**The Tenants Law Firm**

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Attorneys for Plaintiff 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 REQUESTS FOR SPECIAL 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 of any statements contained therein, if the answer were given by a witness. All such objections and grounds 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 “RESPONDING PARTY”**). Discovery, investigation, research and analysis are ongoing in this case and may disclose the existence of additional facts, add meaning to known facts, establish entirely new factual or legal contentions, or possibly lead to additions, variations, and changes to these responses. 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 relating to the proof of presently known material facts and to produce all evidence, whenever 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. The preliminary statement is incorporated into each of the responses set forth below.

**GENERAL OBJECTIONS TO 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 protection.
2. **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.
3. **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 and/or propriety information related to **RESPONDING PARTY** and/or third parties.
4. **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.
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 a matter of public record or equally available to the Propounding Party from a third-party.
6. **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, and unduly burdensome and oppressive.

Each of the general objections is by this reference incorporated in full of in each individual response set forth below, and each individual response is made subject to and without waiver of each general objection.

Certain Interrogatories seek the disclosure of information pertaining to the financial condition of **RESPONDING PARTY**, which information is protected from disclosure, inter alia. by the financial information privilege, but the right to privacy, and by the provisions, of the California Constitution, Article 1, Section 1 and California Civil Code 3295, and further, on the grounds that they request information which is neither relevant to the subject matter involved in the pending action nor reasonably calculated to lead to the discovery of admissible evidence. When such items are objected to on these grounds, this objection will be referred to as the “Financial Privilege Objection”.

**RESPONSES TO REQUESTS SPECIAL INTERROGATORIES**

**SPROG NO. 1:**

**RESPONSE TO SPROG NO. 1:**

**SPROG NO. 2:**

**RESPONSE TO SPROG NO. 2:**

**SPROG NO. 3:**

**RESPONSE TO SPROG NO. 3:**

**SPROG NO. 4:**

**RESPONSE TO SPROG NO. 4:**

**SPROG NO. 5:**

**RESPONSE TO SPROG NO. 5:**

**SPROG NO. 6:**

**RESPONSE TO SPROG NO. 6:**

**SPROG NO. 7:**

**RESPONSE TO SPROG NO. 7:**

**SPROG NO. 8:**

**RESPONSE TO SPROG NO. 8:**

**SPROG NO. 9:**

**RESPONSE TO SPROG NO. 9:**

**SPROG NO. 10:**

**RESPONSE TO SPROG NO. 10:**

**SPROG NO. 11:**

**RESPONSE TO SPROG NO. 11:**

**SPROG NO. 12:**

**RESPONSE TO SPROG NO. 12:**

**SPROG NO. 13:**

**RESPONSE TO SPROG NO. 13:**

**SPROG NO. 14:**

**RESPONSE TO SPROG NO. 14:**

**SPROG NO. 15:**

**RESPONSE TO SPROG NO. 15:**

**SPROG NO. 16:**

**RESPONSE TO SPROG NO. 16:**

**SPROG NO. 17:**

**RESPONSE TO SPROG NO. 17:**

**SPROG NO. 18:**

**RESPONSE TO SPROG NO. 18:**

**SPROG NO. 19:**

**RESPONSE TO SPROG NO. 19:**

**SPROG NO. 20:**

**RESPONSE TO SPROG NO. 20:**

**SPROG NO. 21:**

**RESPONSE TO SPROG NO. 21:**

**SPROG NO. 22:**

**RESPONSE TO SPROG NO. 22:**

**SPROG NO. 23:**

**RESPONSE TO SPROG NO. 23:**

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**RESPONSE TO SPROG NO. 24:**

**SPROG NO. 25:**

**RESPONSE TO SPROG NO. 25:**

**SPROG NO. 26:**

**RESPONSE TO SPROG NO. 26:**

**SPROG NO. 27:**

**RESPONSE TO SPROG NO. 27:**

**SPROG NO. 28:**

**RESPONSE TO SPROG NO. 28:**

**SPROG NO. 29:**

**RESPONSE TO SPROG NO. 29:**

**SPROG NO. 30:**

**RESPONSE TO SPROG NO. 30:**

**SPROG NO. 31:**

**RESPONSE TO SPROG NO. 31:**

**SPROG NO. 32:**

**RESPONSE TO SPROG NO. 32:**

**SPROG NO. 33:**

**RESPONSE TO SPROG NO. 33:**

**SPROG NO. 34:**

**RESPONSE TO SPROG NO. 34:**

**SPROG NO. 35:**

**RESPONSE TO SPROG NO. 35:**

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**SPROG NO. 37:**

**RESPONSE TO SPROG NO. 37:**

**SPROG NO. 38:**

**RESPONSE TO SPROG NO. 38:**

**SPROG NO. 39:**

**RESPONSE TO SPROG NO. 39:**

**SPROG NO. 40:**

**RESPONSE TO SPROG NO. 40:**

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**RESPONSE TO SPROG NO. 41:**

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**RESPONSE TO SPROG NO. 42:**

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**RESPONSE TO SPROG NO. 47:**

**SPROG NO. 48:**

**RESPONSE TO SPROG NO. 48:**

**SPROG NO. 49:**

**RESPONSE TO SPROG NO. 49:**

**SPROG NO. 50:**

**RESPONSE TO SPROG NO. 50:**

DATED: TENANTS LAW FIRM

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By: Daniel Lavi, Esq.

Attorneys for Plaintiff PAUL ATREIDES

**VERIFICATION**

I, PAUL ATREIDES, declare as follows:

I am the Plaintiff in the above-entitled action. I have read the Special Interrogatories, Set One, as propounded by defendant Feyd Rautha, as well as the associated responses thereto, and I know the contents thereof: and that the same are true of my own knowledge, belief and recollection, except as to matters stated on information and belief, and as to those matters, I believe them to be true.

I declare under penalty of perjury under the laws of the State of California that the foregoing are true and correct and that this verification was executed on the date affixed adjacent to my signature affixed hereto.

Dated: By:

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 SPECIAL INTERROGATORIES, SET ONE (1)**

**[ ]** **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)**

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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