555 Twin Dolphin Dr., Ste. 135 Redwood City, CA 94065 andrew@watters.law

EDUCATION

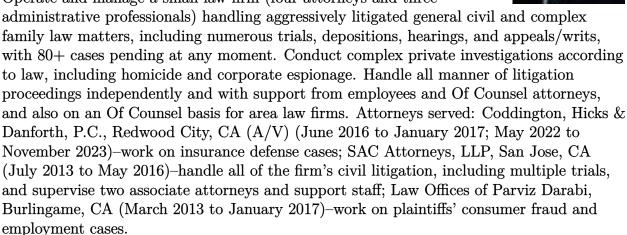
University of California College of Law, San Francisco, J.D., 2005. University of California Los Angeles, B.A., 2002.

EXPERIENCE

Andrew G. Watters, Esq., Redwood City, CA

Owner (July 2012 to present) (F/T)

Operate and manage a small law firm (four attorneys and three



WealthPLAN LLP, San Jose, CA (A/V)

Litigation Attorney (January 2011 to July 2012) (F/T)

Handled general civil and estate and trust litigation matters, including creditors' claim lawsuits, that arose from firm's specialized estate planning and trust administration practice. Took depositions of adverse parties and witnesses. Presented probate and trust-related petitions. Investigated and developed matters for trial, including extensive review of financial and other records, coordination with expert witnesses such as accountants and appraisers, client interviews, and written discovery. In March 2011, second-chaired \$7 million two-day court trial, including trial direct and cross examination of opposing party. Supervised by Francis B. Doyle, Esq. (A/V).

Robinson & Wood, Inc., San Jose, CA (A/V)

Litigation Attorney (April 2010 to December 2010) (F/T)

Assisted in the handling of insurance defense matters (70%), plaintiffs' personal injury/wrongful death matters (15%), and commercial litigation (15%). Took depositions of fact witnesses, including parties. Investigated and developed matters for trial. Conducted all necessary law and motion work and discovery, including Motions for Summary Adjudication. Supervised by Joseph C. Balestrieri, Esq. (A/V).

O'Brien Watters & Davis LLP, Santa Rosa, CA (A/V)

Litigation Attorney (February 2006 to May 2009) (F/T)

Handled general civil litigation (50%) and high-asset family law matters (50%). Worked up and tried (second chair) plaintiffs' fraud/financial elder abuse matter from client intake in Fall 2006 to ten-day jury trial in April 2009. Presented three days of trial direct and re-direct examinations of two expert witnesses. Worked up an aggressively litigated \$56 million Dissolution of Marriage involving financial irregularities, partnership valuation issues, a forty-three year marriage with a sixteen year separation, reverse-Pereira claims, stipulated distributions of multiple millions of dollars of property, and numerous motions, from intake in February 2006 to departure in May 2009. In 2008, presented (first chair) five-day Feldman motion, conducted substantially as a trial, seeking \$933,000 in attorney fees and sanctions under Family Code sec. 271 and sec. 2107. In 2006, tried (second chair) ten day jury trial for defendant general contractor in construction defect matter. In 2008, tried (first chair) and prevailed in court trial in dispute between firm and former client over professional fees. Assisted in dividing \$25 million in assets and resolving issues at five-day mediation. Prepared ninety-page property narrative from public records and aerial photography, proving community characterization by tracing property transactions and construction over a sixty year period (1948-2008). Took and defended thirty-two depositions; eight party or party-affiliated depositions defended. Prepared, filed, and argued all types of motions and orders to show cause. Handled all written discovery and filed or opposed all discovery motions. Interviewed, hired, and interfaced with expert witnesses. Supervised legal secretary and law clerk. Argued before First District Court of Appeal in free speech matter. Analyzed outpatient imaging center and ambulatory surgery center program model for 45-physician medical group under Federal "Stark II" regulation in 2007. Supervised by Michael G. Watters, Esq. (A/V) (2/23/2006-12/31/2008); by Joseph A. Piasta, Esq. (A/V) (1/1/2009-5/29/2009). Published case: Bonfigli v. Strachan (2011) 192 Cal. App. 4th 1302 (trial counsel).

ACTIVITIES, AWARDS, AND LICENSES

Bar admissions: California (#237990, 11/22/2005); U.S. District Court for the Northern District of California (12/2005); U.S. District Court for the Central District of California (8/2023); U.S. Bankruptcy Court for the Northern District of California (5/2011). Member, Armed Forces Communications and Electronics Association (AFCEA), 2013-present. Guest Lecturer, Stanford University Program in Writing and Rhetoric, 2011-2012. Theta Chi International Fraternity: President, Beta Alpha Chapter at UCLA, 2001. UCLA Mock Trial: Attorney, Witness 2001-2002. National Championship participant 2002.

MISCELLANEOUS

Total trials: thirty-four (five jury trials and twenty-nine court trials), plus three JAMS arbitrations. Total depositions taken: 100+ (median length 150 pages). Total depositions defended: 30+. Proficient in standard Windows/Mac office applications, plus image editors, desktop publishing software, Linux/Unix, HTML/CSS, and PHP/SQL (hand-coded). Part-time guitar builder and computer systems integrator: https://www.raellic.com

TRIAL RECORD

Case and Venue	Result	Notes
37. In re Marriage of Davis, Alameda Co., two-	1005410	Decision expected Fall
day date of separation trial, 2024.		2024.
36. Gong v. Cheung, Los Angeles Co., three-day		Decision expected Fall
trial over a charitable organization, 2024.		2024.
35. Bhas v. Bhas, San Mateo Co., half-day in-	Won	Client prevailed.
come available for support trial, 2024.		1
34. Ma v. Olabi, San Mateo Co., three-day un-	Lost	Unsuccessful defense of un-
lawful detainer jury trial, 2024.		lawful detainer centered on
,		Tenant Protection Act.
33. Galliano v. Langlinais, San Mateo Co., two-	Lost	Long-term support denied.
day long-term support modification trial, 2023.		
32. Olabi v. Ma, San Mato Co., one-day civil	Won	Civil Harassment Restrain-
harassment trial, 2023.		ing Order granted.
31. Whitney v. Welsh, San Mateo Co., half-day	Won	DVRO in favor of client
domestic violence renewal trial, 2023.		renewed.
30. Xu v. Chun, San Mateo Co., 2-day divorce	Lost	Opposing party substan-
trial, 2023.		tially prevailed.
29. Rudy v. Ragual, San Mateo Co., 1-day Mar-	Won	\$458,000 money judgment
vin v. Marvin-type trial, 2023.		for client for support, plus
		sale of joint property.
28. Taiebat v. Abdolyousefi, Santa Clara Co.,	Won	DVRO in favor of client
1-day domestic violence trial, 2022.		granted, DVRO against
		client denied.
27. Zada v. El Shami, San Mateo Co., 3-day	Won	Client substantially pre-
divorce trial, 2022.		vailed.
26. Javanmard v. Asgari, Santa Clara Co., half-	Won	DVRO denied after trial.
day domestic violence trial, 2022.		
25. Galan v. Pada, Santa Clara County, half-day	Lost	Unsuccessful defense of
domestic violence trial, 2022	***	DVRO.
24. In re Marriage of Forrester, San Mateo	Won	Client substantially pre-
County, 5-day divorce trial, 2021	T'	vailed.
23. Acosta v. Acosta, San Mateo County, 3-day	Lost	Unsuccessful defense of
domestic violence trial, 2021	T	DVRO.
22. In re Marriage of Shirname, Contra Costa	Lost	Opposing party substan-
County, 2-day divorce trial, 2021	11 7	tially prevailed.
21. Reyes v. Lopez, San Mateo County, 3-day	Won	DVRO denied after trial.
domestic violence trial, 2020		

20. Petty-Eifert v. Aviano Enterprises, Inc., San Francisco County, 3-day JAMS arbitration, 2020. 19. Wang v. Alipay, Santa Clara County, 5-day JAMS arbitration, 2019 18. In re Marriage of Sarkar, San Mateo County, 2-day trial on date of separation, 2019 17. Kingsdale v. Chan, U.S. Bankruptcy Court, 1-day court trial, 2019. 18. In re Marriage of Sarkar, San Mateo County, 2-day trial on date of separation, 2019 19. Won 20. Date of separation was as stated by my client. 20. Bold discharged and the judgment was less than the offer. 20. Enforcement of judgment/MSA 21. Enforcement of judgment/MSA 23. Lost 24. Unsuccessful defense of DVRO. 24. Frazer v. Chan, Contra Costa County, 5-day court trial, 2017. 25. Hoda Globe v. Cai, Santa Clara County, 5-day court trial, 2016. 26. Jiang v. IvyMax, Inc., San Mateo County, 3-day JAMS arbitration, 2016. 27. Wang v. Chan, Alameda County, 3-day gury trial, 2015. 28. Buckley v. Control Line Electric, Inc., Santa Clara County, 5-day court trial, 2015. 29. Andaya v. Cassara, Alameda County, 3-day gury trial, 2015. 30. Andaya v. Cassara, Santa Clara County, 3-day gury trial, 2015. 31. Former employee competed with client's business. 32. Won 33. Small jury case. 34. 10,000 judgment for Plaintiff in a fraud case. 34. 10,000 judgment for Plaintiff in a fraud case. 35. Small judgment for Plaintiff in a fraud case. 36. Unsuccessful defense of DVRO. 37. Wang v. Wang, Santa Clara County, 3-day 38. Small judgment for Plaintiff in a fraud case. 38. Small judgment for Plaintiff in a fraud case. 39. Mondaya v. Cassara, three-day trust administration trial, 2014. 40. Over trial, 2014. 40. Over trial, 2015. 40. Won 41. County, 5-day court trial, 2015. 40. Won 42. Calletie trial arbitration. 40. Serith Savara Clara trial tri	Case and Venue	Result	Notes
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13. Hoda Globe v. Cai, Santa Clara County, 5- day court trial, 2016. 12. Jiang v. IvyMax, Inc., San Mateo County, 5-day jury trial, 2016. 11. Fong v. Intero Realty, Santa Clara County, 3-day JAMS arbitration, 2016. 10. IvyMax v. Chan, Alameda County, 1-day court trial, 2015. 9. Andaya v. Cassara, Alameda County, 3-day jury trial, 2015 8. Buckley v. Control Line Electric, Inc., Santa Clara County, 5-day court trial, 2015. 7. Wang v. Wang, Santa Clara County, 3-day court trial, 2014. 6. Ponce v. Ponce, one-day domestic violence trial, 2014. 5. Pestana v. Pestana, three-day trust administration in a fraud case and sanctions against him regarding \$7 million trust.	14. Frazer v. Chan, Contra Costa County, 5-day	Lost	Real estate fraud case.
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12. Jiang v. IvyMax, Inc., San Mateo County, 5-day jury trial, 2016. 11. Fong v. Intero Realty, Santa Clara County, 3-day JAMS arbitration, 2016. 10. IvyMax v. Chan, Alameda County, 1-day court trial, 2015. 9. Andaya v. Cassara, Alameda County, 3-day jury trial, 2015 8. Buckley v. Control Line Electric, Inc., Santa Clara County, 5-day court trial, 2015. 7. Wang v. Wang, Santa Clara County, 3-day court trial, 2014. 6. Ponce v. Ponce, one-day domestic violence trial, 2014. 5. Pestana v. Pestana, three-day trust adminis- tration trial, 2011 Won Defense verdict in fraud case. Real estate arbitration. Former employee competed with client's business. Won Small jury verdict in personal injury case. \$\frac{410,000}{2} \text{ judgment for Plaintiff in a fraud case.} Unsuccessful defense of DVRO. Removal of trustee and sanctions against him regarding \$7 million trust.	13. Hoda Globe v. Cai, Santa Clara County, 5-	Lost	Settled before final deci-
5-day jury trial, 2016. 11. Fong v. Intero Realty, Santa Clara County, 3-day JAMS arbitration, 2016. 10. IvyMax v. Chan, Alameda County, 1-day court trial, 2015. 9. Andaya v. Cassara, Alameda County, 3-day jury trial, 2015 8. Buckley v. Control Line Electric, Inc., Santa Clara County, 5-day court trial, 2015. 7. Wang v. Wang, Santa Clara County, 3-day court trial, 2014. 6. Ponce v. Ponce, one-day domestic violence trial, 2014. 5. Pestana v. Pestana, three-day trust administration trial, 2011 Casse. Real estate arbitration. Real estate arbitration. Real estate arbitration. Real estate arbitration. Small jury verdict in personal injury case. Won \$\$410,000\$ judgment for Plaintiff in a fraud case. Unsuccessful defense of DVRO. Removal of trustee and sanctions against him regarding \$7 million trust.	day court trial, 2016.		sion.
11. Fong v. Intero Realty, Santa Clara County, 3-day JAMS arbitration, 2016. 10. IvyMax v. Chan, Alameda County, 1-day court trial, 2015. 9. Andaya v. Cassara, Alameda County, 3-day jury trial, 2015 8. Buckley v. Control Line Electric, Inc., Santa Clara County, 5-day court trial, 2015. 7. Wang v. Wang, Santa Clara County, 3-day court trial, 2014. 6. Ponce v. Ponce, one-day domestic violence trial, 2014. 7. Pestana v. Pestana, three-day trust administration trial, 2011 Real estate arbitration. Rowner employee competed with client's business. Won Small jury verdict in personal injury case. \$410,000 judgment for Plaintiff, including \$200,000 in punitive damages. Unsuccessful defense of DVRO. Removal of trustee and sanctions against him regarding \$7 million trust.	12. Jiang v. IvyMax, Inc., San Mateo County,	Won	Defense verdict in fraud
3-day JAMS arbitration, 2016. 10. IvyMax v. Chan, Alameda County, 1-day court trial, 2015. 9. Andaya v. Cassara, Alameda County, 3-day jury trial, 2015 8. Buckley v. Control Line Electric, Inc., Santa Clara County, 5-day court trial, 2015. 7. Wang v. Wang, Santa Clara County, 3-day court trial, 2014. 6. Ponce v. Ponce, one-day domestic violence trial, 2014. 7. Pestana v. Pestana, three-day trust administration trial, 2011 8. Buckley v. Control Line Electric, Inc., Santa Won Santal judgment for Plaintiff, including \$200,000 in punitive damages. 9. Wang v. Wang, Santa Clara County, 3-day court trial, 2014. 10. Lost Won Santal judgment for Plaintiff in a fraud case. 10. Unsuccessful defense of DVRO. 10. Removal of trustee and sanctions against him regarding \$7 million trust.	5-day jury trial, 2016.		case.
10. IvyMax v. Chan, Alameda County, 1-day court trial, 2015. 9. Andaya v. Cassara, Alameda County, 3-day jury trial, 2015 8. Buckley v. Control Line Electric, Inc., Santa Clara County, 5-day court trial, 2015. 7. Wang v. Wang, Santa Clara County, 3-day court trial, 2014. 6. Ponce v. Ponce, one-day domestic violence trial, 2014. 7. Pestana v. Pestana, three-day trust administration trial, 2011 8. Buckley v. Control Line Electric, Inc., Santa Won Small judgment for Plaintiff, including \$200,000 in punitive damages. 9. Wang Won Small judgment for Plaintiff in a fraud case. 1. Unsuccessful defense of DVRO. 1. Removal of trustee and sanctions against him regarding \$7 million trust.	11. Fong v. Intero Realty, Santa Clara County,	Lost	Real estate arbitration.
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8. Buckley v. Control Line Electric, Inc., Santa Clara County, 5-day court trial, 2015. 7. Wang v. Wang, Santa Clara County, 3-day court trial, 2014. 8. Buckley v. Control Line Electric, Inc., Santa Clara County, 5-day court trial, 2015. 9. Plaintiff, including \$200,000 in punitive damages. 9. Small judgment for Plaintiff in a fraud case. 9. Unsuccessful defense of DVRO. 9. Pestana v. Pestana, three-day trust administration trial, 2011 1. Won 1. Santa Won 2. Plaintiff, including \$200,000 in punitive damages. 9. Small judgment for Plaintiff in a fraud case. 9. Unsuccessful defense of DVRO. 9. Removal of trustee and sanctions against him regarding \$7 million trust.	9. Andaya v. Cassara, Alameda County, 3-day	Won	Small jury verdict in per-
Clara County, 5-day court trial, 2015. Plaintiff, including \$200,000 in punitive damages. 7. Wang v. Wang, Santa Clara County, 3-day court trial, 2014. 6. Ponce v. Ponce, one-day domestic violence trial, 2014. 5. Pestana v. Pestana, three-day trust administration trial, 2011 Won Removal of trustee and sanctions against him regarding \$7 million trust.	jury trial, 2015		sonal injury case.
7. Wang v. Wang, Santa Clara County, 3-day court trial, 2014. 6. Ponce v. Ponce, one-day domestic violence trial, 2014. 5. Pestana v. Pestana, three-day trust administration trial, 2011 bin punitive damages. Small judgment for Plaintiff in a fraud case. Unsuccessful defense of DVRO. Removal of trustee and sanctions against him regarding \$7 million trust.	8. Buckley v. Control Line Electric, Inc., Santa	Won	\$410,000 judgment for
7. Wang v. Wang, Santa Clara County, 3-day court trial, 2014. 6. Ponce v. Ponce, one-day domestic violence trial, 2014. 5. Pestana v. Pestana, three-day trust administration trial, 2011 Count trial, 2011 County, 3-day was Small judgment for Plaintiff in a fraud case. Unsuccessful defense of DVRO. Removal of trustee and sanctions against him regarding \$7 million trust.	Clara County, 5-day court trial, 2015.		Plaintiff, including \$200,000
court trial, 2014. 6. Ponce v. Ponce, one-day domestic violence trial, 2014. 5. Pestana v. Pestana, three-day trust administration trial, 2011 Court trial, 2014. Lost Unsuccessful defense of DVRO. Removal of trustee and sanctions against him regarding \$7 million trust.			in punitive damages.
6. Ponce v. Ponce, one-day domestic violence trial, 2014. 5. Pestana v. Pestana, three-day trust administration trial, 2011 Example 1	7. Wang v. Wang, Santa Clara County, 3-day	Won	Small judgment for Plaintiff
trial, 2014. 5. Pestana v. Pestana, three-day trust administration trial, 2011 tration trial, 2011 DVRO. Removal of trustee and sanctions against him regarding \$7 million trust.	court trial, 2014.		in a fraud case.
5. Pestana v. Pestana, three-day trust adminis- tration trial, 2011 Won Removal of trustee and sanctions against him re- garding \$7 million trust.	6. Ponce v. Ponce, one-day domestic violence	Lost	Unsuccessful defense of
tration trial, 2011 sanctions against him regarding \$7 million trust.	trial, 2014.		DVRO.
garding \$7 million trust.	5. Pestana v. Pestana, three-day trust adminis-	Won	Removal of trustee and
	tration trial, 2011		sanctions against him re-
			garding \$7 million trust.
4. OWD v. Smith, Sonoma County, nan-day Won Collections action.	4. OWD v. Smith, Sonoma County, half-day	Won	Collections action.
court trial, 2008	court trial, 2008		

Case and Venue	Result	Notes
3. OWD v. Toress, Sonoma County, half-day	Won	Workplace violence re-
court trial, 2008		straining order.
2. Bonfigli v. Strachan, Sonoma County, 10-day	Lost	Won on re-trial following
jury trial, 2007* Second chair.		appellate reversal due to
		error in first trial.
1. Gonsalves v. Crabtree, Sonoma County, 5-day	Lost	Client declined to pay for
jury trial, 2006* Second chair.		defective windows.
https://www.andrewwatters.com/law/docs/	18W	
	17L	