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#### ARGUMENT

## A. THE COURT IS AUTHORIZED TO GRANT THIS MOTION TO COMPEL RESPONSES BECAUSE OF 'S BLATANT FAILURE TO COMPLY WITH THE DISCOVERY ACT

I Code of Civil Procedure § 2031.300(b), states in pertinent part that if a party fails to respond to a demand for inspection of documents, the propounding party may move the court for an order compelling responses. There is no time limit for bringing the motion to compel. The party to whom the inspection demand is directed also waives any objection to the demand unless the party's failure to serve a response was due to "mistake, inadvertence, or excusable neglect." Code of Civil Procedure § 2031.300(a). In addition, the court "shall" impose monetary sanctions against a party who unsuccessfully opposes a motion to compel unless it finds that the party acted "with substantial justification" or other circumstances render sanctions "unjust." Code of Civil Procedure § 2031.300(c).

The moving party is also not required to show a "reasonable and good faith attempt" to resolve the matter informally with opposing counsel before filing the motion. Sinaiko Healthcare Consulting, Inc. v. Pacific Healthcare Consultants (2007) 148 Cal.App.4th 390, 404 (2007).

No separate statement is required when no response has been provided to the discovery.

California Rule of Court 3.1345(b).

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web one more point needs to be emphasized about the relationship between electron configuration and the periodic table the atoms of elements in the same vertical column of the table have similar electron configurations for example consider the alkaline earth elements group iia

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web predictions from reliable sources have been used for these elements grayed out electron numbers indicate subshells filled to their maximum bracketed noble gas symbols on the left represent inner configurations that are the same in each period written out these are he 2 helium 1s 2 ne 10 neon 1s 2 2s 2 2p 6

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web q1 what is the electron configuration of the element potassium answer the atomic number of potassium is 19 a neutral potassium element has 19 electrons its electron configuration is 1s 2 2s 2 2p 6 3s 2 3p 6 4s 1 or simply put ar 4s 1 q2 what is the total number of electrons that can be filled in s p and d subshells

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web by building up from hydrogen this table can be used to determine the electron configuration for any atom on the periodic table we will now construct the ground state electron configuration and orbital diagram for a selection of atoms in the first and second periods of the periodic table

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web electron configurations are a simple way of writing down the locations of all of the electrons in an atom as we know the positively charged protons in the nucleus of an atom tend to attract negatively charged electrons

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