**The Tenants Law Firm**

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Attorneys 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’ RESPONSES TO DEFENDANT’S REQUEST FOR PRODUCTION, SET ONE |

PROPOUNDING PARTY: DEFENDANT – FEYD RAUTHA

RESPONDING PARTY: PLAINTIFF – PAUL ATREIDES

SET NUMBER: ONE

**PRELIMINARY STATEMENT**

Plaintiff, PAUL ATREIDES, (hereinafter “Plaintiff” or “Responding Party”) by her undersigned counsel, hereby responds to the Request for Production Propounded by Defendant FEYD RAUTHA, reserving all rights to object to the admission in evidence of any and all the information made available in response to such request for production on any ground, including, but not limited to the ground that such information or any part thereof is irrelevant and immaterial to the issues in this action, and further specifying that these responses are based on information acquired through the date of this response and upon the present state of Plaintiff’s pretrial preparation, that these responses, therefore, are subject to change as Plaintiff acquires additional information and completes his review and analysis of information to be obtained, and that these answers are based upon Plaintiff’s best present information and belief, state:

1. That investigation and discovery in this matter are not complete, and Plaintiff reserves the right to introduce as evidence at trial or other hearing in this action such other and further information and documents which may be discovered in the course of investigation and discovery;
2. That Plaintiff objects in whole or in part to each and every request for production to the extent it is vague, ambiguous, overbroad, immaterial, burdensome, oppressive, irrelevant, or not reasonably calculated to lead to the discovery of admissible evidence, or purports to seek information that is subject to the attorney-client privilege and/or attorney-work product doctrine, or information made confidential by law, including, but not limited to, that which is protected by any constitutional, statutory, or common law privacy interest of the responding party or of any third party (person or entity). Nothing contained herein shall be construed as a waiver of the attorney-client privilege, the attorney work product doctrine, the right of privacy, or any other applicable privilege or doctrine. Moreover, the responding party objects generally to the instant demand as unnecessary, oppressive, and unduly burdensome to the extent that responsive documents are already in the possession, custody, or control of the propounding party or are equally available to them or their attorney.
3. The responses to any individual document demand shall not be construed as an admission by the responding party that any fact or circumstances alleged in or suggested by the demand occurred or existed. Further, these responses shall not be construed as an agreement or concurrence by the responding party with the propounding party’s characterization of any facts or circumstances, or their relevancy to any issue in this litigation.
4. That each of Plaintiff’s responses to this request for identification and production is made subject to these general objections. Plaintiff expressly reserves the right, but is not obligated, to supplement its responses to the extent that it may locate additional responsive information.
5. Without waving the above objections, and specifically reserving them, Plaintiff responds to Defendant’s Request for Production as follows:

**RESPONSES TO REQUESTS FOR PRODUCTION**

**REQUEST NO. 1.:**

**RESPONSE TO REQUEST NO. 1:**

**REQUEST NO. 2.:**

**RESPONSE TO REQUEST NO. 2:**

**REQUEST NO. 3.:**

**RESPONSE TO REQUEST NO. 3:**

**REQUEST NO. 4.:**

**RESPONSE TO REQUEST NO. 4:**

**REQUEST NO. 5.:**

**RESPONSE TO REQUEST NO. 5:**

**REQUEST NO. 6.:**

**RESPONSE TO REQUEST NO. 6:**

**REQUEST NO. 7.:**

**RESPONSE TO REQUEST NO. 7:**

**REQUEST NO. 8.:**

**RESPONSE TO REQUEST NO. 8:**

**REQUEST NO. 9.:**

**RESPONSE TO REQUEST NO. 9:**

**REQUEST NO. 10.:**

**RESPONSE TO REQUEST NO. 10:**

**REQUEST NO. 11.:**

**RESPONSE TO REQUEST NO. 11:**

**REQUEST NO. 12.:**

**RESPONSE TO REQUEST NO. 12:**

**REQUEST NO. 13.:**

**RESPONSE TO REQUEST NO. 13:**

**REQUEST NO. 14.:**

**RESPONSE TO REQUEST NO. 14:**

**REQUEST NO. 15.:**

**RESPONSE TO REQUEST NO. 15:**

**REQUEST NO. 16.:**

**RESPONSE TO REQUEST NO. 16:**

**REQUEST NO. 17.:**

**RESPONSE TO REQUEST NO. 17:**

**REQUEST NO. 18.:**

**RESPONSE TO REQUEST NO. 18:**

**REQUEST NO. 19:**

**RESPONSE TO REQUEST NO. 19:**

**REQUEST NO. 20.:**

**RESPONSE TO REQUEST NO. 20:**

**REQUEST NO. 21.:**

**RESPONSE TO REQUEST NO. 21:**

**REQUEST NO. 22.:**

**RESPONSE TO REQUEST NO. 22:**

**REQUEST NO. 23.:**

**RESPONSE TO REQUEST NO. 23:**

**REQUEST NO. 24.:**

**RESPONSE TO REQUEST NO. 24:**

**REQUEST NO. 25.:**

**RESPONSE TO REQUEST NO. 25:**

**REQUEST NO. 26.:**

**RESPONSE TO REQUEST NO. 26:**

**REQUEST NO. 27.:**

**RESPONSE TO REQUEST NO. 27:**

**REQUEST NO. 28.:**

**RESPONSE TO REQUEST NO. 28:**

**REQUEST NO. 29.:**

**RESPONSE TO REQUEST NO. 29:**

**REQUEST NO. 30.:**

**RESPONSE TO REQUEST NO. 30:**

**REQUEST NO. 31.:**

**RESPONSE TO REQUEST NO. 31:**

**REQUEST NO. 32.:**

**RESPONSE TO REQUEST NO. 32:**

**REQUEST NO. 33.:**

**RESPONSE TO REQUEST NO. 33:**

**REQUEST NO. 34.:**

**RESPONSE TO REQUEST NO. 34:**

**REQUEST NO. 35.:**

**RESPONSE TO REQUEST NO. 35:**

**REQUEST NO. 36.:**

**RESPONSE TO REQUEST NO. 36:**

**REQUEST NO. 37.:**

**RESPONSE TO REQUEST NO. 37:**

**REQUEST NO. 38.:**

**RESPONSE TO REQUEST NO. 38:**

**REQUEST NO. 39.:**

**RESPONSE TO REQUEST NO. 39:**

**REQUEST NO. 40.:**

**RESPONSE TO REQUEST NO. 40:**

**REQUEST NO. 41.:**

**RESPONSE TO REQUEST NO. 41:**

**REQUEST NO. 42.:**

**RESPONSE TO REQUEST NO. 42**

**REQUEST NO. 43.:**

**RESPONSE TO REQUEST NO. 43:**

**REQUEST NO. 44.:**

**RESPONSE TO REQUEST NO. 44:**

**REQUEST NO. 45.:**

**RESPONSE TO REQUEST NO. 45:**

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

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By: Daniel Lavi, Esq.

Attorneys 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’ RESPONSES TO DEFENDANT’S REQUEST FOR PRODUCTION, 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**

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[**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.

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Justine Jones