher

I want to apologize a bit. I was flirty and suggestive and I know not appropriate for me.

May 3, 2022, 8:24 AM

Nathan Fletcher

!!

May 3, 2022, 8:24 AM

Nathan Fletcher

Another day

May 3, 2022, 8:24 AM

Grecia Figueroa

Good morning!!! Rise and shine!

May 3, 2022, 8:24 AM

Nathan Fletcher

Good morning g



Nathan Fletcher

Night

❤️ Grecia Figueroa

May 2, 2022, 10:20 PM

Nathan Fletcher

Liked a message

May 2, 2022, 10:20 PM

Nathan Fletcher

Might Grecia

May 2, 2022, 10:20 PM

Grecia Figueroa

Sweet dreams :)

❤️ Nathan Fletcher

May 2, 2022, 10:20 PM

Nathan Fletcher

I'll try:) sleep isn't my strength but I know important

May 2, 2022, 10:20 PM

Grecia Figueroa

Anyways! I'm gonna get some rest. And get some rest as well. Promise?

May 2, 2022, 10:19 PM

Nathan Fletcher

Yup

May 2, 2022, 10:19 PM

Grecia Figueroa

Ufffff hahah immigrant...all the things they love to hate

May 2, 2022, 10:18 PM

Nathan Fletcher



Grecia Figueroa

I admire how you deal with them tbh

May 2, 2022, 10:18 PM

Grecia Figueroa

I don't want them tweeting about me having peruvian lunch lol

May 2, 2022, 10:17 PM

Nathan Fletcher

It's wild

May 2, 2022, 10:17 PM

Nathan Fletcher

They are insane.

May 2, 2022, 10:17 PM

Nathan Fletcher

Reacted 😄 to your message

May 2, 2022, 10:17 PM

Grecia Figueroa

You got all these crazies KUSI viewers after you. I gotta be careful ! Lol

😄 Nathan Fletcher

May 2, 2022, 10:17 PM

Nathan Fletcher

Ok!

May 2, 2022, 10:16 PM

Grecia Figueroa

Lol

May 2, 2022, 10:16 PM

Grecia Figueroa

Yes. I don't want to put my job in line either



Nathan Fletcher

You are good to be 100% discrete?

May 2, 2022, 10:16 PM

Nathan Fletcher

I have a lot to lose being flirty

May 2, 2022, 10:15 PM

Grecia Figueroa

Lol

May 2, 2022, 10:15 PM

Grecia Figueroa

Okay, im glad to hear that. I was a bit worried tbh.

May 2, 2022, 10:15 PM

Nathan Fletcher

My staff has access to my account so delete as we go.

May 2, 2022, 10:14 PM

Grecia Figueroa

Phew!

May 2, 2022, 10:14 PM

Grecia Figueroa

Okay good!!!

May 2, 2022, 10:14 PM

Nathan Fletcher

Oh yes

May 2, 2022, 10:14 PM

Grecia Figueroa

Are you making sure to delete our chats?

May 2, 2022, 10:13 PM



May 2, 2022, 10:13 PM

Nathan Fletcher

Reacted 👍 to your message

May 2, 2022, 10:13 PM

Grecia Figueroa

And no one grabs my phone. At all. (It has face recognition)

👍 Nathan Fletcher

May 2, 2022, 10:13 PM

Nathan Fletcher

And maybe company sometime!

❤️ Grecia Figueroa

May 2, 2022, 10:13 PM

Grecia Figueroa

Yup. No worries.

May 2, 2022, 10:12 PM

Nathan Fletcher

Can you do me a favor and delete our chats. I would hate for someone to grab your phone. You know

May 2, 2022, 10:12 PM

Grecia Figueroa

I'll see you Thursday!

May 2, 2022, 10:12 PM

Nathan Fletcher

OK!

May 2, 2022, 10:11 PM

Grecia Figueroa

You need you full 8 hrs of 😴

May 2, 2022, 10:11 PM



May 2, 2022, 10:11 PM

Grecia Figueroa

Well I'm going to bed soon. It was nice chatting with you.

May 2, 2022, 10:11 PM

Nathan Fletcher

I think so

May 2, 2022, 10:10 PM

Nathan Fletcher

Liked a message

May 2, 2022, 10:09 PM

Grecia Figueroa

That's so bittersweet when they get to that age

May 2, 2022, 10:09 PM

Grecia Figueroa

Awww!! Almost a teenager!!

May 2, 2022, 10:09 PM

Nathan Fletcher

I thing so

May 2, 2022, 10:08 PM

Grecia Figueroa

You need company 🙄

❤️ Nathan Fletcher

May 2, 2022, 10:08 PM

Nathan Fletcher

My little one. Turned 11

❤️ Grecia Figueroa

May 2, 2022, 10:08 PM



May 2, 2022, 10:08 PM

Grecia Figueroa

You said it was your sons bday recently right?!

May 2, 2022, 10:08 PM

Grecia Figueroa

Oh I see

May 2, 2022, 10:07 PM

Nathan Fletcher

They are with their mom. And lorena is in Sacramento

May 2, 2022, 10:07 PM

Grecia Figueroa

Where are the kids today?

May 2, 2022, 10:07 PM

Grecia Figueroa

Okie. :) and yeah that is close

May 2, 2022, 10:07 PM

Nathan Fletcher

Was being trusting:)

May 2, 2022, 10:07 PM

Grecia Figueroa

That is pretty close 🙄

May 2, 2022, 10:06 PM

Nathan Fletcher

I don't

May 2, 2022, 10:06 PM

Grecia Figueroa



Grecia Figueroa

With me it's fine. But I'm general 🙏

May 2, 2022, 10:06 PM

Grecia Figueroa

Don't do that! You are screen shotting your location .. you have to be careful

May 2, 2022, 10:06 PM

Nathan Fletcher

That's close:)

May 2, 2022, 10:05 PM

Grecia Figueroa

Hahahab 7 mins!

May 2, 2022, 10:05 PM

Grecia Figueroa

It's downtown, but it's a quieter area...and so close to work

May 2, 2022, 10:05 PM

Nathan Fletcher



May 2, 2022, 10:05 PM

Grecia Figueroa

On the blue dot

May 2, 2022, 10:04 PM

Grecia Figueroa



May 2, 2022, 10:04 PM

Nathan Fletcher

Show me!



Grecia Figueroa

Yup. Like right here. Look.

May 2, 2022, 10:04 PM

Nathan Fletcher

You are just down Broadway

May 2, 2022, 10:03 PM

Nathan Fletcher

Yeah

May 2, 2022, 10:03 PM

Grecia Figueroa

The hotel still?

May 2, 2022, 10:03 PM

Grecia Figueroa

Remember ? We are neighbors lol

May 2, 2022, 10:03 PM

Nathan Fletcher

Im over bye cruise shit terminal

May 2, 2022, 10:03 PM

Grecia Figueroa

No, I live on Broadway and 17th

May 2, 2022, 10:02 PM

Nathan Fletcher

You live DT near MTS?

May 2, 2022, 10:02 PM

Grecia Figueroa

Hahahahah

May 2, 2022, 10:02 PM



😄 Grecia Figueroa

May 2, 2022, 10:02 PM

Grecia Figueroa

Everyone

May 2, 2022, 10:01 PM

Grecia Figueroa

You were talking to Al...

May 2, 2022, 10:01 PM

Grecia Figueroa

I saw you talking to her, I didn't see anything sus

May 2, 2022, 10:01 PM

Grecia Figueroa

I think people are worried on what they are doing most of the time

May 2, 2022, 10:01 PM

Nathan Fletcher

I hope not.

May 2, 2022, 10:01 PM

Grecia Figueroa

Haha. I don't think people notice...

May 2, 2022, 10:00 PM

Nathan Fletcher

She didn't:)

May 2, 2022, 10:00 PM

Nathan Fletcher

Yes. Was like "Sharons gonna say something to me about it"

May 2, 2022, 10:00 PM



May 2, 2022, 9:59 PM

Nathan Fletcher

I worried today I was looking at you too much

May 2, 2022, 9:59 PM

Grecia Figueroa

I know. Don't worry.

May 2, 2022, 9:58 PM

Nathan Fletcher

I know—just being overly cautious.

May 2, 2022, 9:58 PM

Grecia Figueroa

I wouldn't be communicating with you if I felt uncomfortable :)

May 2, 2022, 9:58 PM

Nathan Fletcher

Liked a message

May 2, 2022, 9:58 PM

Grecia Figueroa

Of course. I promise

❤️ Nathan Fletcher

May 2, 2022, 9:57 PM

Nathan Fletcher

And if I say anything that makes you uncomfortable or is inappropriate you promise to tell me?

May 2, 2022, 9:57 PM

Nathan Fletcher

Way too many

May 2, 2022, 9:56 PM



May 2, 2022, 9:55 PM

Nathan Fletcher

So discreet

May 2, 2022, 9:55 PM

Grecia Figueroa

Yes I know. Absolutely

May 2, 2022, 9:55 PM

Nathan Fletcher

You get the problem we would have if out in public?

May 2, 2022, 9:55 PM

Nathan Fletcher

Reacted 😄 to your message

May 2, 2022, 9:54 PM

Grecia Figueroa

Jajaja

😄 Nathan Fletcher

May 2, 2022, 9:54 PM

Grecia Figueroa

True.. nvm

May 2, 2022, 9:54 PM

Nathan Fletcher

You need room for us both;)

😄 Grecia Figueroa

May 2, 2022, 9:53 PM

Nathan Fletcher

Reacted 😄 to your message

May 2, 2022, 9:53 PM



😄 Nathan Fletcher

May 2, 2022, 9:53 PM

Grecia Figueroa

Or a cabinet

May 2, 2022, 9:53 PM

Nathan Fletcher

I have a closet. No one would see us there:)

May 2, 2022, 9:53 PM

Grecia Figueroa

Hahahahaahha

May 2, 2022, 9:52 PM

Nathan Fletcher

Just have to find right setting. Like in a closet or something:)

😄 Grecia Figueroa

May 2, 2022, 9:52 PM

Nathan Fletcher

It is!!! And with you!!!!

❤️ Grecia Figueroa

May 2, 2022, 9:52 PM

Nathan Fletcher

Liked a message

May 2, 2022, 9:52 PM

Grecia Figueroa

Peruvian food should continue to be on that list :)

❤️ Nathan Fletcher

May 2, 2022, 9:52 PM

Nathan Fletcher

And feel good and fun



Nathan Fletcher

Im 100% for trying to find things in life that make you happy
May 2, 2022, 9:51 PM

Grecia Figueroa

It will end good too. We have that news conference Thursday
May 2, 2022, 9:51 PM

Nathan Fletcher

At least it started good:)
May 2, 2022, 9:51 PM

Grecia Figueroa

It will get better... or at least try to enjoy the little things :)
May 2, 2022, 9:51 PM

Nathan Fletcher

Hope springs eternal
May 2, 2022, 9:50 PM

Grecia Figueroa

Well, hopefully this week gets better. Monday has been crazy
May 2, 2022, 9:50 PM

Nathan Fletcher

Super secret
May 2, 2022, 9:48 PM

Nathan Fletcher

Yes!!!
May 2, 2022, 9:48 PM

Grecia Figueroa

I'm sure. Well maybe one day that your security guards aren't there or you are in a private setting
May 2, 2022, 9:48 PM



May 2, 2022, 9:47 PM

Grecia Figueroa

That sucks .. you get no privacy

May 2, 2022, 9:46 PM

Grecia Figueroa

I bet! Haha I bet. True true. But carlos present could have helped the situation

May 2, 2022, 9:46 PM

Nathan Fletcher

With you—full blown scandal:)

May 2, 2022, 9:45 PM

Nathan Fletcher

People took pictures if me eating — with Carlos

May 2, 2022, 9:45 PM

Nathan Fletcher

If I went to lunch with you (beautiful woman) our lunch would be on social media in 10 minutes

May 2, 2022, 9:45 PM

Grecia Figueroa

Awww! Well I'm sure it was still yummy

May 2, 2022, 9:44 PM

Nathan Fletcher

Beans. Tortilla. That's it:)

May 2, 2022, 9:44 PM

Grecia Figueroa

What did you have?

May 2, 2022, 9:44 PM

Nathan Fletcher



Grecia Figueroa

Awww!! I can't believe you had it and I wasn't there :(

May 2, 2022, 9:43 PM

Grecia Figueroa

(aka you too)

May 2, 2022, 9:43 PM

Nathan Fletcher

I just made dinner for myself! Not as good as Eli's

May 2, 2022, 9:43 PM

Grecia Figueroa

I feel like at least in California we are some what "safe" ...and people in office who care and do the right thing

May 2, 2022, 9:43 PM

Grecia Figueroa

It really is... it makes me worried for people in red/ conservative states

May 2, 2022, 9:42 PM

Nathan Fletcher

Just watching MSNBC on roe stuff. It's awful

May 2, 2022, 9:42 PM

Nathan Fletcher

Liked a message

May 2, 2022, 9:41 PM

Grecia Figueroa

Oh my God! Idk how you do it 🙌

❤️ Nathan Fletcher

May 2, 2022, 9:41 PM

Nathan Fletcher

And all home alone tonight



Nathan Fletcher

And all amped up from class and energy from students!!!

May 2, 2022, 9:41 PM

Nathan Fletcher

I just got home. Had to teach 3 hour class at UCSD!!

May 2, 2022, 9:40 PM

Grecia Figueroa

I know ...How are you still up?you must be exhausted! :(

May 2, 2022, 9:40 PM

Nathan Fletcher

The day started so calm:(

May 2, 2022, 9:39 PM

Nathan Fletcher

 https://instagram.com/stories/grecia_f/2829375459623816799

 Grecia Figueroa

May 2, 2022, 9:28 PM

Nathan Fletcher

 https://instagram.com/stories/grecia_f/2829339560894154515

 Grecia Figueroa

May 2, 2022, 9:28 PM

Nathan Fletcher

 https://instagram.com/stories/grecia_f/2820072574630192984

 Grecia Figueroa

Apr 19, 2022, 5:44 PM

Grecia Figueroa

Whaaat!! This is wayyyy cool!     And for the US Open Cup game, nice!!

Apr 8, 2022, 2:06 PM



the game ball to kick off the match!

nathan_fletcher

<https://www.instagram.com/p/CcGsEuzP4qO/?>

feed_type=reshare_chaining&carousel_share_child_media_id=2812128856515775118_183828023

Apr 8, 2022, 2:06 PM

Nathan Fletcher

Liked a message

Apr 7, 2022, 10:31 AM

Grecia Figueroa

Likewise!! I'll bring you your little llama magnet next week 🦙

❤️ Nathan Fletcher

Apr 7, 2022, 10:29 AM

Nathan Fletcher

Very nice to see you

❤️ Grecia Figueroa

Apr 7, 2022, 10:26 AM

Nathan Fletcher

Back to my social media fast:) talk later

❤️ Grecia Figueroa

Mar 8, 2022, 5:32 AM

Grecia Figueroa

haha, yes!

Mar 7, 2022, 3:41 PM

Nathan Fletcher

We are neighbors!!!

Mar 7, 2022, 3:36 PM

Grecia Figueroa

you are living the life!! I'm on Broadway, 5 minute commutes are the best.

Mar 7, 2022, 3:34 PM



♥ Grecia Figueroa

Mar 7, 2022, 3:28 PM

Grecia Figueroa

woah, that's rough. At least your commute to work is a lot shorter. You can just roll over from bed and be in the hehe

Mar 7, 2022, 3:26 PM

Grecia Figueroa

Okay, it's called "11M: Terror in Madrid"

Mar 7, 2022, 3:24 PM

Nathan Fletcher

Probably three more months in hotel

Mar 7, 2022, 2:00 PM

Nathan Fletcher

I don't mind being sad. Makes you enjoy when happy

Mar 7, 2022, 2:00 PM

Grecia Figueroa

how much longer are you going to be living in the hotel?

Mar 7, 2022, 12:35 PM

Grecia Figueroa

but it is fascinating because it delves into how a terrorist attack on the trains impacted the presidential election Spain 3 days later, to where the winning candidate ended up losing, simply based on how he managed the crisis

Mar 7, 2022, 12:34 PM

Grecia Figueroa

uhmm I don't know if you should watch it...it's going to make you sad. Though it's interesting, it's a little sad...

Mar 7, 2022, 12:32 PM

Nathan Fletcher

I have another very rare Monday night with no wife or kids. I get bored with nothing to do... so maybe I'll try the documentary you suggested again.



Nathan Fletcher

Liked a message

Mar 7, 2022, 12:19 PM

Grecia Figueroa

Hello! Nice to see you, great job today!

♥ Nathan Fletcher

Mar 7, 2022, 12:18 PM

Nathan Fletcher

Broke my social media fast to say hello:)

Mar 7, 2022, 12:05 PM

Nathan Fletcher

Perfect!!!!

Mar 2, 2022, 4:06 PM

Grecia Figueroa

okay i'll hold you to that! hehe I'll email you from my personal email, so you can have it as well! :)

Mar 2, 2022, 4:05 PM

Grecia Figueroa

That's good!!! I'm glad you are! You don't need people's toxicity and useless comments in your life.

Mar 2, 2022, 4:05 PM

Nathan Fletcher

My staff will post stuff but I'm taking them all off my phone. Little break but would love to hear any movie tips anything else!

♥ Grecia Figueroa

Mar 2, 2022, 4:01 PM

Nathan Fletcher

I am giving up social media for lent! Talking to you has been great but overall it is so toxic! But please feel free email me. My personal email is nathan@nathanfletcher.com

♥ Grecia Figueroa

Mar 2, 2022, 4:00 PM



Mar 2, 2022, 4:00 PM

Nathan Fletcher

I fell asleep:(
Mar 2, 2022, 3:59 PM

Grecia Figueroa

Did you end up watching it...orrr you fell asleep? :)
Mar 2, 2022, 3:49 PM

Grecia Figueroa

So how did you like the movie?
Mar 2, 2022, 3:49 PM

Nathan Fletcher

I'll do it
❤️ Grecia Figueroa
Feb 28, 2022, 7:41 PM

Grecia Figueroa

Enjoy! Choose the dubbed in English option, so you don't have to read captions.
Feb 28, 2022, 7:36 PM

Nathan Fletcher

I'll watch tonight! Home alone—no wife or kids
❤️ Grecia Figueroa
Feb 28, 2022, 7:26 PM

Grecia Figueroa

So good!
Feb 28, 2022, 7:25 PM

Grecia Figueroa

<https://www.news9live.com/entertainment/ott/11m-terror-in-madrid-review-an-investigative-documentary-the-balances-reason-and-rage-155893>
11M: Terror in Madrid is a classic example of art reclaiming the humanity that history failed to inspire.



Grecia Figueroa

I have a Netflix movie recommendation. 11M:Terror in Madrid
It Just came out. You will like it

Feb 28, 2022, 7:25 PM

Nathan Fletcher

OMG

Feb 28, 2022, 7:25 PM

Grecia Figueroa

Their investigative in-depth piece on your Instagram was remarkable.



Feb 28, 2022, 7:22 PM

Nathan Fletcher



https://instagram.com/stories/grecia_f/2783481303309204707

Feb 28, 2022, 7:19 PM

Nathan Fletcher

And even journalism is so different. KUSI

Feb 28, 2022, 7:19 PM

Nathan Fletcher

It is soooo wild right now. Disheartening at times. But we have been through these periods before



Feb 28, 2022, 7:10 PM

Grecia Figueroa

I don't. But sometimes friends still ask me to break down complex current events for them. It's my way of helping generation stay informed with facts and not believe conspiracy theories they read on memes lol. 🤔 crazy world there! 🤔

Feb 28, 2022, 6:44 PM

Nathan Fletcher

You miss journalism?

**Nathan Fletcher**

Reacted 😊 to your message

Feb 28, 2022, 6:30 PM

Grecia Figueroa

Wow. That must have been a very interesting experience!
In a past life I was a political news reporter, so those topics still fascinate me.
Not that local government isn't exciting!

😊 Nathan Fletcher

Feb 28, 2022, 6:13 PM

Nathan Fletcher

In a previous life I was a human intelligence operative — Yemen, Somalia, etc. I really miss the international stuff that local government isn't exciting:)

❤️ Grecia Figueroa

Feb 28, 2022, 3:37 PM

Nathan Fletcher

Liked a message

Feb 28, 2022, 3:35 PM

Grecia Figueroa

Aw thank you! You are too sweet. I appreciate you!

❤️ Nathan Fletcher

Feb 28, 2022, 2:37 PM

Nathan Fletcher

Your Ukraine presentation was awesome! You should be ambassador!

❤️ Grecia Figueroa

Feb 28, 2022, 1:00 PM

Nathan Fletcher

Liked a message

Feb 14, 2022, 11:30 AM

Grecia Figueroa

Nice to see you too! Have a great day 😊

❤️ Nathan Fletcher



Nathan Fletcher

Nice to see you!

Feb 14, 2022, 11:11 AM

Nathan Fletcher

Liked a message

Feb 13, 2022, 9:19 PM

Grecia Figueroa

Yes!

❤️ Nathan Fletcher

Feb 13, 2022, 7:28 PM

Grecia Figueroa



Feb 13, 2022, 7:28 PM

Nathan Fletcher



https://instagram.com/stories/grecia_f/2704366902094649155

❤️ Grecia Figueroa

Nov 11, 2021, 2:58 PM

Nathan Fletcher



https://instagram.com/stories/grecia_f/2704846352646765085

❤️ Grecia Figueroa

Nov 11, 2021, 2:58 PM

Nathan Fletcher



https://instagram.com/stories/grecia_f/2697737205668815749

Nov 1, 2021, 9:53 PM

Nathan Fletcher



https://instagram.com/stories/grecia_f/2691806568844332796

❤️ Grecia Figueroa



Nathan Fletcher



https://instagram.com/stories/grecia_f/2686653402725183081

♥ Grecia Figueroa

Oct 17, 2021, 4:06 PM

Grecia Figueroa

https://instagram.com/stories/grecia_f/2647644096474604694

Aug 24, 2021, 2:23 PM



February 21

4:14 PM

Edit



New Blog:
"Trials & Tribulations"

"BEHIND EVERY
STRONG
WOMAN IS A
STORY THAT
GAVE HER NO
CHOICE"

Nathan Fletcher

READ OR LISTEN HERE

36



36



Viewers



Nathan Fletcher






nathan_fletcher 

Politician

I just got home. Had to teach 3 hour class at UCSD!!

And all amped up from class and energy from students!!!

And all home alone tonight

Oh my God! Idk how you do it 





nathan_fletcher



Politician

Reacted to your story



Only you can see this



The day started so calm:(

I know ...How are you still up?you must be exhausted! :(

I just got home. Had to teach 3 hour class at UCSD!!

And all amped up from class and energy from students!!!



And all home alone tonight

Oh my God! Idk how you do it 💪



Just watching MSNBC on roe stuff.



Message...



Pltf Comm_00120

ATTACHMENT 2



Grecia Figueroa

grecia_f threads.net



I don't thread, I sew. 🧵🧵

🌐 Public Relations & Marketing | Trilingual

🏆 2x Emmy award-winning journalist

📍 San Diego, CA

374 followers · linktr.ee/Grecia_f



Threads

Replies



grecia_f

2d ...

Can you and your husband stop stalking me????.... Leave me alone. What's going to come out in discovery is damming af. As a woman myself I'm incredibly disappointed as to how this person acted.

Leave me alone. [@lorenasgonzalez](#) stop stalking me.
And this is the person that leads all California Labor unions???

Once I can speak, I will be very loud.



6 replies · 8 likes



grecia_f

6d ...

ATTACHMENT 3



Scott Lewis @vosdscott · Aug 22



If you're doing something not great in Instagram direct messages, this could be your future. Nathan Fletcher has subpoenaed his accuser's DMs but her attorneys now want to quash it because they say it's too broad.



3

3

14

7.9K



Show more replies



Grecia Figueroa ✓ @GreciaFigueroaN · Aug 22



Nothing about it was consensual.

2

1

2

513



Grecia Figueroa ✓ @GreciaFigueroaN · Aug 22



I will, absolutely.

0

1

1

293



ATTACHMENT 4

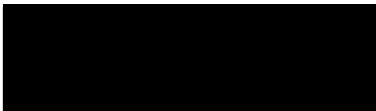


**Metropolitan
Transit
System**

PLTFF021

February 17, 2023

Via email [REDACTED]



RE: Termination of Employment

Dear Ms. Figueroa:

The purpose of this communication is to inform you that, effective today, your employment is terminated for the reasons set forth in this letter.

On June 26, 2019, MTS hired you as a Marketing Specialist. On April 19, 2022, as part of a departmental restructure, your title was changed to Public Relations Specialist. During your tenure at MTS, your overall performance has been inconsistent. You perform well in certain aspects of your job, like media relations, but poorly in others such as writing, follow up, meeting deadlines, and prioritizing your work. Your shortcomings require that your supervisors spend a substantial amount of time double checking your work, correcting your errors, and directly managing your assignments.

You have received repeated warnings regarding your performance deficiencies, in person, via email, and in formal performance evaluations. There have been brief periods of improvement that provided hope that you could meet the overall demands of the position. However, over 3.5 years later, it has become clear that your inconsistent performance will not change, and management of your department no longer believe that you meet the job's minimum performance standards.

In all four (4) of your previous performance reviews, you were warned to varying degrees that your written communication and project management skills needed improvement. You were given specific guidance on how to improve and what would constitute adequate performance. For example, you were directed to take project management courses to improve your time management skills and allow you to meet deadlines, but you never completed.

In your most recent performance review, which was given to you in writing in August 2022 and you signed for on November 14, 2022, management went into significant detail about your performance issues during that review period, and admonished you that your job was in jeopardy. In the Performance Summary portion on pages 11 and 12, they concluded with the following admonishment:

We believe that Grecia has the potential to be a high performer, as her 'Areas of

1255 Imperial Avenue, Suite 1000, San Diego, CA 92101-7490 • (619) 231-1466 • sdmts.com

San Diego Metropolitan Transit System (MTS) is a California public agency comprised of San Diego Transit Corp., San Diego Trolley, Inc. and San Diego and Arizona Eastern Railway Company (a not-for-profit public benefit corporation). MTS member agencies include the cities of Chula Vista, Coronado, El Cajon, Imperial Beach, La Mesa, Lemon Grove, National City, Poway, San Diego, San Marcos, and the County of San Diego. MTS is also the For Hire Vehicle administrator for nine cities.



Strengths' are excellent, and want to see her succeed in her new position. **However, immediate and sustained improvement in the 'Areas of Improvement' section is necessary to maintain employment.** Due to ongoing performance issues, we are recommending a 3% merit increase. However, Mark and I will formally re-review your performance in 3 to 6 months. If there is significant improvement, we will recommend an additional 3% increase. (Emphasis added)

Mr. Olson and Ms. Bishop have continued to evaluate your work since your performance review, and you continue to exhibit the same deficiencies. Specifically, you continue to have time management problems, miss important deadlines, and turn in work that needs to be heavily edited or reworked.

Some recent examples are:

a. Intelligent Transport Article:

- Mr. Olson forwarded an inquiry for a guest article in Intelligent Transport to you on October 18, 2022 and asked you to secure a spot. On November 10, seeing no response, Mr. Olson followed up. You claimed to not have seen the original email, and subsequently reached out to secure a December 5 deadline.
- On December 2, Mr. Olson asked Ms. Bishop to reach out for a status update. You confirmed you did secure the spot, but that no progress had been made to outline/develop content; at that time the deadline was extended one week to December 12.
- After no content was provided by Friday, December 9, and you called out of work, Ms. Bishop requested the draft article/current outline several times as the Monday deadline was impending. When staff finally received the copy at 4:30 p.m. December 9, only 40 – 50% of the word count requirement had been met.
- The final article was not submitted until December 16, 11 days after the first deadline and four days after the second deadline.

b. Progressive Railroading Article:

- A query from Progressive Railroading came in November 28, 2022 with a deadline of December 16, 2022. In an email to both Rail Operations and you on the same day, Mr. Olson asked you to gather the responses and make a submission to the reporter.
- Rail Operations staff provided their responses on November 29. However, no progress was made in finalizing the content until Mr. Olson reached out to you to ask about the status on December 12. You responded that you thought Mr. Olson had already handled it, even though Mr. Olson had assigned the project to you.
- Mr. Olson provided final edits of the content to you on the morning of December 15.
- On December 16 (the deadline), the response was not submitted. Mr. Olson had to send a reminder to you on Monday, December 19 to ask you to submit the responses.

c. MTS Connections:

- Discussions for the first edition of the MTS Connections newsletter began in July 2022, and the original distribution date was set for mid-September. Upon Ms. Bishop returning from vacation in early August, the deadline for the newsletter had been pushed back two weeks by you, seemingly arbitrarily, as no reason was given for the change. There were not clear (or possibly, realistic) timelines throughout the process, and ultimately the edition did not get distributed until mid-November.
- Given the challenges and delays in publishing the first edition that you managed, the next edition of MTS Connections was discussed with you during check-in meetings on December 1 and December 7. Ms. Bishop requested that you create a project timeline by working backward from a distribution deadline of mid-February. You were asked to provide topics by December 16; as of that day, nothing had been provided and Ms. Bishop followed up to ask you for them by December 20 at the latest.
- Topics were not provided by you until after staff had left the office (early for the holiday weekend) on December 23, 2022 and most of the content ideas had to be reworked entirely by Mr. Olson and Ms. Bishop.
- Story deadlines for staff were due on January 25. As of January 26, you and two other contributing writers had not written your assignments (about half the edition's content), and the distribution is expected to be delayed from the initial goal by a minimum of two weeks.

d. Laptop Scholarship Essay Contest:

- In initial conversations with Ms. Bishop, and in the performance review given to you in August 2022, one of your performance metrics was to "Successfully execute the 2022 Laptop Scholarship contest in fall 2022, with final submission date no later than November 4, 2022." However, when it became clear that the timeline would not be met, Ms. Bishop adjusted the date to be "November 2022" in an effort to try and help you achieve the goal.
- On August 23, 2022, you reported to have had essay topics that you would send "in a few days", but the prompts were not submitted until September 16.
- In an email response on September 22, Mr. Olson stated he wanted the contest's end date to be November 18 before the Thanksgiving holiday (with an earlier launch/submission date), but you pushed for and selected the November 25 deadline.

e. News Releases:

- In general, timelines that were outlined in the media management document you created were not consistently met (i.e., submitting draft news releases to Mr. Olson and/or Ms. Bishop with little time for review), putting pressure on other staff and departments to turn around content the same day or next day in many cases.

- Several special event news releases that had been discussed during check-in meetings with Ms. Bishop were never executed (e.g., Elton John, December Nights).
-
- f. You were assigned to complete project management courses in three annual reviews (2020, 2021, 2022). To-date, those have not been completed.
- g. You continued to come to work late after repeated warnings.

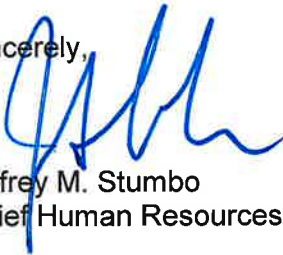
Mr. Olson and Ms. Bishop agree that you perform well in certain areas, like media relations. However, they have lost confidence in your ability to perform adequately in all aspects of your job, because you have been given ample opportunity to improve. In short, MTS has higher expectations for this position and can no longer tolerate the additional workload placed on others by your errors and inability to meet deadlines.

MTS does not believe that your shortcomings were purposeful or malicious, so the Agency attempted to offer you severance pay via a Separation Agreement to ease your transition to other employment. On Monday, February 6, 2023, I explained that MTS had decided to part ways with you, and I explained the terms of the proposed the Separation Agreement. Since February 6, despite repeated requests, you have been unwilling to engage in meaningful communications regarding the Separation Agreement.

When you accepted employment in June of 2019, you signed an offer letter agreeing that your employment is at will, and that you or MTS could end the employment relationship at any time for any reason or no reason. MTS has decided to exercise this option and terminate your employment for the reasons set forth in this letter.

Please contact me if you have any questions. We wish you every success in your future endeavors.

Sincerely,



Jeffrey M. Stumbo
Chief Human Resources Officer (EEO Officer)

1. Employee Probationary Performance Review signed February 18, 2020
2. Employee Annual Performance Review signed October 8, 2020
3. Employee Annual Performance Review signed November 2, 2021
4. Employee Annual Performance Review signed November 14, 2022
5. Employment Offer Letter signed June 26, 2019

cc: Mark Olson, Director of Marketing and Communications
Stacie Bishop, Marketing and Communications Manager
Personnel File

ATTACHMENT 5

1 BUCHALTER
A Professional Corporation
2 TRACY A. WARREN (SBN: 228013)
KATHRYN B. FOX (SBN: 279705)
3 YVONNE A. RICARDO (SBN: 328278)
655 W. Broadway, Suite 1600
4 San Diego, CA 92101
Telephone: 619.219.5335
5 Email: twarren@buchalter.com
kfox@buchalter.com
6 yricardo@buchalter.com

7 Attorneys for Defendant
CHRISTIAN UNIFIED SCHOOLS OF SAN DIEGO

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego

12/21/2023 at 07:04:00 PM

Clerk of the Superior Court
By Nora Lopez, Deputy Clerk

9 **SUPERIOR COURT OF CALIFORNIA**
10 **COUNTY OF SAN DIEGO**

12 VICKI CARRINGTON, an individual,

13 Plaintiff,

14 v.

15 CHRISTIAN UNIFIED SCHOOLS OF SAN
DIEGO, a California religious corporation;
16 and DOES 1 through 50, inclusive,

17 Defendants.

Case No. 37-2023-00024430-CU-WT-CTL

**DECLARATION OF TRACY A. WARREN IN
SUPPORT OF OPPOSITION TO PLAINTIFF
VICKIE CARRINGTON'S MOTION TO SET
ASIDE SANCTIONS ORDER**
*(Filed concurrently with Opposition to Motion to
Set Aside)*

Assigned for All Purposes to
Hon. Matthew C. Braner, Dept. C-60

[IMAGED FILE]

Date: January 5, 2024
Time: 9:00 a.m.
Dept: C-60

Action Filed: June 12, 2023
Trial: Not set

1 **DECLARATION OF TRACY A. WARREN**

2 I, Tracy A. Warren, declare and state as follows:

3 1. I am an attorney duly licensed to practice in the State of California and I am a
4 Managing Shareholder with Buchalter, APC, attorneys of record for Defendant Christian Unified
5 Schools of San Diego (“CUSSD”) in this action. I know the following facts to be true to my own
6 personal knowledge and if sworn as witness, I could and would testify competently to the truth
7 thereof.

8 2. A true and correct copy of the Declaration of Susan Lanz in Support of CUSSD’s
9 Motion for Sanctions as to Plaintiff’s First Amended Complaint is attached hereto as **Exhibit 1**.

10 3. In a letter dated June 27, 2022, Plaintiff’s counsel requested Plaintiff’s personnel
11 file and payroll records. Attached as **Exhibit 2** is a true and correct copy of counsel’s June 27, 2022
12 letter.

13 4. On July 20, 2022, CUSSD produced Plaintiff’s wage statements from August 1,
14 2017 to June 30, 2022. Attached as **Exhibit 3** is a true and correct copy of my Associate Yvonne
15 A. Ricardo’s and my correspondence to Plaintiff’s counsel dated July 19, 2022 and sent on July 20,
16 2022, including the enclosed wage statements for August 1, 2021 through June 30, 2023 bates nos.
17 CUSSD_000087-97; CUSSD_000112-125.

18 5. On July 29, 2022, CUSSD produced Plaintiff’s personnel file. Attached as **Exhibit**
19 **4** is a true and correct copy of Ms. Ricardo’s and my correspondence to Plaintiff’s counsel dated
20 July 29, 2022 and the enclosed employment agreement between Plaintiff and CUSSD for the period
21 of August 1, 2021 to June 30, 2022 bates nos. CUSSD000130-134.

22 6. On June 15, 2023, Plaintiff served her Complaint against CUSSD alleging (1) breach
23 of employment contract; (2) breach of implied covenant of good faith and fair dealing, (3) wrongful
24 termination in violation of public policy, and (4) intentional infliction of emotional distress
25 (“IIED”).

26 7. On May 16, 2023, Plaintiff filed an unperfected charge of discrimination with the
27 Equal Employment Opportunity Commission (“EEOC”) and the California Civil Rights
28 Department (“CRD”) alleging discrimination on the basis of age, color, race, retaliation, sex

1 involving issues of layoff and discharge. That same day, the California Civil Rights Department
2 (“CRD”) issued a right to sue letter. On June 20, 2023, Plaintiff filed a perfected Amended Charge
3 of Discrimination with the EEOC and CRD. On July 7, 2023, the EEOC issued a dismissal and
4 notice of right to sue. As of the date of filing this opposition, Plaintiff has not filed a complaint to
5 include claims under the Fair Employment and Housing Act (“FEHA”) or Title VII of the Civil
6 Rights Act of 1964. A true and correct copy of Plaintiff’s May 16, 2023 charge of discrimination
7 filed with the EEOC and the June 20, 2023 Amended Charge of Discrimination filed with the CRD
8 and EEOC are attached hereto as **Exhibit 5 and 6** respectively. As of the date of filing this
9 opposition, Plaintiff has not filed a complaint to include claims under the Fair Employment and
10 Housing Act (“FEHA”) or Title VII of the Civil Rights Act of 1964 (“Title VII”).

11 8. On July 12, 2023, CUSSD informed Plaintiff and her counsel of its arguments in
12 support of a section 128.7 motion for filing the initial complaint and requested Plaintiff confirm
13 that she’d withdraw her Complaint before the motion was drafted and served. CUSSD further
14 informed Plaintiff that any amendments to include claims of discrimination would be futile as
15 CUSSD is not an employer subject to FEHA and that Plaintiff failed to timely file an administrative
16 charge with the EEOC. Plaintiff did not respond. Attached as **Exhibit 7** is a true and correct copy
17 of Ms. Ricardo’s July 12, 2023 correspondence to Plaintiff’s counsel copying me.

18 9. On July 14, 2023, CUSSD served Plaintiff and her counsel a Motion for Sanctions
19 Pursuant to Section C.C.P. § 128.7 for filing her initial complaint, which included Plaintiff’s
20 personnel file and payroll records as exhibits.

21 10. On July 27, 2023, the Parties met and conferred to discuss the deficiencies of
22 Plaintiff’s Complaint. Ms. Ricardo immediately informed me of her conversation with Plaintiff’s
23 counsel. Plaintiff’s counsel acknowledged that FEHA did not apply to CUSSD. However,
24 Plaintiff’s counsel contended that Plaintiff could proceed with her claims under Title VII despite
25 the untimely filing and contest any statute of limitations arguments through motion practice.
26 Plaintiff’s counsel represented that Plaintiff would amend her Complaint to remedy the deficiencies
27 of her four causes of action. A true and correct copy of Ms. Ricardo’s email summarizing the meet
28 and confer call and opposing counsel’s confirmation of the accuracy thereof and copying me is

1 attached hereto as **Exhibit 8**.

2 11. Plaintiff requested an additional two weeks to amend their complaint, essentially
3 extending their safe harbor period to August 18, 2023. CUSSD agreed to permit Plaintiff to file her
4 FAC by August 18, 2023. A true and correct copy of Senior Counsel Kathryn B. Fox and Ms.
5 Ricardo's correspondence with opposing counsel copying me is attached hereto as **Exhibit 9**.

6 12. On August 18, 2023, Plaintiff filed her First Amended Complaint ("FAC"), which
7 alleged the same four causes of action and differed only slightly from the original complaint.

8 13. On August 28, 2023, CUSSD served its Motion for Sanctions pursuant to Code of
9 Civil Procedure § 128.7 (the "Motion for Sanctions") on Plaintiff. Plaintiff did not withdraw or
10 seek to amend her FAC during the 21-day safe harbor period.

11 14. On September 21, 2023, CUSSD filed its Motion for Sanctions. In Opposition,
12 Plaintiff did not submit her own declaration to support her claims.

13 15. On September 14, 2023, Plaintiff served her first set of Form Interrogatories-
14 General, Form Interrogatories-Employment, Special Interrogatories, and Requests for Production
15 on CUSSD. On October 17, 2023, CUSSD provided its responses to Plaintiff's discovery requests.

16 16. On October 19, 2023, this Court issued a tentative order granting CUSSD's Motion
17 for sanctions.

18 17. On October 20, 2023, this Court heard CUSSD's Motion for Sanctions. At the
19 hearing, Plaintiff's counsel represented that Plaintiff could allege discrimination claims under Title
20 VII or California Business and Professions Code § 17200 *et seq.* The Court took the parties'
21 arguments under submission.

22 18. Following the hearing, CUSSD and Plaintiff met and conferred telephonically where
23 CUSSD again requested Plaintiff to withdraw her Complaint and reiterated its position as to why
24 Plaintiff's claims are frivolous and that she suffered no damages. Plaintiff's counsel indicated "We
25 don't care if we get damages. We are going to get publicity."

26 19. On November 21, 2023, a month after the hearing, This Court issued its order
27 granting the Motion for Sanctions, awarding sanctions in the amount of \$5,000 against Plaintiff and
28 her counsel, but granting Plaintiff leave to amend her Complaint. Plaintiff now requests this Court

1 to review its Sanctions Order through its Motion to Set Aside the Sanctions Order filed on
2 December 12, 2023.

3 20. Ms. Ricardo spent 14.3 hours drafting the Motion for Sanctions against Plaintiff for
4 filing her initial complaint. At her billable rate of \$350.00 per hour, she charged a total of \$5,005.00
5 to draft this instant Motion.

6 21. I spent 1.0 hour drafting the Motion for Sanctions against Plaintiff for filing her
7 initial complaint. At my billable rate of \$505.00 per hour, I charged a total of \$505.00 to draft this
8 Motion.

9 22. Ms. Ricardo spent 12.5 hours drafting the Motion for Sanctions against Plaintiff for
10 filing the FAC. At her billable rate of \$350.00 per hour, she charged a total of \$4,375.00 to draft
11 the Motion for Sanctions against Plaintiff for filing her FAC.

12 23. I spent 2.0 hour drafting the Motion for Sanctions against Plaintiff for filing the
13 FAC. At my billable rate of \$505.00 per hour, I charged a total of \$1,010.00 to draft the Motion for
14 Sanctions against Plaintiff for filing the FAC.

15 24. Ms. Ricardo spent an additional 8.0 hours reviewing Plaintiff's opposition, drafting
16 Defendant's reply, preparing and attending the hearing on the Motion for Sanctions against Plaintiff
17 for filing her FAC. At her billable rate of \$350.00 per hour, she charged an additional \$2,800
18 associated with bringing the Motion for Sanctions before the Court.

19 25. I spent an additional 4.0 hours reviewing Plaintiff's opposition, drafting Defendant's
20 reply, preparing and attending the hearing on this Motion. At my billable rate of \$505.00 per hour,
21 I charged an additional \$2,020.00 associated with bringing the Motion for Sanctions before the
22 Court.

23 26. CUSSD also incurred the filing fee associated with the Motion for Sanctions. I am
24 informed and believe that the cost associated with this filing will total \$485.00

25 27. Ms. Ricardo spent another 12 hours drafting the Opposition to the Motion to Set
26 Aside. I anticipate she will spend another 4 hours reviewing Plaintiff's reply, preparing for and
27 attending the hearing on the Motion to Set Aside. At her billable rate of \$350.00 per hour, I
28 anticipate she will charge an additional \$5,600.

ATTACHMENT 6



1 reply · View likes



pete_the_dog11

7h ...

Fletcher is/was/will ALWAYS be a
PIECE OF 🍌



View likes



grecia_f

5h ...

And then they wonder why I sued.
As if I didn't have all the proof.



EXHIBIT B



fisherphillips.com

August 7, 2023

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Suite 1000
San Diego, CA 92121

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THE PRIDE LAW FIRM
2831 Camino Del Rio South, Suite 104
San Diego, California 92108

Re: Grecia Figueroa v. Nathan Fletcher, et al.
San Diego Superior Court Case No. 37-2023-00012828-CU-OE-CTL

Dear Counsel:

We are in receipt of Plaintiff's First Amended Complaint, filed July 14, 2023. Please accept this correspondence as our good faith effort to meet and confer pursuant to Code of Civil Procedure sections 430.41 and 435.5 regarding Mr. Nathan Fletcher's prospective demurrer and/or motion to strike. As discussed in detail below, Plaintiff's First Amended Complaint is subject to a motion to strike given that it contains numerous irrelevant, improper, and immaterial allegations. Additionally, her FEHA claims against Mr. Fletcher are subject to demurrer for failure to sufficiently allege viable causes of action. Please advise no later than the close of business on **Wednesday, August 9, 2023** as to whether Plaintiff will agree to voluntarily dismiss or amend her FAC in accordance with the defects identified below.

I. Motion to Strike

California Code of Civil Procedure section 436 states that a court may strike out any irrelevant, false, or improper matter inserted in any pleading, as well as all or any part of any pleading not drawn or filed in conformity with the laws of this state, a court rule, or an order of the court. (Ca. Code Civ. Proc. §436(a)-(b)). "Irrelevant" material that may be stricken pursuant to Section 436 includes "immaterial" allegations. (See Cal. Code Civ. Proc. §431.10 (c).) To this end, an "immaterial allegation in a pleading includes any "allegation that is not essential to the statement of a claim or defense," as well as any "allegation that is neither pertinent to nor supported by an otherwise sufficient claim or defense." (See Cal. Code Civ. Proc. §431.10 (b)(1)(2)).

Fisher & Phillips LLP

Atlanta • Baltimore • Boston • Charlotte • Chicago • Cleveland • Columbia • Columbus • Dallas • Denver • Detroit • Fort Lauderdale • Gulfport • Houston
Irvine • Kansas City • Las Vegas • Los Angeles • Louisville • Memphis • Nashville • New Jersey • New Orleans • New York • Orlando • Philadelphia
Phoenix • Pittsburgh • Portland • Sacramento • San Diego • San Francisco • Seattle • Tampa • Washington, DC • Woodland Hills

FP 47725936.3

Here, Plaintiff's FAC contains numerous words, sentences, and paragraphs that are either irrelevant, improper, or immaterial. For example:

- FAC Paragraph 2 states that "...Fletcher is married to former California State Assemblywoman Lorena Gonzalez..." Given that Ms. Gonzalez is not a party to this action and there are no allegations that she participated in – or was even aware of – any conduct described in the FAC, this this statement is wholly irrelevant to any of Plaintiff's claims. It must be voluntarily stricken.
- FAC Paragraph 26 states that "Fletcher and his family were living at a hotel in downtown San Diego while repairs were being made to their home. Fletcher's wife, former State Assemblywoman Lorena Gonzalez Fletcher, spent much of her time in Sacramento and other cities throughout California, at which times Fletcher often stayed in San Diego." The general description of Mr. Fletcher's living arrangements and his family's travel plans have no bearing on any of plaintiff's causes of action, nor do they have any probative value to any of the material facts. Thus, this statement is wholly irrelevant to any of Plaintiff's claims. It must be voluntarily stricken.
- FAC Paragraphs 57-68 improperly refer to confidential, pre-litigation settlement communications. To this end, the communications are both privileged and inadmissible at trial. For this reason, they are irrelevant and immaterial to all of Plaintiff's claims and must be voluntarily stricken.
- Third Cause of Action for Sexual Assault and Battery – Assault and battery are two separate causes of action in California. To this end, each cause of action should be separately stated, must be separately numbered, and must identify against whom it is asserted. (See Ca. Rule of Court 2.112). Plaintiff's failure to follow this rule makes these combined claims both subject to a motion to strike because they are "not drawn or filed in conformity with the laws of this state, a court rule, or an order of the court." (CCP § 436(b)).

II. Demurrer

Several of Plaintiff's causes of action against Mr. Fletcher are also subject to demurrer. In particular, California Code of Civil Procedure section 430.10 provides that a complaint may be subject to demurrer when it does not state facts sufficient to constitute a cause of action. (Ca. Code. Civ. Proc. § 431.10(e)). Here, Plaintiff's FEHA claims against Mr. Fletcher (i.e. Plaintiff's first, fourth, fifth, sixth, and seventh causes of action) fail to state a claim because Mr. Fletcher was not Plaintiff's employer, nor was he an employee of Defendant MTS. Given that Gov. Code § 12940 applies only "unlawful employment practices" perpetuated by "employers," Plaintiff's first, fourth, fifth, sixth, and seventh causes of action are inapplicable to Mr. Fletcher as a matter of law. They must be voluntarily dismissed.

III. Conclusion

In light of the foregoing, Plaintiff's First Amended Complaint is subject to both a demurrer and motion to strike, as detailed above. Please advise no later than the close of business on **Wednesday, August 9, 2023** as to whether Plaintiff will agree to voluntarily dismiss or amend the defects described herein, and to provide us with your availability for a phone call to discuss the same.

Thank you for your attention and please do not hesitate to contact me directly if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'Stephanie Reynolds', written in a cursive style.

Stephanie Reynolds
For FISHER & PHILLIPS LLP

SR:af

EXHIBIT C

January 8, 2024

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4747 Executive Drive, Suite 1000
San Diego, CA 92121

Re: *Figueroa v. Nathan Fletcher, et al.*
Case No.: 37-2023-00012828-CU-OE-CTL

Plaintiff's Response to Defendant Fletcher's Demand for Dismissal

Dear Counsel:

We are writing to provide a formal response to Defendant Nathan Fletcher's ("Fletcher") demand for dismissal dated January 3, 2024 (the "Demand"). The Demand, which was served after hours last week, provides a deadline of today for our office to dismiss Plaintiff Grecia Figueroa's ("Plaintiff" or "Ms. Figueroa") claims against Fletcher. Be advised that, for myriad reasons discussed herein, our office will *not* be dismissing any claim or party from the case at this time.

Upon reviewing the Demand, we were disappointed yet unsurprised by its oversimplified rendition of the facts. In material ways, your client and your firm appear to gravely misunderstand, or perhaps blatantly ignore, the nuance surrounding consent in sexual harassment/assault cases. Your error underscores much of why we cannot and will not dismiss any claim or party at this early stage of the case. Put simply, your Demand contains *improper* arguments that would be expected much later on in a motion for summary judgment. As a reminder of the status of this case, discovery is still ongoing and no depositions have taken place despite Plaintiff's efforts to schedule them. In fact, we are trapped in a vicious cycle of time-consuming and costly motion work because both defendants – particularly Fletcher – would rather bully Ms. Figueroa than let her speak.

Crucial to this case is the fact that survivors of sexual harassment/assault, like Ms. Figueroa, struggle to find the courage to tell their stories. They feel that they will be dismissed and called liars simply because the truth is at odds with what their perpetrators, like Fletcher, are willing to admit. This is why only about 12% of survivors come forward even though a staggering 81% of women nationwide report experiencing sexual harassment/assault in their lifetime.¹ Despite the characterization of Ms. Figueroa in your Demand, it should be noted that only about 2% of reports of sexual harassment/assault end up being false.² Therefore, just because Fletcher fancies himself a big deal does not mean that his word or his worth are more valid than Ms. Figueroa's word or worth. In fact, the conduct of your client, and indeed your firm, is plainly representative of all too many cases in the *#MeToo* Movement where men of power think that their influence, resources, and bravado can silence their victims. But this plague of "boys will be boys" is over.

As an observation about your firm's professionalism, it is clear by the slinging of mud at our client and our firm that ethics are conveniently elusive to you. The Pride Law Firm is well-respected for its advocacy of survivors of sexual harassment/assault and employees wronged by their employers. Our attorneys have nearly two decades of experience in these specific practice areas, and have tirelessly fought for justice for our clients. This case is no exception. However, rather than focus on the facts of this case, your firm took the time to research and cite two (2) unrelated and remote instances of sanctions relating to our firm in an attempt to paint Ms. Figueroa's claims as "deceptive." This is an unscrupulous folly. Perhaps we should take the time to further explore *your* firm's history of deceptive litigation tactics, which resulted in substantial sanctions and/or verdicts against you and your clients in the past.³ But what useful purpose would this serve?

Therefore, to refocus, this case is about Ms. Figueroa being wronged by Fletcher and her former employer, San Diego Metropolitan Transit System ("MTS"). This is *not* a case about the frail reputation of a cheating politician whose acts came to light at an inconvenient time in his career. Fletcher, a married man, admits that he engaged in sexual relations with Ms. Figueroa while she was employed by MTS.⁴ Although Fletcher was not Ms. Figueroa's direct supervisor, he was the Chairman of MTS' Board of Directors and carried a great deal of power and influence within the organization and within local government. Even setting aside the complex issue of consent relating to *each and every* act between Fletcher and Ms. Figueroa, we also allege that MTS knew about these sexual relations and, uncoincidentally, Ms. Figueroa was terminated the same day Fletcher announced his intent to run for public office. The potential involvement of Fletcher, and perhaps even his wife, California State Assemblywoman Lorena Gonzalez, is yet to be borne out. In sum, there are numerous factual issues that remain, and it is the job of the jury – *not* Fletcher or your firm – to determine the truth.

I. Unequal Power Dynamics Between Fletcher and Ms. Figueroa Led to Ms. Figueroa Feeling Unable to Turn Down Fletcher's Advances

A. The Complicated Psychology of Survivors Like Ms. Figueroa

At the outset, all parties must acknowledge that sexual harassment/assault cases are rarely black and white. The requirement of consent is complicated and multi-faceted, depending on a host of

factual circumstances, and often relying on witness testimonies and expert analyses. As such, the messages between Fletcher and Ms. Figueroa⁵ upon which your Demand *solely* relies cannot possibly be the deciding factor in determining whether *each and every* act or encounter was, in fact, consensual. Most glaringly, your firm hasn't bothered to even depose Ms. Figueroa to attempt to get her side of the story. One can only wonder why. But since you haven't inquired yourselves, we will illuminate you as to why it is so important to understand the psychology of survivors like Ms. Figueroa.

Survivors of sexual harassment/assault, when confronted with their perpetrator, experience a "fight or flight" reaction by the sympathetic nervous system based upon the perception or anticipation of harm.⁶ In recent decades, however, psychologists and neuroscientists have discovered a somewhat more nuanced response to sexual harassment/assault situations known as the "fawn" response.⁷ Unlike the traditional "fight or flight" dichotomy, the "fawn" response arises by "[m]any survivors describe[ing] that they 'went along with it,' perhaps as a way to get through it quickly or as a way to keep it from getting worse, which is *not* the same as providing consent."⁸ Put simply, survivors can sometimes "recall certain behaviors that may sound like normal, consensual, sexual acts, but that they resorted to these things because they felt that they had no other choice."⁹ It goes without saying that survivors of sexual harassment/assault feel a litany of emotions, from shame and humiliation to guilt and depression. The "fawning" response only exacerbates these emotions, making the survivor further doubt that they will be believed.¹⁰ Unfortunately, through your Demand, we see this phenomenon of misplaced disbelief in action.




Given these complexities, Ms. Figueroa fully intends to retain one or more experts to opine as to her psychological responses to Fletcher's unwanted sexual advances, as well as her ongoing emotional harm. Specifically, the conduct of the defendants herein has left Ms. Figueroa without meaningful work in her field, which is deeply demoralizing and economically troubling for her. Ms. Figueroa has also suffered and continues to suffer from fear, shame, humiliation, guilt, trouble sleeping, trust issues, depression, and anxiety. On at least one occasion, Ms. Figueroa contemplated suicide and was forced to speak with a suicide hotline.¹¹ To this end, the conduct of Fletcher and your firm throughout this case thus far has only made these symptoms worse.

B. Ms. Figueroa's Contemporaneous Communications with Friends Demonstrate that All or At Least Most of Fletcher's Advances Were Not Consented to by Ms. Figueroa

As you know, our offices have met and conferred extensively regarding initial written discovery. In response to your latest meet and confer letter dated December 27, 2023, and in the spirit of compromise and transparency, our office produced several sensitive documents (each marked confidential), even though the stipulated protective order is still pending with the Court. These documents were produced on January 5, 2024, which was the agreed upon date by the parties. These documents primarily consist of private communications Ms. Figueroa had with her close friends during the incidents with Fletcher.¹² A review of these private communications provides a more thorough picture of the situation and Ms. Figueroa's responses to trauma.

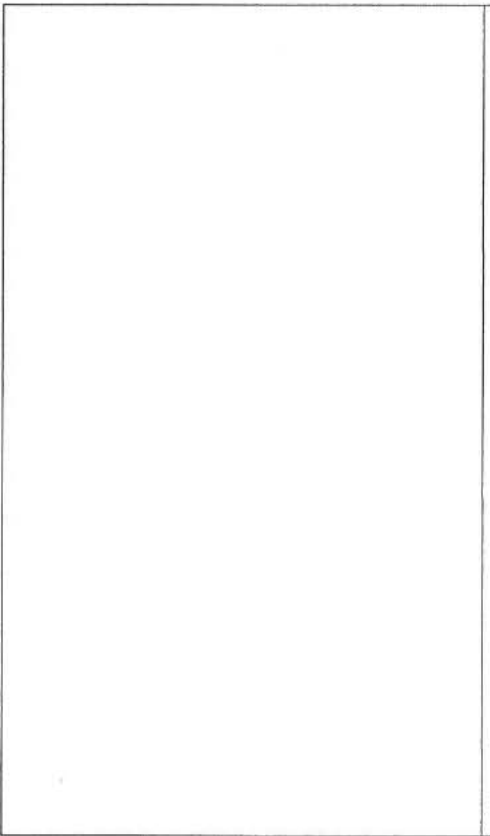
By way of example, the following communications are presented side-by-side to illustrate the complexity of Ms. Figueroa’s predicament and her lack of consent. In many instances, Ms. Figueroa expresses concern, fear, and apprehension about her work life with Fletcher around making advances at her.

Ms. Figueroa’s Messages with Fletcher and/or Fletcher’s Conduct	Ms. Figueroa’s Contemporaneous and/or Corresponding Messages with Friend(s)	Notes
<p>Grecia Figueroa Have a great day! Jan 19, 2023, 1:43 PM</p> <p>Nathan Fletcher Soon Jan 19, 2023, 1:42 PM</p> <p>Nathan Fletcher Gotta run: talk and hopefully see you SOI ❤️Grecia Figueroa Jan 19, 2023, 1:42 PM</p> <p>Nathan Fletcher 0:00 / 0:00 Jan 19, 2023, 1:42 PM</p> <p>Nathan Fletcher I won't keep it forever. Just a little change ❤️Grecia Figueroa Jan 19, 2023, 1:20 PM</p> <p>Grecia Figueroa It's different...I like beards... both look good! Jan 19, 2023, 1:20 PM</p> <p>Nathan Fletcher Makes me look old Jan 19, 2023, 1:18 PM</p> <p>Nathan Fletcher You like?</p>	<p style="text-align: right;">PLTFF088</p> <p style="text-align: center;">Redactions requested by Plaintiff, pursuant to pending protective order. Fletcher intends to challenge Plaintiff's confidentiality designation. See McKaveney Decl. 4</p>	<p>This Instagram conversation was initiated by Fletcher on January 19, 2023, at 1:02 p.m. during an MTS Zoom meeting. Redactions requested by Plaintiff, pursuant to pending protective order. Fletcher intends to challenge Plaintiff's confidentiality designation. See McKaveney Decl. 4</p>

<p> Grecia Figueroa  new look I see Jan 19, 2023, 1:14 PM</p> <p>Grecia Figueroa  Jan 19, 2023, 1:14 PM</p> <p>Grecia Figueroa Hi Jan 19, 2023, 1:14 PM</p> <p>Nathan Fletcher Hi Jan 19, 2023, 1:02 PM</p>		
	<p>Redactions requested by Plaintiff, pursuant to pending protective order. Fletcher intends to challenge Plaintiff's confidentiality designation. See McKaveney Decl. 4</p>	

	<p>Redactions requested by Plaintiff, pursuant to pending protective order. Fletcher intends to challenge Plaintiff's confidentiality designation. See McKaveney Decl. 4</p>
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<p>Nathan Fletcher Don't reply:) will see you in 2023!!! Dec 31, 2022, 6:12 PM</p> <p>Nathan Fletcher Happy new year mi amor. Here is to a 2023 where all are desires come true Dec 31, 2022, 6:06 PM</p> <p>Grecia Figueroa Happy birthday, campeón. Dec 31, 2022, 3:22 PM</p>	<p>Redactions requested by Plaintiff, pursuant to pending protective order. Fletcher intends to challenge Plaintiff's confidentiality designation. See McKaveney Decl. 4</p>	<p>In response to Ms. Figueroa's birthday message, Fletcher responds several hours later in a flirtatious manner. He refers to Ms. Figueroa as "mi amor," which is Spanish for "my love." Ms. Figueroa did not want to accept Fletcher's continued advances or pet names.</p> <p>Redactions requested by Plaintiff, pursuant to pending protective order. Fletcher intends to challenge Plaintiff's confidentiality designation. See McKaveney Decl. 4</p>
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Redactions requested by Plaintiff, pursuant to pending protective order. Fletcher intends to challenge Plaintiff's confidentiality designation. See McKaveney Decl. 4

	<p>Redactions requested by Plaintiff, pursuant to pending protective order. Fletcher intends to challenge Plaintiff's confidentiality designation. See McKaveney Decl. 4</p>

<p>Sep 12, 2022, 7:35 AM</p> <p>Nathan Fletcher You should have said hello!!! Sep 12, 2022, 7:35 AM</p> <p>Grecia Figueroa I was there today too. thanks for supporting our 9/11 heroes. Great speech. us Sep 10, 2022, 11:58 PM</p> <p>Nathan Fletcher Liked a message Sep 1, 2022, 10:18 AM</p> <p>Grecia Figueroa You tool ❤️Nathan Fletcher Sep 1, 2022, 10:15 AM</p> <p>Nathan Fletcher Hope you are well ❤️Grecia Figueroa Sep 1, 2022, 9:35 AM</p> <p>Nathan Fletcher Hi there Sep 1, 2022, 8:48 AM</p>	<p>Redactions requested by Plaintiff, pursuant to pending protective order. Fletcher intends to challenge Plaintiff's confidentiality designation. See McKaveney Decl. 4</p>
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	<p>Redactions requested by Plaintiff, pursuant to pending protective order. Fletcher intends to challenge Plaintiff's confidentiality designation. See McKaveney Decl. 4</p>

	Redactions requested by Plaintiff, pursuant to pending protective order. Fletcher intends to challenge Plaintiff's confidentiality designation. See McKaveney Decl. 4
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There are clear examples of “fawning” behavior on the part of Ms. Figueroa as she attempts to pacify Fletcher, while at the same time expressing to those close to her that she is uncomfortable with the situation. On multiple occasions, Ms. Figueroa indicates she is going to muster the courage to tell Fletcher to leave her alone. However, she is afraid of what might happen and afraid of anyone finding out. It is clear that Ms. Figueroa felt trapped and that she had no other choice than to play along with Fletcher; he was, after all, the Chairman of her employer, MTS.

Ultimately, Ms. Figueroa enjoyed her work at MTS; she has a passion for public relations and was hopeful for a long career with MTS. She was terrified that Fletcher might interfere with her career one way or another, or that MTS would find out about the encounters and terminate her. Turns out, her fears came true.

II. Fletcher’s Threatened Demurrer and/or Motion to Strike Improperly Seek to Resolve Factual Disputes in the Pleading Stage

Your Demand threatens the filing of a demurrer and/or motion to strike as to Plaintiff’s operative complaint, as well as vaguely threatening reporting of our firm to the State Bar. Both threats are misguided attempts to further bully Ms. Figueroa and her counsel. Not only that, but these threats illustrate a lack of good faith.

As to Fletcher's responsive pleading due January 22, 2024, we reiterate that a demurrer and/or motion to strike on the grounds set forth in your Demand would be inappropriate for a number of reasons. *First*, your arguments ignore the nuance of consent and fall into the trap of "blaming the victim" in the face of clearly "fawning" behavior. *Second*, your arguments broadly assert that all interactions between Fletcher and Ms. Figueroa were consensual, when, in fact, we would have to go through each and every encounter to assess consent individually and in light of the circumstances. *Third*, your arguments ignore the totality of the circumstances, including Ms. Figueroa's contemporaneous communications with close friends, the pressures of Ms. Figueroa's employment and how Fletcher could have (and likely did) easily influence it such that she was fired, and the total failure of your office to depose Ms. Figueroa to obtain her sworn testimony as to these matters.

Essentially, these arguments demonstrate your attempt to circumvent the Code of Civil Procedure by having a motion for summary judgment heard at the early pleading stage. We fervently disagree with this tactic and will continue to oppose any such attempts by your office to subject our client to further turmoil simply because you can. Your professionalism and adherence to established rules from here on out would be appreciated.

III. Sanctions Are Appropriate Against Fletcher and Your Firm for Repeated Abuses of the Litigation Process

Despite what mistruths the Demand touts, our office has done nothing but zealously advocate for our client. For example, the Demand claims that we "were aware . . . that [Ms. Figueroa] was a consensual participant in her encounters with Mr. Fletcher." This is preposterous. First of all, no one other than Ms. Figueroa herself could possibly know this for sure since she alone held the power of consent. Moreover, we understand given our extensive experience in this area that the totality of the circumstances must be assessed to properly determine consent as to each encounter. As we have explained herein, your Demand fails to consider other factors aside from the messages between Fletcher and Ms. Figueroa. However, they don't tell the whole story.

Your Demand also suggests that our office intentionally, and without good cause, withheld "exonerating" documents from Fletcher. The "exonerating" documents we assume you refer to are the message between Fletcher and Ms. Figueroa – messages that Fletcher should himself have access to as he was a participant. Not only that, but the parties had not yet agreed upon the terms of a stipulated protective order, which meant that any sensitive documents could not be produced yet. Ultimately, these documents, and even further documents, were produced despite the stipulated protective order still being pending. We have attempted to protect our client's Constitutionally protected privacy rights to the extent possible, while also complying with our discovery obligations.

Your office, however, has *not* acted in good faith. For example, all sets of written discovery propounded upon Fletcher have been deficient (as per our meet and confer correspondences dated September 7, 2023 and December 20, 2023), and yet your office refuses to provide supplementation. If this trend continues, we will have no choice but to move to compel Code-

compliant responses. In addition, your office has needlessly propagated motion practice at the expense of all parties and the Court's time, including frivolous motions to strike and utilizing basic (and televised) status conferences as a platform to manipulate the narrative of the case. This is all no coincidence. It is a blatant attempt to shame a survivor, Ms. Figueroa, to try to save Fletcher's reputation. However, Ms. Figueroa didn't destroy Fletcher's reputation – he did that himself through infidelity, recklessness, and alcohol abuse.

Given the foregoing, and should the abuses of the litigation process continue, Plaintiff will seek all appropriate remedies available to her, including a request for monetary sanctions against Fletcher and his attorneys at Fisher Phillips, including Danielle Moore, Stephanie Reynolds, Sean McKaveney, and Keia Atkinson.

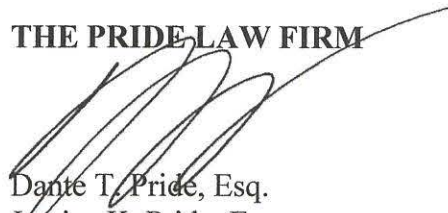
IV. Next Steps

For the foregoing reasons, Plaintiff cannot and will not dismiss any claim or party from the case at this time. Quite simply, there are too many unresolved factual disputes that the parties must contend with, including the totality of the circumstances surrounding each and every sexual encounter between Fletcher and Ms. Figueroa. To this end, Ms. Figueroa will continue to engage in the discovery process to prove her claims, including re-noticing the depositions of Fletcher, Lorena Gonzalez, and other percipient witnesses.

In light of all this, we encourage you to meet and confer further with our office. Again, the goal is not to needlessly engage in motion practice. If, however, your office proceeds with its frivolous motion(s), or should your evasiveness with discovery persist, we will have no choice but to seek all available remedies, including monetary sanctions. The abuses of our client and the litigation process must stop.

Sincerely,

THE PRIDE LAW FIRM



Dante T. Pride, Esq.
Jessica K. Pride, Esq.
Zachary Freire-Aviña, Esq.

JP/ZFA:sw

¹ *Statistics About Sexual Violence* (2015) National Sexual Violence Resource Center <https://www.nsvrc.org/sites/default/files/publications_nsvrc_factsheet_media-packet_statistics-about-sexual-violence_0.pdf> (as of January 8, 2024); *Statistics* (2023) National Sexual Violence Resource Center <<https://www.nsvrc.org/statistics>> (as of January 8, 2024).

² See id.

³ See, e.g., Kloczko, Justin, *Appeals Court Sanctions Arent Fox, Fisher Phillips \$40K* (May 29, 2020) Daily Journal <<https://ggtriallaw.com/Articles/DJ-Arent-Fox-Fisher-Phillips-Sanctioned-%2440K-Forum-Shopping-Frivolous-Appeal.pdf>> (as of January 8, 2024); see also, e.g., Umanah, Ufonobong, *Fisher Phillips Lawyers Must Learn of Colleagues' Reprimand* (May 5, 2023) Bloomberg News <<https://news.bloomberglaw.com/litigation/fisher-phillips-lawyers-must-be-told-of-colleagues-reprimand>> (as of January 8, 2024).

⁴ See, e.g., Defendant Fletcher's verified Responses to Plaintiff's Request for Admission, Set Two (2), Nos. 25-28, 30-31, 38 [*note*: objections were waived due to untimely responses].

⁵ See Plaintiff Bate Nos. "Pltf Comm_00001 – 00120."

⁶ See Sullivan, Rachel, LCSW, *Another Response to Trauma: Fawning* (Oct. 22, 2022) <<https://www.belongly.com/another-response-to-trauma-fawning/>> (as of January 8, 2024).

⁷ See id.

⁸ See id. [emphasis added].

⁹ See id.

¹⁰ See id. ["Unfortunately, this specific type of response can too easily be manipulated into victim-blaming. In a society that already looks to blame the victim for sexual violence ('what was she wearing?', 'was there drinking involved?'), 'talking dirty' to a rapist fits too well into the same damaging and stigmatizing narrative. But, if I beg for mercy and give all my possessions in exchange for my life to the hypothetical gun-wielding perpetrator, does that imply that I consented to be held at gunpoint?"].

¹¹ See Plaintiff Bate Nos. "PLTFF111 – 112."

¹² See Plaintiff's Bate Nos. "PLTFF54 – 99."

EXHIBIT D

From: [Brown, Janice](#)
To: [Dante Pride](#)
Cc: [Zachary Freire-Aviña](#); [Stef White](#); [Whitaker, Lisa](#); [Jessica Pride](#); [Alfred Von Kessler](#); [Arla Clark](#); [Bermudez, Nadia P.](#); [Russell, Kelsie](#); [Phillip, Corrin](#); [Williams, Evangeline](#); [Malavar, Jordan](#); [Brandt-Guerra, Julia](#); [McGee, Faith Ann](#); [Moore, Danielle](#); [Reynolds, Stephanie](#); [McKaveney, Sean](#); [Atkinson, Keia](#); [West, Courtney](#); [Funkhouser, Amanda](#); [Hickman, Zilia](#); [Jackson, Susan](#); [Zekan, Karen](#); [Clipper, Monica](#)
Subject: Re: Figueroa v. Nathan Fletcher, MTS -- Depositions
Date: Tuesday, January 9, 2024 5:32:02 PM

Please send two days for your client's deposition dates as well. I think we will have an opportunity to sort out these times, as we have a case management conference on the 19th.

And, I misunderstood - it seemed as if you were taking all of the depositions. Janice

From: "Dante Pride" <dpride@pridelawfirm.com>
Subject: Figueroa v. Nathan Fletcher, MTS -- Depositions
Date: 09 January 2024 17:25
To: "Brown, Janice" <jbrown@meyersnave.com>
Cc: "Zachary Freire-Aviña" <zfa@pridelawfirm.com>, "Stef White" <swhite@pridelawfirm.com>, "Whitaker, Lisa" <lwhitaker@fisherphillips.com>, "Jessica Pride" <jpride@pridelawfirm.com>, "Alfred Von Kessler" <AVK@pridelawfirm.com>, "Arla Clark" <aclark@pridelawfirm.com>, "Bermudez, Nadia P." <nbermudez@meyersnave.com>, "Russell, Kelsie" <krussell@meyersnave.com>, "Phillip, Corrin" <cphillip@meyersnave.com>, "Williams, Evangeline" <ewilliams@meyersnave.com>, "Malavar, Jordan" <jmalavar@meyersnave.com>, "Brandt-Guerra, Julia" <jbrandt-guerra@meyersnave.com>, "McGee, Faith Ann" <fmcgee@meyersnave.com>, "Moore, Danielle" <dmoore@fisherphillips.com>, "Reynolds, Stephanie" <sreynolds@fisherphillips.com>, "McKaveney, Sean" <smckaveney@fisherphillips.com>, "Atkinson, Keia" <katkinson@fisherphillips.com>, "West, Courtney" <cwest@fisherphillips.com>, "Funkhouser, Amanda" <afunkhouser@fisherphillips.com>, "Hickman, Zilia" <zhickman@fisherphillips.com>, "Jackson, Susan" <sjackson@fisherphillips.com>, "Zekan, Karen" <kzekan@fisherphillips.com>, "Clipper, Monica" <mclipper@fisherphillips.com>

Hi Janice,

I can make provisions for an attorney present - even if I have to cancel a pre-planned vacation - in order to get these depositions handled. Dates of availability are February 1, 2024 - March 31, 2024; all-inclusive. If you'd like to do it on a weekend, please confirm those dates before you write them in ink. Otherwise, and as previously mentioned, please provide at least one date for each client and we will send notice. Thank you and happy we were able to work this out.

Regards,

Dante T. Pride, Esq.
THE PRIDE LAW FIRM
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[Suite 104](#)
[San Diego, CA 92108](#)
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On Jan 9, 2024, at 4:52 PM, Brown, Janice <jbrown@meyersnave.com> wrote:

Dante,

I asked you to select dates. You mentioned dates in February and March, but as I shared your case management conference report indicates otherwise. So, please clarify. Janice

From: Dante Pride <dpride@pridelawfirm.com>

Sent: Tuesday, January 9, 2024 4:47 PM

To: Brown, Janice <jbrown@meyersnave.com>

Cc: Zachary Freire-Aviña <zfa@pridelawfirm.com>; Stef White <swhite@pridelawfirm.com>; Whitaker, Lisa <lwhitaker@fisherphillips.com>; Jessica Pride <jpride@pridelawfirm.com>; Alfred Von Kessler <AVK@pridelawfirm.com>; Arla Clark <aclark@pridelawfirm.com>; Bermudez, Nadia P. <nbermudez@meyersnave.com>; Russell, Kelsie <krussell@meyersnave.com>; Phillip, Corrin <cphillip@meyersnave.com>; Williams, Evangeline <ewilliams@meyersnave.com>; Malavar, Jordan <jmalavar@meyersnave.com>; Brandt-Guerra, Julia <jbrandt-guerra@meyersnave.com>; McGee, Faith Ann <fmcgee@meyersnave.com>; Moore, Danielle <dmoore@fisherphillips.com>; Reynolds, Stephanie <sreynolds@fisherphillips.com>; McKaveney, Sean <smckaveney@fisherphillips.com>; Atkinson, Keia <katkinson@fisherphillips.com>; West, Courtney <cwest@fisherphillips.com>; Funkhouser, Amanda <afunkhouser@fisherphillips.com>; Hickman, Zilia <zhickman@fisherphillips.com>; Jackson, Susan <sjackson@fisherphillips.com>; Zekan, Karen <kzekan@fisherphillips.com>; Clipper, Monica <mclipper@fisherphillips.com>

Subject: Re: Figueroa v. Nathan Fletcher, MTS -- Depositions

Janice,

Stef will call your staff to verify that your office has the entirety of the service documents. Again, my apologies and it will not happen again.

I look forward to receiving available dates for the individuals mentioned below. Is there a specific date you'd like for my client? If so, I will ask if she is available that date. If not, I will get some potential dates and circle back. Thank you.

Regards,

Dante T. Pride, Esq.

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On Jan 9, 2024, at 4:28 PM, Brown, Janice <jbrown@meyersnave.com> wrote:

Those dates are inconsistent with your case management report, If you are open to ignore those dates, we can proceed. In that vein - what dates is your client available? Thanks, Janice

PS - could you have someone from your staff call me or my staff to make certain that we've received all documents. As I shared, this is not a one time occurrence.

From: "Dante Pride" <dpride@pridelawfirm.com>

Subject: Figueroa v. Nathan Fletcher, MTS -- Depositions

Date: 09 January 2024 16:16

To: "Brown, Janice" <jbrown@meyersnave.com>

Cc: "Zachary Freire-Aviña" <zfa@pridelawfirm.com>, "Stef White" <swhite@pridelawfirm.com>, "Whitaker, Lisa" <lwhitaker@fisherphillips.com>, "Jessica Pride" <jpride@pridelawfirm.com>, "Alfred Von Kessler"

<AVK@pridelawfirm.com>, "Arla Clark" <aclark@pridelawfirm.com>, "Bermudez, Nadia P." <nbermudez@meyersnave.com>, "Russell, Kelsie" <krussell@meyersnave.com>, "Phillip, Corrin" <cphillip@meyersnave.com>, "Williams, Evangeline" <ewilliams@meyersnave.com>, "Malavar, Jordan" <jmalavar@meyersnave.com>, "Brandt-Guerra, Julia" <jbrandt-guerra@meyersnave.com>, "McGee, Faith Ann" <fmcgee@meyersnave.com>, "Moore, Danielle" <dmoore@fisherphillips.com>, "Reynolds, Stephanie" <sreynolds@fisherphillips.com>, "McKaveney, Sean" <smckaveney@fisherphillips.com>, "Atkinson, Keia" <katkinson@fisherphillips.com>, "West, Courtney" <cwest@fisherphillips.com>, "Funkhouser, Amanda" <afunkhouser@fisherphillips.com>, "Hickman, Zilia" <zhickman@fisherphillips.com>, "Jackson, Susan" <sjackson@fisherphillips.com>, "Zekan, Karen" <kzekan@fisherphillips.com>, "Clipper, Monica" <mclipper@fisherphillips.com>

Hi Janice,

My apologies for your office not being served. I assure you that was an oversight and I will personally endeavor for that not happen again.

As to dates, my office can be available for deposition on any date in February or March. With that open of a canvas, I'm confident you can find some dates. Please let me know what you come up with. Thank you, chat soon.

Regards,

Dante T. Pride, Esq.

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[San Diego, CA 92108](#)

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On Jan 9, 2024, at 4:03 PM, Brown, Janice <jbrown@meyersnave.com> wrote:

Dante,

One thing that I want to bring to your attention is that your firm continues to fail to produce documents to our firm that you serve on Mr. Fletcher's. So, far this is at least the second or third time that we have learned that you have produced documents to Mr. Fletcher's counsel but have failed to provide them to Meyers Nave. If you change your mind about having a reasonable meet and confer conference, I would appreciate it if we could just assure that you have properly served us with all of the documents, as we have missed at least two (maybe three) such productions. I am certain that it is unintentional and an oversight, but we would like to get that remedied.

As to the balance of your email, I must admit that I don't understand much of what you are trying to communicate. To be clear, our goal is to have a civil meet and confer conference so that we do not overlap on dates (for example, your case management conference report lists a number of vacations among other absences that we will respect). Our clients also have personal and work commitments that we will need to work around. In my view, a telephone call to meet and confer would be the most efficient approach. If not, then we may be compelled to file motions with these emails attached. I sincerely hope not. I am unable to predict what any Judge will do, but this Judge does appear to require adequate meet and confer. Other than a conference call early on in this case, I have not interacted with you on any other aspect of this case. If you are disquieted by the thought of a meet and confer conference with me, please provide some deposition dates that you are available in February and March and we will confirm with our clients, who remain employed at MTS. Let us know what works for you, as it seems that your calendar is busier than ours. Thank you, Janice Brown

Janice P. Brown

Principal

[<image007.png>](#)

[email](#) [bio](#) [website](#)

phone: 619.330.1703 mobile: 619.838.1703

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From: Dante Pride <dpride@pridelawfirm.com>

Sent: Tuesday, January 9, 2024 1:01 PM

To: Brown, Janice <jbrown@meyersnave.com>; Zachary Freire-Aviña <zfa@pridelawfirm.com>; Stef White <swhite@pridelawfirm.com>; Whitaker, Lisa <lwhitaker@fisherphillips.com>; Jessica Pride <jpride@pridelawfirm.com>; Alfred Von Kessler <AVK@pridelawfirm.com>; Arla Clark <aclark@pridelawfirm.com>; Bermudez, Nadia P. <nbermudez@meyersnave.com>; Russell, Kelsie <krussell@meyersnave.com>; Phillip, Corrin <cphillip@meyersnave.com>; Williams, Evangeline <ewilliams@meyersnave.com>; Malavar, Jordan <jmalavar@meyersnave.com>; Brandt-Guerra, Julia <jbrandt-guerra@meyersnave.com>; McGee, Faith Ann <fmcgee@meyersnave.com>

Cc: Moore, Danielle <dmoore@fisherphillips.com>; Reynolds, Stephanie <sreynolds@fisherphillips.com>; McKaveney, Sean <smckaveney@fisherphillips.com>; Atkinson, Keia <katkinson@fisherphillips.com>; West, Courtney <cwest@fisherphillips.com>; Funkhouser, Amanda <afunkhouser@fisherphillips.com>; Hickman, Zilia <zhickman@fisherphillips.com>; Jackson, Susan <sjackson@fisherphillips.com>; Zekan, Karen <kzekan@fisherphillips.com>; Clipper, Monica <mclipper@fisherphillips.com>

Subject: RE: Figueroa v. Nathan Fletcher, MTS -- Depositions

Janice,

We brought up depositions months ago. This is just me revisiting now that we've had multiple rounds of discovery, motion practice, tv reporting, etc. You or your clients' commitments are not of a general concern to me. If there are specific dates you or your clients aren't available, then please, don't offer those dates. But a general: "I just don't want to provide any dates until we have a phone conversation" is not how this works. Per the Code, I have the right to notice depositions when I see fit; not when you see fit. I am trying to work with you on dates, but you are flat out refusing to provide them. I will ask once more so that there is absolutely no confusion with our motions relating to the depositions:

Does MTS still employ Jeff Stumbo and Mark Olsen? If so, I would like deposition dates in February or March. Please provide available dates by Monday of next week. If you are unwilling to provide dates of availability for deposition, we will be forced to set unilaterally. We would like not to have to do that and we would also like to avoid motion practice as it relates to our right to conduct discovery/depositions.

So you see Janice, if my office sets dates unilaterally it will be because you forced me to do so by failing to respond to a simple inquiry about availability. Now if you are telling me that NONE of your clients are or will be available for deposition anytime in either February or March, that is a different statement and we can deal with that in turn. But without more information from you, I have to assume that you are just refusing to cooperate in discovery.

Mr. McKaveney,

I would also like dates of availability for deposition for unemployed Defendant Nathan Fletcher and his wife Lorena. Do you intend to represent Lorena in her deposition, or should I subpoena her directly? I would prefer dates in February, but will take dates in March if no February dates are available. Please provide said availability by Monday. Also, please let me know if you also intend to refuse to provide deposition availability for your clients. Thanks.

Regards,

<image001.png>

Dante T. Pride
Founding Partner

<image002.png>

dpride@pridelawfirm.com
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F: (619) 785-3414
[2831 Camino Del Rio South, Ste 104](#)
[San Diego, CA 92108](#)

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[<image003.png>](#) [<image004.png>](#) [<image005.png>](#) [<image006.png>](#)

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From: Brown, Janice <jbrown@meyersnave.com>
Sent: Tuesday, January 9, 2024 12:05 PM
To: Dante Pride <dpride@pridelawfirm.com>; Zachary Freire-Aviña <zfa@pridelawfirm.com>; Stef White <swhite@pridelawfirm.com>; Whitaker, Lisa <lwhitaker@fisherphillips.com>; Jessica Pride <jpride@pridelawfirm.com>; Alfred Von Kessler <AVK@pridelawfirm.com>; Arla Clark <aclark@pridelawfirm.com>; Bermudez, Nadia P. <nbermudez@meyersnave.com>; Russell, Kelsie <krussell@meyersnave.com>; Phillip, Corrin <cphillip@meyersnave.com>; Williams, Evangeline <ewilliams@meyersnave.com>; Malavar, Jordan <jmalavar@meyersnave.com>; Brandt-Guerra, Julia <jbrandt-guerra@meyersnave.com>; McGee, Faith Ann <fmcgee@meyersnave.com>
Cc: Moore, Danielle <dmoore@fisherphillips.com>; Reynolds, Stephanie <sreynolds@fisherphillips.com>; McKaveney, Sean <smckaveney@fisherphillips.com>; Atkinson, Keia <katkinson@fisherphillips.com>; West, Courtney <cwest@fisherphillips.com>; Funkhouser, Amanda <afunkhouser@fisherphillips.com>; Hickman, Zilia <zhickman@fisherphillips.com>; Jackson, Susan <sjackson@fisherphillips.com>; Zekan, Karen <kzekan@fisherphillips.com>; Clipper, Monica <mclipper@fisherphillips.com>
Subject: RE: Figueroa v. Nathan Fletcher, MTS -- Depositions

Dante,

Your email below is why I sought to have a conversation. Given the record in this case, I highly recommend that we have a conversation before you decide to unilaterally set depositions. You have no idea about my commitments or the commitments of my clients and this short window you are providing isn't respectful, considering we just got an operative complaint late last year. All I can do is ask, if you'd rather move forward without consideration of my or my clients' obligations, so be it. Regards, Janice

Janice P. Brown
Principal
[<image007.png>](#)

[email](#) [bio](#) [website](#)
phone: 619.330.1703 mobile: 619.838.1703
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From: Dante Pride <dpride@pridelawfirm.com>
Sent: Tuesday, January 9, 2024 10:43 AM
To: Brown, Janice <jbrown@meyersnave.com>; Zachary Freire-Aviña <zfa@pridelawfirm.com>; Stef White <swhite@pridelawfirm.com>; Whitaker, Lisa <lwhitaker@fisherphillips.com>; Jessica Pride <jpride@pridelawfirm.com>; Alfred Von Kessler <AVK@pridelawfirm.com>; Arla Clark <aclark@pridelawfirm.com>; Bermudez, Nadia P. <nbermudez@meyersnave.com>; Russell, Kelsie <krussell@meyersnave.com>; Phillip, Corrin <cphillip@meyersnave.com>; Williams, Evangeline <ewilliams@meyersnave.com>; Malavar, Jordan <jmalavar@meyersnave.com>; Brandt-Guerra, Julia <jbrandt-guerra@meyersnave.com>; McGee, Faith Ann <fmcgee@meyersnave.com>
Cc: Moore, Danielle <dmoore@fisherphillips.com>; Reynolds, Stephanie <sreynolds@fisherphillips.com>; McKaveney, Sean <smckaveney@fisherphillips.com>; Atkinson, Keia <katkinson@fisherphillips.com>; West, Courtney <cwest@fisherphillips.com>; Funkhouser, Amanda <afunkhouser@fisherphillips.com>; Hickman, Zilia <zhickman@fisherphillips.com>; Jackson, Susan <sjackson@fisherphillips.com>; Zekan, Karen <kzekan@fisherphillips.com>; Clipper, Monica <mclipper@fisherphillips.com>
Subject: RE: Figueroa v. Nathan Fletcher, MTS -- Depositions

Hi Janice,

Thank you for your email. I am not certain if my last email was unclear. Perhaps I can clarify:

I am not interested in any further meet and confer efforts. We do not intend to dismiss this case. If you think you have grounds for such, write the motion.

Please provide deposition dates or we will unilaterally set on Monday, January 15, 2024. Once set, **we will not take them off calendar** until the judge makes a determination on your non-appearance and our motion to compel. We have a right to run our case and move forward how we see fit. We have given you an entire week to get possible **future** dates for deposition availability. Anything short of you providing dates to us is gamesmanship. Perhaps prior to defense's attempts to paint my firm as inept, or myself as unscrupulous, I may have been more open to some further meet and confer. But in light of Defendants' tactics, I'm content moving forward with litigation. So again, please provide dates or we will set them unilaterally. Thanks.

Regards,

<image008.png>

Dante T. Pride
Founding Partner

<image009.png>

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[<image010.png>](#) [<image011.png>](#) [<image012.png>](#) [<image013.png>](#)

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From: Brown, Janice <jbrown@meyersnave.com>

Sent: Tuesday, January 9, 2024 9:50 AM

To: Dante Pride <dpride@pridelawfirm.com>; Zachary Freire-Aviña <zfa@pridelawfirm.com>; Stef White <swhite@pridelawfirm.com>; Whitaker, Lisa <whitaker@fisherphillips.com>; Jessica Pride <jpride@pridelawfirm.com>; Alfred Von Kessler <AVK@pridelawfirm.com>; Arla Clark <aclark@pridelawfirm.com>; Bermudez, Nadia P. <nbermudez@meyersnave.com>; Russell, Kelsie <krussell@meyersnave.com>; Phillip, Corrin <cphillip@meyersnave.com>; Williams, Evangeline <ewilliams@meyersnave.com>; Malavar, Jordan <jmalavar@meyersnave.com>; Brandt-Guerra, Julia <jbrandt-guerra@meyersnave.com>; McGee, Faith Ann <fmcgee@meyersnave.com>

Cc: Moore, Danielle <dmoore@fisherphillips.com>; Reynolds, Stephanie <sreynolds@fisherphillips.com>; McKaveney, Sean <smckaveney@fisherphillips.com>; Atkinson, Keia <katkinson@fisherphillips.com>; West, Courtney <cwest@fisherphillips.com>; Funkhouser, Amanda <afunkhouser@fisherphillips.com>; Hickman, Zilia <zhickman@fisherphillips.com>; Jackson, Susan <sjackson@fisherphillips.com>; Zekan, Karen <kzekan@fisherphillips.com>; Clipper, Monica <mclipper@fisherphillips.com>

Subject: RE: Figueroa v. Nathan Fletcher, MTS -- Depositions

Dante,

Thank you for your email.

I don't want to restate the obvious, but we should meet and confer, because I have an absolute different view of this case than you do. I had the chance to read your response to Mr. Fletcher's lawyers' letter and respectfully, I found it disappointing and frankly, unrealistic. I honestly believe that we should discuss this case and our respective next steps. Rather than add more to this email, I do invite you to share a time to discuss this case with our office. Regards, Janice Brown

Janice P. Brown
Principal

<image023.png>

[<image007.png>](#)

[email](#) [bio](#) [website](#)

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From: Dante Pride <dpride@pridelawfirm.com>

Sent: Tuesday, January 9, 2024 8:42 AM

To: Brown, Janice <jbrown@meyersnave.com>; Zachary Freire-Aviña <zfa@pridelawfirm.com>; Stef White <swhite@pridelawfirm.com>; Whitaker, Lisa <lwhitaker@fisherphillips.com>; Jessica Pride <jpride@pridelawfirm.com>; Alfred Von Kessler <AVK@pridelawfirm.com>; Arla Clark <aclark@pridelawfirm.com>; Bermudez, Nadia P. <nbermudez@meyersnave.com>; Russell, Kelsie <krussell@meyersnave.com>; Phillip, Corrin <cphillip@meyersnave.com>; Williams, Evangeline <ewilliams@meyersnave.com>; Malavar, Jordan <jmalavar@meyersnave.com>; Brandt-Guerra, Julia <jbrandt-guerra@meyersnave.com>; McGee, Faith Ann <fmcgee@meyersnave.com>

Cc: Moore, Danielle <dmoore@fisherphillips.com>; Reynolds, Stephanie <sreynolds@fisherphillips.com>; McKaveney, Sean <smckaveney@fisherphillips.com>; Atkinson, Keia <katkinson@fisherphillips.com>; West, Courtney <cwest@fisherphillips.com>; Funkhouser, Amanda <afunkhouser@fisherphillips.com>; Hickman, Zilia <zhickman@fisherphillips.com>; Jackson, Susan <sjackson@fisherphillips.com>; Zekan, Karen <kzekan@fisherphillips.com>; Clipper, Monica <mclipper@fisherphillips.com>

Subject: RE: Figueroa v. Nathan Fletcher, MTS -- Depositions

Hi Janice,

I'll be coming in to assist on this matter. I was busy with another matter that just resolved, so I had to do a little reading to catch up. I'm up to speed with all pleadings and correspondence. I appreciate your effort to further meet and confer, but I see no point in belaboring the issue. We'd like to get started on depositions. Please either provide dates or a statement that you will be refusing to provide dates so that we can move forward. At this point we have given you ample time to confer with your client to obtain dates (by Jan. 15). Thanks and hope to hear from you soon.

Regards,

[<image014.png>](#)

Dante T. Pride
Founding Partner

[<image015.png>](#)

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From: Brown, Janice <jbrown@meyersnave.com>
Sent: Monday, January 8, 2024 5:30 PM
To: Zachary Freire-Aviña <zfa@pridelawfirm.com>; Stef White <swhite@pridelawfirm.com>; Whitaker, Lisa <lwhitaker@fisherphillips.com>; Jessica Pride <jpride@pridelawfirm.com>; Dante Pride <dpride@pridelawfirm.com>; Alfred Von Kessler <AVK@pridelawfirm.com>; Arla Clark <aclark@pridelawfirm.com>; Bermudez, Nadia P. <nbermudez@meyersnave.com>; Russell, Kelsie <krussell@meyersnave.com>; Phillip, Corrin <cphillip@meyersnave.com>; Williams, Evangeline <ewilliams@meyersnave.com>; Malavar, Jordan <jmalavar@meyersnave.com>; Brandt-Guerra, Julia <jbrandt-guerra@meyersnave.com>; McGee, Faith Ann <fmcgee@meyersnave.com>
Cc: Moore, Danielle <dmoore@fisherphillips.com>; Reynolds, Stephanie <sreynolds@fisherphillips.com>; McKaveney, Sean <smckaveney@fisherphillips.com>; Atkinson, Keia <katkinson@fisherphillips.com>; West, Courtney <cwest@fisherphillips.com>; Funkhouser, Amanda <afunkhouser@fisherphillips.com>; Hickman, Zilia <zhickman@fisherphillips.com>; Jackson, Susan <sjackson@fisherphillips.com>; Zekan, Karen <kzekan@fisherphillips.com>; Clipper, Monica <mclipper@fisherphillips.com>
Subject: RE: Figueroa v. Nathan Fletcher, MTS -- Depositions

Counsel,

While I appreciate your desire to “get depositions” scheduled, I strongly recommend that we have a meet and confer conference about the entire case, based on recent communications. I do need to review your emails today as to your response to the comprehensive letter provided by Mr. Fletcher’s counsel. Let me know if we collectively can meet and confer before we agree to anything given the current posture of the case. I recommend either Wednesday of this week or Monday the 15th. Setting depositions unilaterally or via email isn’t the most effective approach, in my view. So please advise whether either of the recommended dates work for everyone. Thanks, Janice Brown

Janice P. Brown

Principal

<image023.png>

[<image007.png>](#)

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From: Zachary Freire-Aviña <zfa@pridelawfirm.com>

Sent: Monday, January 8, 2024 4:59 PM

To: Stef White <swhite@pridelawfirm.com>; Whitaker, Lisa <lwhitaker@fisherphillips.com>; Jessica Pride <jpride@pridelawfirm.com>; Dante Pride <dpride@pridelawfirm.com>; Alfred Von Kessler <AVK@pridelawfirm.com>; Arla Clark <aclark@pridelawfirm.com>; Brown, Janice <jbrown@meyersnave.com>; Bermudez, Nadia P. <nbermudez@meyersnave.com>; Russell, Kelsie <krussell@meyersnave.com>; Phillip, Corrin <cphillip@meyersnave.com>; Williams, Evangeline <ewilliams@meyersnave.com>; Malavar, Jordan <jmalavar@meyersnave.com>; Brandt-Guerra, Julia <jbrandt-guerra@meyersnave.com>; McGee, Faith Ann <fmcgee@meyersnave.com>

Cc: Moore, Danielle <dmoore@fisherphillips.com>; Reynolds, Stephanie <sreynolds@fisherphillips.com>; McKaveney, Sean <smckaveney@fisherphillips.com>; Atkinson, Keia <katkinson@fisherphillips.com>; West, Courtney <cwest@fisherphillips.com>; Funkhouser, Amanda <afunkhouser@fisherphillips.com>; Hickman, Zilia <zhickman@fisherphillips.com>; Jackson, Susan <sjackson@fisherphillips.com>; Zekan, Karen <kzekan@fisherphillips.com>; Clipper, Monica <mclipper@fisherphillips.com>

Subject: Figueroa v. Nathan Fletcher, MTS -- Depositions

[EXTERNAL E-MAIL]

Good afternoon, all:

Happy New Year! We hope you all had great holidays.

With the start of the new year, we need to get depositions scheduled and back on track to get the case moving.

Fletcher folks – please provide availability for Nathan Fletcher and Lorena Gonzalez for February or March 2024. If we do not hear back by Monday, January 15, 2024, we will have to unilaterally set these depositions. We appreciate your cooperation.

MTS folks – please confirm whether Jeff Stumbo and Mark Olsen are still employed with MTS. If so, please provide their availability for February or March 2024. If we do not hear back by Monday, January

15, 2024, we will have to unilaterally set these depositions. In addition, we will be circulating a PMK deposition notice shortly relating to MTS' employment policies and procedures; we will work with you to get the appropriate individual(s) scheduled. We appreciate your cooperation as well.

Thank you,
Zach

<image020.jpg>

Zachary Freire-Aviña
Senior Associate

<image021.jpg>

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**PROOF OF SERVICE
(CCP §§1013(a) and 2015.5)**

I, the undersigned, am at least 18 years old and not a party to this action. I am employed in the County of San Diego with the law offices of Fisher & Phillips LLP and its business address is 4747 Executive Drive, Suite 1000, San Diego, California, 92121.

On January 11, 2024, I served the following document(s) **DECLARATION OF SEAN L. MCKAVENEY IN SUPPORT OF DEFENDANT NATHAN FLETCHER’S MOTION TO STRIKE PLAINTIFF’S SECOND AMENDED COMPLAINT** on the person(s) listed below by placing *the original* *a true copy* thereof enclosed in sealed envelope(s) addressed as follows:

<p><i>E-Service Per C.C.P. §1010.6 (Eff. 01/01/23)</i> Jessica K. Pride (SBN 249212) Dante T. Pride (SBN 262362) Zachary Freire-Aviña (SBN 325460) Alfred Von Kessler IV (SBN 309453) THE PRIDE LAW FIRM 2831 Camino del Rio South, Suite 104 San Diego, California 92108</p>	<p>Telephone: (619)516-8166 Facsimile: (619)785-3414 E-Mail: jpride@pridelawfirm.com; dpride@pridelawfirm.com; zfa@pridelawfirm.com; avk@pridelawfirm.com; swhite@pridelawfirm.com; aclark@pridelawfirm.com; Counsel for Plaintiff, Grecia Figueroa</p>
<p><i>E-Service Per C.C.P. §1010.6 (Eff. 01/01/23)</i> Janice P. Brown (SBN 114433) Nadia P. Bermudez (SBN 216555) Kelsie E. Russell (SBN 346629) MEYERS NAVE RIBACK SILVER & WILSON 600 “B” Street, Suite 1650 San Diego, California 92101</p>	<p>Telephone: (619)330-1700 Facsimile: (619)330-1701 E-Mail: jbrown@meyersnave.com; nbermudez@meyersnave.com; cphillip@meyersnave.com krussell@meyersnave.com; ewilliams@meyersnave.com; fmcgee@meyersnave.com jmalavar@meyersnave.com; jbrandt-guerra@meyersnave.com Counsel for San Diego Metropolitan Transit System</p>

[by **ELECTRONIC SERVICE**] - Pursuant to Code of Civil Procedure section 1010.6 (effective January 1, 2023), I electronically served the document(s) to the person(s) at the electronic service address(es) listed above.

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

Executed January 11, 2024, at San Diego, California.

Lisa Whitaker
Print Name

By: *Lisa Whitaker*
Signature