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Attorney for Plaintiffs PAUL ATREIDES

SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF ARRAKEEN

|  |  |
| --- | --- |
| PAUL ATREIDES, an individual    Plaintiffs,  vs.  FEYD RAUTHA, an individual, and DOES 1 through 30, inclusive.  Defendants. | Case No.:22STCV11111  PLAINTIFF PAUL ATREIDES’S RESPONSES TO DEFENDANT’S FORM INTERROGATORIES, SET ONE |

PROPOUNDING PARTY: DEFENDANT – FEYD RAUTHA

RESPONDING PARTY: PLAINTIFF – PAUL ATREIDES

SET NUMBER: ONE

**PRELIMINARY STATEMENT**

The following responses are made solely for the purpose of this litigation. Each response is subject to all appropriate objections, including but not limited to, objections concerning privilege, competency, relevancy, materiality, propriety, and admissibility, which would require the exclusion of any statement contained therein if the interrogatory were asked of a witness present and testifying in court, or if any statements contained therein, if the answer were given by a witness. All such objections are reserved and may be interposed at the time of trial.

The following responses are based on the facts and information presently known and available to Plaintiff PAUL ATREIDES (hereinafter referred to as “RESPONDING PARTY”). Discovery, investigation, research and analysis are ongoing in this case and may disclose the existence of additional documents, add meaning to known facts, establish entirely new factual or legal contentions, or possibly lead to additions, variations, and changes to these responses and production. Consequently, the following responses are given without prejudice to RESPONDING PARTY’s right to produce at the time of trial subsequently discovered or recognized evidence discovered, relating to proof of subsequently discovered or recognized material facts.

Except for facts explicitly admitted, no admissions of any kind whatsoever are implied or should be inferred from these responses. The fact that an interrogatory has been answered should not be taken as an admission or any acceptance of the existence of any facts set forth or assumed by such interrogatory, or that such answer constitutes admissible evidence. RESPONDING PARTY reserves the right to object to the admissibility of any response, fact, or document at the time of trial or any pre-trial proceeding. The preliminary statement is incorporated into each of the responses set forth below.

**GENERAL OBJECTIONS TO SPECIAL INTERROGATORIES**

1. RESPONDING PARTY objects to the interrogatories in their entirety, and to each individual interrogatory, to the extent they require RESPONDING PARTY to provide information that is protected from disclosure by the attorney-client privilege, the attorney-work product doctrine, or any other constitutional, statutory of common law privilege or production.
2. RESPONDING PARTY objects to each interrogatory to the extent it violates RESPONDING PARTY’s constitutionally protected right to privacy under Article I, section I of the California Constitution.
3. RESPONDING PARTY further objects to the interrogatories in their entirety, and to each individual interrogatory, to the extent they seek: (a) information that is neither relevant to the subject matter of this action, not reasonably calculated to lead to discovery of admissible evidence; and/or (b) information that might be conceivably relevant but so remotely relevant to the subject matter of the action as to make disclosure of little or no practical benefit to the PROPOUNDING PARTY.
4. RESPONDING PARTY further objects to the interrogatories in their entirety, and to each individual interrogatory, to the extent they purport to require RESPONDING PARTY to provide confidential, sensitive, private, and/or proprietary information related to RESPONDING PARTY and/or third parties.
5. RESPONDING PARTY further objects to the interrogatories in their entirety, and to each individual interrogatory, to the extent that they seek information that is already provided to the PROPOUNDING PARTY or the identification of documents that are already within the PROPOUNDING PARTY’s possession, custody, or control.
6. RESPONDING PARTY further objects to the interrogatories in their entirety, and to each individual interrogatory, to the extent that they seek information that is a matter of public record or equally available to the PROPOUNDING PARTY from a third-party.
7. RESPONDING PARTY further objects to the interrogatories in their entirety, and to each individual interrogatory, to the extent that they are not reasonably calculated as to time and scope and, as a result, are overbroad, vague, ambiguous, harassing, and/or unduly burdensome and oppressive.
8. RESPONDING PARTY further objects to the interrogatories in their entirety, and to each individual interrogatory, to the extent that they contain either subparts and/or a compound, conjunctive or disjunctive question.
9. RESPONDING PARTY further objects to the interrogatories in their entirety, and to each individual interrogatory, to the extent that they prematurely seek the disclosure of facts and/or information supporting RESPONDING PARTY’s claims against DEFENDANTS before RESPONDING PARTY has had a reasonable opportunity to complete RESPONDING PARTY’s investigation.
10. Each of the general objections is by this reference incorporated in full into each individual response set forth below, and each individual response is made subject to and without waiver of each general objection.
11. To the extent that certain of these general objections are cited in response to a particular interrogatory, those specific objections are provided because they are particularly applicable to the interrogatory and are not to be construed as a waiver of any other general objection applicable to information falling within the scope of the interrogatory.

Based upon and subject to the above, **PLAINTIFF PAUL ATREIDES** hereby responds to **DEFENDANT FEYD RAUTHA’s** Form Interrogatories, Set One as follows:

**Form Interrogatory #1.1:**

State the name, **ADDRESS,** telephone number, and relationship to you of each **PERSON** who prepared or assisted in the preparation of the responses to these interrogatories. *(Do not identify anyone who simply typed or reproduced the responses.)*

**Response to #1.1:**

Daniel J. Lavi, Esq., 9454 Wilshire Blvd, Penthouse Suite, Beverly Hills, CA 90212; Counsel for PAUL ATREIDES

**Form Interrogatory #2.1:**

State:

(a) your name

(b) every name you have used in the past

(c) the dates you used each name.

**Response to #2.1:**

RESPONDING PARTY responds as follows:

**Form Interrogatory #2.2**

State the date and place of your birth.

**Response to #2.2:**

RESPONDING PARTY responds as follows:

**Form Interrogatory #2.3:**

At the time of the INCIDENT, did you have a driver’s license? If so state:

1. The state or other issuing entity;
2. The license number and type;
3. The date of issuance; and
4. All restrictions.

**Response to # 2.3:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Responding party further objects to this discovery request on the grounds that it is not relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence [and to the extent it seeks information which does not concern events, conditions, or matters relating to the alleged actionable conduct underlying this lawsuit].  *See* CCP § 2017.010. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #2.4:**

At the time of the INCIDENT, did you have any other permit or license for the operation of a motor vehicle? If so, state:

1. The state or other issuing entity;
2. The license number and type;
3. The date of issuance; and
4. All restrictions

**Response to # 2.4:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Responding party further objects to this discovery request on the grounds that it is not relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence [and to the extent it seeks information which does not concern events, conditions, or matters relating to the alleged actionable conduct underlying this lawsuit].  *See* CCP § 2017.010. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #2.5:**

State:

(a) your present residence ADDRESS;

b) your residence ADDRESSES for the past five years; and

(c) the dates you lived at each ADDRESS.

**Response to #2.5:**

RESPONDING PARTY responds as follows:

**Form Interrogatory #2.6:**

State:

(a) the name, ADDRESS, and telephone number of your present employer or place of self-employment; and

(b) the name, ADDRESS, dates of employment, job title, and nature of work for each employer or self-employment you have had from five years before the INCIDENT until today.

**Response to #2.6:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:  Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #2.7:**

State:

(a) the name and ADDRESS of each school or other academic or vocational institution you have attended, beginning with high school;

(b) the dates you attended;

(c) the highest grade level you have completed; and

(d) the degrees received.

**Response to #2.7:**

RESPONDING PARTY responds as follows:

**Form Interrogatory #2.8:**

Have you ever been convicted of a felony? If so, for each conviction state:

(a) the city and state where you were convicted;

(b) the date of conviction;

(c) the offense; and

(d) the court and case number.

**Response to #2.8:**

Responding party objects to this discovery request on the grounds that it is not relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence [and to the extent it seeks information which does not concern events, conditions, or matters relating to the alleged actionable conduct underlying this lawsuit].  *See* CCP § 2017.010. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #2.9:**

Can you speak English with ease? If not, what language and dialect do you normally use?

**Response to #2.9:**

RESPONDING PARTY responds as follows:

**Form Interrogatory #2.10:**

Can you read and write English with ease? If not, what language and dialect do you normally use?

**Response to #2.10:**

RESPONDING PARTY responds as follows:

**Form Interrogatory #2.11:**

At the time of the INCIDENT were you acting as an agent or employee for any PERSON? If so, state:

1. The name, ADDRESS, and telephone number of that PERSON: and
2. A description of your duties.

**Response to # 2.11:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Responding party further objects to this discovery request on the grounds that it is not relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence [and to the extent it seeks information which does not concern events, conditions, or matters relating to the alleged actionable conduct underlying this lawsuit].  *See* CCP § 2017.010. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #2.12:**

At the time of the INCIDENT did you or any other person have any physical, emotional, or mental disability or condition that may have contributed to the occurrence of the INCIDENT? If so, for each person state:

(a) the name, ADDRESS, and telephone number;

(b) the nature of the disability or condition; and

(c) the manner in which the disability or condition contributed to the occurrence of the INCIDENT.

**Response to #2.12:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Plaintiff objects to this discovery request on the grounds that is it invades the responding party’s privacy rights because it seeks information, such as medical history, that is in violation of a party’s constitutionally protected right to privacy under Article I, section I of the California Constitution. See Vinson v. Sup. Crt. (1987) 43 Cal.3d 833, 842. Subject to, and without waiving the foregoing objection, RESPONDING PARTY responds as follows:

Discovery is ongoing and RESPONDING PARTY reserves the right to supplement this response at a later time as appropriate.

**Form Interrogatory #2.13:**

Within 24 hours before the INCIDENT did you or any person involved in the INCIDENT use or take any of the following substances: alcoholic beverage, marijuana, or other drug or medication of any kind (prescription or not)? If so, for each person state:

1. The name, ADDRESS, and telephone number;
2. The nature or description of each substance;
3. The quantity of each substance used or taken;
4. The date and time of day when each substance was used or taken;
5. The ADDRESS where each substance was used or taken;
6. The name, ADDRESS, and telephone number of each person who was present when each substance was used or taken; and
7. The name, ADDRESS and telephone number of any HEALTH CARE PROVIDER who prescribed or furnished the substance and the condition for which it was prescribed or furnished.

**Response to # 2.13:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Responding party further objects to this discovery request on the grounds that it is not relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence [and to the extent it seeks information which does not concern events, conditions, or matters relating to the alleged actionable conduct underlying this lawsuit].  *See* CCP § 2017.010. Subject to, and without waiving the foregoing objection, Responding Party responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #4.1:**

At the time of the INCIDENT, was there in effect any policy of insurance through which you were or might be insured in any manner (for example, primary, pro-rata, or excess liability coverage or medical expense coverage) for the damages, claims, or actions that have arisen out of the INCIDENT? If so, for each policy state:

(a) the kind of coverage;

(b) the name and ADDRESS of the insurance company;

(c) the name, ADDRESS, and telephone number of each named insured;

(d) the policy number;

(e) the limits of coverage for each type of coverage contained in the policy

(f) whether any reservation of rights or controversy or coverage dispute exists between you and the insurance company; and

(g) the name, ADDRESS, and telephone number of the custodian of the policy.

**Response to #4.1:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Plaintiff objects to this discovery request on the grounds that is it invades the responding party’s privacy rights because it seeks information, such as medical history, that is in violation of a party’s constitutionally protected right to privacy under Article I, section I of the California Constitution. See Vinson v. Sup. Crt. (1987) 43 Cal.3d 833, 842. Plaintiff objects to this discovery request on the grounds that it seeks privileged information to the extent it seeks information protected from disclosure by the attorney-client privilege or the attorney work-product doctrine. Privilege – See Cal. R. Evid. § 954; see also, Mitchell v. Sup. Crt. (1984) 37 Cal.3d 591, 601. Work Product – See CCP §§ 2018.020-2018.030. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #4.2:**

Are you self-insured under any statute for the damages, claims, or actions that have arisen out of the INCIDENT? If so, specify the statute.

**Response to #4.2:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #6.1:**

Do you attribute any physical, mental, or emotional injuries to the INCIDENT? (If your answer is “no,” do not answer interrogatories 6.2 through 6.7).

**Response to #6.1:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #6.2:**

Identify each injury you attribute to the INCIDENT and the area of your body affected.

**Response to #6.2:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:  Plaintiff suffers mental and emotional distress, discomfort, annoyance,

anxiety, and loss in the value of their leasehold.

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #6.3:**

Do you still have any complaints that you attribute to the INCIDENT? If so, for each complaint state:

(a) a description;

(b) whether the complaint is subsiding, remaining the same, or becoming worse; and

(c) the frequency and duration.

**Response to #6.3:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #6.4:**

Did you receive any consultation or examination (except from expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310) or treatment from a HEALTH CARE PROVIDER for any injury you attribute to the INCIDENT? If so, for each HEALTH CARE PROVIDER state:

(a) the name, ADDRESS, and telephone number;

(b) the type of consultation, examination, or treatment provided;

(c) the dates you received consultation, examination, or treatment; and

(d) the charges to date.

**Response to #6.4:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Responding party further objects to this discovery request on the grounds that is it invades the responding party’s privacy rights because it seeks information, such as medical history, that is in violation of a party’s constitutionally protected right to privacy under Article I, section I of the California Constitution. *See Vinson v. Sup. Crt.* (1987)43 Cal.3d 833, 842. Subject to, and without waiving the foregoing objection, Responding Party responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #6.5:**

Have you taken any medication, prescribed or not, as a result of injuries that you attribute to the INCIDENT? If so, for each medication state:

(a) the name;

(b) the PERSON who prescribed or furnished it;

(c) the date it was prescribed or furnished;

(d) the dates you began and stopped taking it; and

(e) the cost to date.

**Response to #6.5:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Responding party further objects to this discovery request on the grounds that is it invades the responding party’s privacy rights because it seeks information, such as medical history, that is in violation of a party’s constitutionally protected right to privacy under Article I, section I of the California Constitution. *See Vinson v. Sup. Crt.* (1987)43 Cal.3d 833, 842. Subject to, and without waiving the foregoing objection, Responding Party responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #6.6:**

Are there any other medical services necessitated by the injuries that you attribute to the INCIDENT that were not previously listed (for example, ambulance, nursing, prosthetics)? If so, for each service state:

(a) the nature;

(b) the date;

(c) the cost; and

(d) the name, ADDRESS, and telephone number of each provider.

**Response to #6.6**:

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Responding party further objects to this discovery request on the grounds that is it invades the responding party’s privacy rights because it seeks information, such as medical history, that is in violation of a party’s constitutionally protected right to privacy under Article I, section I of the California Constitution. *See Vinson v. Sup. Crt.* (1987)43 Cal.3d 833, 842. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #6.7:**

Has any HEALTH CARE PROVIDER advised that you may require future or additional treatment for any injuries that you attribute to the INCIDENT? If so, for each injury state:

(a) the name and ADDRESS of each HEALTH CARE PROVIDER;

(b) the complaints for which the treatment was advised; and

(c) the nature, duration, and estimated cost of the treatment.

**Response to #6.7:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Responding party further objects to this discovery request on the grounds that is it invades the responding party’s privacy rights because it seeks information, such as medical history, that is in violation of a party’s constitutionally protected right to privacy under Article I, section I of the California Constitution. *See Vinson v. Sup. Crt.* (1987)43 Cal.3d 833, 842. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #7.1:**

Do you attribute any loss of or damage to a vehicle or other property to the INCIDENT? If so, for each item of property:

(a) describe the property;

(b) describe the nature and location of the damage to the property;

(c) state the amount of damage you are claiming for each item of property and how the amount was calculated; and

(d) if the property was sold, state the name, ADDRESS, and telephone number of the seller, the date of sale, and the sale price.

**Response to #7.1:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Responding Party further objects to this discovery request on the grounds that is it overbroad, burdensome, and oppressive because it requires the responding party to prepare a compilation of data. *See* CCP § 2030.230; *see also, Brotsky v. State Bar of California* (1962) 57 Cal.2d 287.

Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #7.2:**

Has a written estimate or evaluation been made for any item of property referred to in your answer to the preceding interrogatory? If so, for each estimate or evaluation state:

(a) the name, ADDRESS, and telephone number of the PERSON who prepared it and the date prepared;

(b) the name, ADDRESS, and telephone number of each PERSON who has a copy of it; and

(c) the amount of damage stated.

**Response to #7.2:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Responding Party further objects to this discovery request on the grounds that is it overbroad, burdensome, and oppressive because it requires the responding party to prepare a compilation of data. *See* CCP § 2030.230; *see also, Brotsky v. State Bar of California* (1962) 57 Cal.2d 287.  Subject to, and without waiving the foregoing objection, Responding Party responds as follows:  Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #7.3:**

Has any item of property referred to in your answer to interrogatory 7.1 been repaired? If so, for each item state:

(a) the date repaired;

(b) a description of the repair;

(c) the repair cost;

(d) the name, ADDRESS, and telephone number of the PERSON who repaired it;

(e) the name, ADDRESS, and telephone number of the PERSON who paid for the repair.

**Response to #7.3:**

Responding Party objects to this discovery request on the grounds that is it overbroad, burdensome, and oppressive because it requires the responding party to prepare a compilation of data. *See* CCP § 2030.230; *see also, Brotsky v. State Bar of California* (1962) 57 Cal.2d 287.

Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #8.1:**

Do you attribute any loss of income or earning capacity to the INCIDENT? (If your answer is “no,” do not answer interrogatories 8.2 through 8.8).

**Response to #8.1:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #8.2:**

State:

1. The nature of your work;
2. Your job title at the time of the INCIDENT; and
3. The date your employment began

**Response to # 8.2:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #8.3:**

State the last date before the INCIDENT that you worked for compensation.

**Response to # 8.3:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #8.4:**

State your monthly income at the time of the INCIDENT and how the amount was calculated

**Response to # 8.4:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:. Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #8.5:**

State the date you returned to work at each place of employment following the INCIDENT.

**Response to # 8.5:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #8.6:**

State the dates you did not work and for which you lost income as a result of the INCIDENT.

**Response to # 8.6:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #8.7:**

State the total income you have lost to date as a result of the INCIDENT and how the amount was calculated.

**Response to # 8.7:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #8.8:**

Will you lose income in the future as a result of the INCIDENT? If so, state:

1. The facts upon which you base this contention;
2. An estimate of the amount;
3. An estimate of how long you will be unable to work; and
4. How the claim for future income is calculated

**Response to # 8.8:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #9.1:**

Are there any other damages that you attribute to the INCIDENT? If so, for each item of damage state:

(a) the nature;

(b) the date it occurred;

(c) the amount; and

(d) the name, ADDRESS, and telephone number of each PERSON to whom an obligation was incurred.

**Response to #9.1:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Refund of rent, emotional distress, punitive damages, attorneys fees, out of pocket expenses, amounts unknown at this time. Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #9.2:**

Do any DOCUMENTS support the existence or amount of any item of damages claimed in interrogatory 9.1? If so, describe each document and state the name, ADDRESS, and telephone number of the PERSON who has each DOCUMENT.

**Response to #9.2:**

RESPONDING PARTY responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #10.1:**

At any time before the INCIDENT did you have complaints or injuries that involved the same part of your body claimed to have been injured in the INCIDENT? If so, for each state:

(a) a description of the complaint or injury;

(b) the dates it began and ended; and

(c) the name, ADDRESS, and telephone number of each HEALTH CARE PROVIDER whom you consulted or who examined or treated you.

**Response to #10.1:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #10.2:**

List all physical, mental, and emotional disabilities you had immediately before the INCIDENT. (You may omit mental or emotional disabilities unless you attribute any mental or emotional injury to the INCIDENT.)

**Response to #10.2:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #10.3:**

At any time after the INCIDENT, did you sustain injuries of the kind for which you are now claiming damages? If so, for each incident giving rise to an injury state:

(a) the date and the place it occurred;

(b) the name, ADDRESS, and telephone number of any other PERSON involved;

(c) the nature of any injuries you sustained;

(d) the name, ADDRESS, and telephone number of each HEALTH CARE PROVIDER who you consulted or who examined or treated you; and

(e) the nature of the treatment and its duration.

**Response to #10.3:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #11.1:**

Except for this action, in the past 10 years have you filed an action or made a written claim or demand for compensation for your personal injuries? If so, for each action, claim, or demand state:

(a) the date, time, and place and location (closest street ADDRESS or intersection) of the INCIDENT giving rise to the action, claim, or demand;

(b) the name, ADDRESS, and telephone number of each PERSON against whom the claim or demand was made or the action filed;

(c) the court, names of the parties, and case number of any action filed;

(d) the name, ADDRESS, and telephone number of any attorney representing you;

(e) whether the claim or action has been resolved or is pending; and

(f) a description of the injury.

**Response to #11.1:**

Plaintiff objects to this discovery request on the grounds that it seeks privileged information to the extent it seeks information protected from disclosure by the attorney-client privilege or the attorney work-product doctrine. Privilege – See Cal. R. Evid. § 954; see also, Mitchell v. Sup. Crt. (1984) 37 Cal.3d 591, 601. Work Product – See CCP §§ 2018.020-2018.030. Plaintiff objects to this discovery request on the grounds that it is not relevant to this litigation nor reasonably calculated to lead to the discovery of admissible evidence [and to the extent it seeks information which does not concern events, conditions, or matters relating to the alleged actionable conduct underlying this lawsuit]. See CCP § 2017.010. Subject to and without waiving the foregoing objections, responding party hereby responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #11.2:**

In the past 10 years have you made a written claim or demand for workers' compensation benefits? If so, for each claim or demand state:

(a) the date, time, and place of the INCIDENT giving rise to the claim;

(b) the name, ADDRESS, and telephone number of your employer at the time of the injury;

(c) the name, ADDRESS, and telephone number of the workers’ compensation insurer and the claim number;

(d) the period of time during which you received workers’ compensation benefits;

(e) a description of the injury;

(f) the name, ADDRESS, and telephone number of any HEALTH CARE PROVIDER who provided services; and

(g) the case number at the Workers’ Compensation Appeals Board.

**Response to #11.2:**

Plaintiff objects to this discovery request on the grounds that it seeks privileged information to the extent it seeks information protected from disclosure by the attorney-client privilege or the attorney work-product doctrine. Privilege – See Cal. R. Evid. § 954; see also, Mitchell v. Sup. Crt. (1984) 37 Cal.3d 591, 601. Work Product – See CCP §§ 2018.020-2018.030. Plaintiff objects to this discovery request on the grounds that is it overbroad, burdensome, and oppressive because it requires the responding party to prepare a compilation of data. *See* CCP § 2030.230; *see also, Brotsky v. State Bar of California* (1962) 57 Cal.2d 287. Subject to and without waiving the foregoing objections, responding party hereby responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #12.1:**

State the name, ADDRESS, and telephone number of each individual:

(a) who witnessed the INCIDENT or the events occurring immediately before or after the INCIDENT;

(b) who made any statement at the scene of the INCIDENT;

(c) who heard any statements made about the INCIDENT by any individual at the scene; and

(d) who YOU OR ANYONE ACTING ON YOUR BEHALF claim has knowledge of the INCIDENT (except for expert witnesses covered by Code of Civil Procedure section 2034).

**Response to #12.1:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Plaintiffs, contactable through counsel. Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #12.2:**

Have YOU OR ANYONE ACTING ON YOUR BEHALF interviewed any individual concerning the INCIDENT? If so, for each individual state:

(a) the name, ADDRESS, and telephone number of the individual interviewed;

(b) the date of the interview; and

(c) the name, ADDRESS, and telephone number of the PERSON who conducted the interview.

**Response to #12.2:**

RESPONDING PARTY responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #12.3:**

Have YOU OR ANYONE ACTING ON YOUR BEHALF obtained a written or recorded statement from any individual concerning the INCIDENT? If so, for each statement state:

(a) the name, ADDRESS, and telephone number of the individual from whom the statement was obtained;

(b) the name, ADDRESS, and telephone number of the individual who obtained the statement

(c) the date the statement was obtained; and

(d) the name, ADDRESS, and telephone number of each PERSON who has the original statement or a copy.

**Response to #12.3:**

RESPONDING PARTY responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #12.4:**

Do YOU OR ANYONE ACTING ON YOUR BEHALF know of any photographs, films, or videotapes depicting any place, object, or individual concerning the INCIDENT or plaintiff's injuries? If so, state:

(a) the number of photographs or feet of film or videotape;

(b) the places, objects, or persons photographed, filmed, or videotaped;

(c) the date the photographs, films, or videotapes were taken;

(d) the name, ADDRESS, and telephone number of the individual taking the photographs, films, or videotapes; and

(e) the name, ADDRESS, and telephone number of each PERSON who has the original or a copy of the photographs, films, or videotapes.

**Response to #12.4:**

Plaintiff objects to this discovery request on the grounds that it seeks privileged information to the extent it seeks information protected from disclosure by the attorney-client privilege or the attorney work-product doctrine. Privilege – *See* Cal. R. Evid. § 954; *see also, Mitchell v. Sup*. Crt. (1984) 37 Cal.3d 591, 601. Work Product –*See* CCP §§ 2018.020-2018.030. Plaintiff objects to this discovery request on the grounds that is it overbroad, burdensome, and oppressive because it requires the responding party to prepare a compilation of data. *See* CCP § 2030.230; *see also, Brotsky v. State Bar of California* (1962) 57 Cal.2d 287. Plaintiff objects to this discovery request on the grounds that it is unduly burdensome and designed to harass and annoy the responding party. *See* CCP § 2030.090(b); *see also, Columbia Broadcasting System, Inc*. *v. Sup. Crt. of Los Angeles County* (1968) 263 Cal.App.2d 12, 19. Subject to and without waiving the foregoing objections, responding party hereby responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #12.5:**

Do YOU OR ANYONE ACTING ON YOUR BEHALF know of any diagram, reproduction, or model of any place or thing (except for items developed by expert witnesses covered by Code of Civil Procedure sections 2034.210– 2034.310) concerning the INCIDENT? If so, for each item state:

(a) the type (i.e., diagram, reproduction, or model);

(b) the subject matter; and

(c) the name, ADDRESS, and telephone number of each PERSON who has it.

**Response to #12.5:**

RESPONDING PARTY responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #12.6:**

Was a report made by any PERSON concerning the INCIDENT? If so, state:

(a) the name, title, identification number, and employer of the PERSON who made the report;

(b) the date and type of report made;

(c) the name, ADDRESS, and telephone number of the PERSON for whom the report was made; and

(d) the name, ADDRESS, and telephone number of each PERSON who has the original or a copy of the report.

**Response to #12.6:**

RESPONDING PARTY responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #12.7:**

Have YOU OR ANYONE ACTING ON YOUR BEHALF inspected the scene of the INCIDENT? If so, for each inspection state:

(a) the name, ADDRESS, and telephone number of the individual making the inspection (except for expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310); and

(b) the date of the inspection.

**Response to #12.7:**

RESPONDING PARTY responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #13.1:**

Have YOU OR ANYONE ACTING ON YOUR BEHALF conducted surveillance of any individual involved in the INCIDENT or any party to this action? If so, for each surveillance state:

(a) the name, ADDRESS, and telephone number of the individual or party;

(b) the time, date, and place of the surveillance;

(c) the name, ADDRESS, and telephone number of the individual who conducted the surveillance; and

(d) the name, ADDRESS, and telephone number of each PERSON who has the original or a copy of any surveillance photograph, film, or videotape.

**Response to #13.1:**

RESPONDING PARTY responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #13.2:**

Has a written report been prepared on the DISC-001 surveillance? If so, for each written report state:

(a) the title;

(b) the date;

(c) the name, ADDRESS, and telephone number of the individual who prepared the report; and

(d) the name, ADDRESS, and telephone number of each PERSON who has the original or a copy.

**Response to #13.2:**

RESPONDING PARTY responds as follows: No. Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #14.1:**

Do YOU OR ANYONE ACTING ON YOUR BEHALF contend that any PERSON involved in the INCIDENT violated any statute, ordinance, or regulation and that the violation was a legal (proximate) cause of the INCIDENT? If so, identify the name, ADDRESS, and telephone number of each PERSON and the statute, ordinance, or regulation that was violated.

**Response to #14.1:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Responding Party further objects to this discovery request on the grounds that the request asks for a legal conclusion. Subject to, and without waiving the foregoing objection, Responding Party responds as follows:

Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #14.2:**

Was any PERSON cited or charged with a violation of any statute, ordinance, or regulation as a result of this INCIDENT? If so, for each PERSON state:

(a) the name, ADDRESS, and telephone number of the PERSON;

(b) the statute, ordinance, or regulation allegedly violated;

(c) whether the PERSON entered a plea in response to the citation or charge and, if so, the plea entered; and

(d) the name and ADDRESS of the court or administrative agency, names of the parties, and case number.

**Response to #14.2:**

RESPONDING PARTY objects to this interrogatory on the grounds that “INCIDENT” is undefined, vague, ambiguous, overly broad, oppressive, unduly burdensome and/or harassing. Responding Party further objects to this discovery request on the grounds that the request asks for a legal conclusion. Subject to, and without waiving the foregoing objection, Responding Party responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #17.1:**

Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission:

(a) state the number of the request;

(b) state all facts upon which you base your response;

(c) state the names, ADDRESSES, and telephone numbers of all PERSONS who have knowledge of those facts; and

(d) identify all DOCUMENTS and other tangible things that support your response and state the name, ADDRESS, and telephone number of the PERSON who has each DOCUMENT or thing.

**Response to #17.1:**

Plaintiff objects to this discovery request on the grounds that it seeks privileged information to the extent it seeks information protected from disclosure by the attorney-client privilege or the attorney work-product doctrine. **Privilege** – *See* Cal. R. Evid. § 954; *see also, Mitchell v. Sup*. Crt. (1984) 37 Cal.3d 591, 601. **Work Product –** *See* CCP §§ 2018.020-2018.030. Plaintiff objects to this discovery request on the grounds that it is unduly burdensome and designed to harass and annoy the responding party. *See* CCP § 2030.090(b); *see also, Columbia Broadcasting System, Inc*. *v. Sup. Crt. of Los Angeles County* (1968) 263 Cal.App.2d 12, 19. Plaintiff objects to this discovery request on the grounds that is it overbroad, burdensome, and oppressive because it requires the responding party to prepare a compilation of data. *See* CCP § 2030.230; *see also, Brotsky v. State Bar of California* (1962) 57 Cal.2d 287. Subject to and without waiving the foregoing objections, responding party hereby responds as follows:

Discovery is ongoing and responding party reserve the right to supplement this response at a later time as appropriate.

**Form Interrogatory #50.1:**

For each agreement alleged in the pleadings:

(a) identify each DOCUMENT that is part of the agreement and for each state the name, ADDRESS, and telephone number of each PERSON who has the DOCUMENT;

(b) state each part of the agreement not in writing, the name, ADDRESS, and telephone number of each PERSON agreeing to that provision, and the date that part of the agreement was made;

(c) identify all DOCUMENTS that evidence any part of the agreement not in writing and for each state the name, ADDRESS, and telephone number of each PERSON who has the DOCUMENT;

(d) identify all DOCUMENTS that are part of any modification to the agreement, and for each state the name, ADDRESS, and telephone number of each PERSON who has the DOCUMENT;

(e) state each modification not in writing, the date, and the name, ADDRESS, and telephone number of each PERSON agreeing to the modification, and the date the modification was made; (f) identify all DOCUMENTS that evidence any modification of the agreement not in writing and for each state the name, ADDRESS, and telephone number of each PERSON who has the DOCUMENT.

**Response to #50.1:**

Plaintiff objects to this discovery request on the grounds that it seeks privileged information to the extent it seeks information protected from disclosure by the attorney-client privilege or the attorney work-product doctrine.  **Privilege** – *See* Cal. R. Evid. § 954; *see also, Mitchell v. Sup*. Crt. (1984) 37 Cal.3d 591, 601.  **Work Product –** *See* CCP §§ 2018.020-2018.030. Plaintiff objects to this discovery request on the grounds that is it overbroad, burdensome, and oppressive because it requires the responding party to prepare a compilation of data. *See* CCP § 2030.230; *see also, Brotsky v. State Bar of California* (1962) 57 Cal.2d 287. Plaintiff objects to this discovery request on the grounds that it is unduly burdensome and designed to harass and annoy the responding party. *See* CCP § 2030.090(b); *see also, Columbia Broadcasting System, Inc*. *v. Sup. Crt. of Los Angeles County* (1968) 263 Cal.App.2d 12, 19. Subject to and without waiving the foregoing objections, responding party hereby responds as follows: Discovery is ongoing and responding party reserve the right to amend and/or supplement this response at a later time as appropriate.

**Form Interrogatory #50.2:**

Was there a breach of any agreement alleged in the pleadings? If so, for each breach describe and give the date of every act or omission that you claim is the breach of the agreement.

**Response to #50.2:**

Plaintiff objects to this discovery request on the grounds that the request asks for a legal conclusion. Subject to and without waiving the foregoing objections, responding party hereby responds as follows:

**Form Interrogatory #50.3:**

Was performance of any agreement alleged in the pleadings excused? If so, identify each agreement excused and state why performance was excused.

**Response to #50.3:**

Plaintiff objects to this discovery request on the grounds that the request asks for a legal conclusion. Subject to and without waiving the foregoing objections, responding party hereby responds as follows: No.

**Form Interrogatory #50.4:**

Was any agreement alleged in the pleadings terminated by mutual agreement, release, accord and satisfaction, or novation? If so, identify each agreement terminated, the date of termination, and the basis of the termination.

**Response to #50.4:**

Plaintiff objects to this discovery request on the grounds that the request asks for a legal conclusion. Subject to and without waiving the foregoing objections, responding party hereby responds as follows: No.

**Form Interrogatory #50.5:**

Is any agreement alleged in the pleadings unenforceable? If so, identify each unenforceable agreement and state why it is unenforceable.

**Response to #50.5:**

Plaintiff objects to this discovery request on the grounds that the request asks for a legal conclusion. Subject to and without waiving the foregoing objections, responding party hereby responds as follows: No.

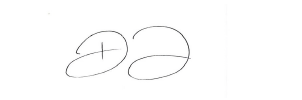
**Form Interrogatory #50.6:**

Is any agreement alleged in the pleadings ambiguous? If so, identify each ambiguous agreement and state why it is ambiguous.

**Response to #50.6:**

Plaintiff objects to this discovery request on the grounds that the request asks for a legal conclusion. Subject to and without waiving the foregoing objections, responding party hereby responds as follows: No.

DATED: %MM #DD, #YYYY THE TENANTS LAW FIRM



|  |
| --- |
| DANIEL LAVI, ESQ  Attorney for Plaintiff PAUL ATREIDES |

**PROOF OF SERVICE**

SUPERIOR COURT OF THE STATE OF CALIFORNIA

IN AND FOR THE COUNTY OF ARRAKEEN

I, the undersigned, hereby declare:

I am a resident of the state of California, over the age of eighteen years and not a party to the within action. My business address is, 9454 Wilshire Blvd., Penthouse, Beverly Hills CA 90212. On %MM #DD, #YYYY, I caused to be served the following document(s):

**PAUL ATREIDES’S RESPONSES TO DEFENDANT’S FORM INTERROGATORIES, SET NO. ONE**

**[ ]** **BY U.S. MAIL:** by placing the document(s) listed above in a sealed envelope with postage thereon fully prepaid, in the United States Mail at Beverly Hills, California addressed as set forth below.

**[XX]** **BY EMAILED SERVICE:** by causing the document(s) to be e-mailed to the person below as agreed to by the parties.

**MICHAEL R. HALVORSEN, ESQ. (SBN 227221)**

**SANDRA L. BLOCK, ESQ. (SBN 225278)**

**KHUSHBOO B. VASANDANI, ESQ. (332841)**

**PHILLIPS, SPALLAS & ANGSTADT LLP**

**11150 W. OLYMPIC BLVD., SUITE 670**

**LOS ANGELES, CA 90064-1839**

**TELEPHONE: (310) 407-3017**

**FACSIMILE: (310) 772-0023**

[**MHALVORSEN@PSALAW.NET**](mailto:MHALVORSEN@PSALAW.NET)

I am readily familiar with the practices of the Tenants Law Firm regarding the collection and processing of correspondence for mailing, overnight delivery and with the use of the business facsimile telecopier machine.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on %MM #DD, #YYYY, at Los Angeles, California.

A black line drawing of a person

Description automatically generated with medium confidence

Justine Jones