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SUPERIOR COURT OF THE STATE OF CALIFORNIA  
COUNTY OF SAN DIEGO

LAURA WILLIS-ALBRIGO,

Plaintiff,

vs.

EXECUTIVE WINE BANK, INC. dba THE  
WINESELLAR & BRASSERIE; and DOES 1-  
20,

Defendants.

Case No. 37-2024-00016417-CU-PO-CTL

**PLAINTIFF'S RESPONSES TO DEMAND FOR  
PRODUCTION AND INSPECTION OF  
DOCUMENTS, TANGIBLE THINGS, AND  
OTHER PROPERTY, SET ONE (CCP §  
2031.010, et seq.) AND RELATED CROSS-  
ACTION(S).**

PROPOUNDING PARTY: Defendant, EXECUTIVE WINE BANK, INC. dba THE WINESELLAR  
& BRASSERIE

RESPONDING PARTY: Plaintiff, LAURA WILLIS-ALBRIGO

SET NUMBER: ONE

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLAINTIFF, LAURA WILLIS-ALBRIGO, (hereinafter "Responding Party") makes the  
following answers and objections to the DEMAND FOR PRODUCTION AND INSPECTION OF  
DOCUMENTS, TANGIBLE THINGS, AND OTHER PROPERTY, SET ONE (CCP § 2031.010, et  
seq.) AND RELATED CROSS-ACTION(S)., Set One.

PRELIMINARY STATEMENT

1 Plaintiff's investigation and discovery of the facts relating to this case, and preparation for trial,  
2 are continuing and not complete. All of the responses contained herein are presently available to and  
3 specifically known to this Plaintiff and disclose only those contentions which presently occur to such  
4 Plaintiff. This Plaintiff will, during the course of this litigation, pursue extensive formal discovery, as  
5 well as extensive investigation and informal discovery on her own. Therefore, without suggesting or  
6 implying any interest to respond less than fully to the Demand for Production, this Plaintiff must point  
7 out that her responses are of necessity of a somewhat preliminary nature and that the full factual basis  
8 concerning this matter is yet to be developed with complete precision. However, this Plaintiff assumes  
9 no obligation to voluntarily supplement or amend these responses to reflect any facts, contentions,  
10 witnesses, and evidence which may be discovered following the serving of theses response. The  
11 response contained herein are made in a good faith effort to supply as much factual information and as  
12 much specification of legal contentions as is presently known.

13 **DEMAND NO. 1:**

14 Any and all medical records that pertain to or describe the injuries YOU claim to have sustained  
15 as a result of the INCIDENT that is the subject of this lawsuit, including, but not limited to injury  
16 reports, medical reports, correspondence, notes, memoranda, e-mails, electronic transmissions, referrals  
17 for other treatment, x-rays, MRI's, CT-scans, lab reports, etc.

18 **RESPONSE TO DEMAND:**

19 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

20 **DEMAND NO. 2:**

21 Any and all DOCUMENTS pertaining to any and all medical bills and other expenses, including  
22 out-of-pocket expenses, YOU claim to have incurred, or will incur, as a result of the incident which is  
23 the subject of YOUR lawsuit. / / / PROPERTY, SET ONE (CCP § 2031.010, et seq.)

24 **RESPONSE TO DEMAND:**

25 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

26 **DEMAND NO. 3:**

27 Any and all DOCUMENTS that support YOUR contention that YOU will undergo future medical  
28 treatment as a result of the INCIDENT that is the subject of YOUR lawsuit.

**RESPONSE TO DEMAND:**

CLIENT FEEDBACK: Responding Party will comply with this demand. Please see “” produced concurrently herewith.

**DEMAND NO. 4:**

Any and all photographs and/or videotapes of the location where the INCIDENT occurred, including any photographs of any person, object or thing involved in said INCIDENT and/or located at the scene of said INCIDENT. This Request includes the reverse sides of any photographs if there is any writing on the back of any photographs.

**RESPONSE TO DEMAND:**

CLIENT FEEDBACK: Responding Party will comply with this demand. Please see “” produced concurrently herewith.

**DEMAND NO. 5:**

Any and all DOCUMENTS that support YOUR liability contentions against the Propounding Party.

**RESPONSE TO DEMAND:**

After a diligent search and reasonable inquiry, Responding Party finds no responsive documents in their possession, custody, or control, because no such documents are known to exist.

**DEMAND NO. 6:**

Any and all written or recorded statements obtained from any person who has knowledge of any facts pertaining to the INCIDENT that is the subject of YOUR lawsuit, including but not limited to written or recorded statements from any person who witnessed any portion of said INCIDENT.

**RESPONSE TO DEMAND:**

Responding Party will comply with this demand. Please see “” produced concurrently herewith.

**DEMAND NO. 7:**

Any and all written or recorded statements obtained from Propounding Party or any former or current employee of the Propounding Party.

**RESPONSE TO DEMAND:**

Responding Party will comply with this demand. Please see “” produced concurrently herewith.

1 **DEMAND NO. 8:**

2 Any and all reports and/or DOCUMENTS prepared by any person or entity, including any police  
3 or fire reports, concerning the INCIDENT described in the Complaint.

4 **RESPONSE TO DEMAND:**

5 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

6 **DEMAND NO. 9:**

7 Any and all DOCUMENTS that support YOUR claims of wage loss and/or loss of earning  
8 capacity as a result of the INCIDENT which is the subject of YOUR lawsuit, including but not limited  
9 to records illustrating compensation YOU received during the past three years.

10 **RESPONSE TO DEMAND:**

11 After a diligent search and reasonable inquiry, Responding Party finds no responsive documents  
12 in their possession, custody, or control, any such documents have been destroyed, lost, misplaced or  
13 stolen.

14 **DEMAND NO. 10:**

15 Any and all DOCUMENTS pertaining to YOUR vocational rehabilitation or retraining in any  
16 work capacity as a result of the INCIDENT that is the subject of YOUR lawsuit. / / / PROPERTY, SET  
17 ONE (CCP § 2031.010, et seq.)

18 **RESPONSE TO DEMAND:**

19 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

20 **DEMAND NO. 11:**

21 Any and all receipts for out-of-pocket expenses incurred by YOU as a result of or relating to the  
22 INCIDENT that is the subject of YOUR lawsuit.

23 **RESPONSE TO DEMAND:**

24 Responding Party will comply with this demand. Please see "" produced concurrently herewith.

25 **DEMAND NO. 12:**

26 Any and all DOCUMENTS evidencing each health care provider, as defined by Code of Civil  
27 Procedure section 667.7(e)(3), that YOU saw during the period of five years prior to the date of the  
28

INCIDENT described in YOUR Complaint for any injury or pain in any of the same areas of the body as YOU contend were injured in the subject INCIDENT.

**RESPONSE TO DEMAND:**

Responding Party will comply with this demand. Please see "" produced concurrently herewith.

**DEMAND NO. 13:**

Any and all photographs and/or videotape and/or or other graphic representations reflecting the injuries alleged by YOU as a result of the INCIDENT that is the subject of YOUR lawsuit.

**RESPONSE TO DEMAND:**

Responding Party will comply with this demand. Please see "" produced concurrently herewith.

**DEMAND NO. 14:**

Each writing, as defined by Evidence Code section 250, evidencing all personal injury claims, workers' compensation claims, lawsuits, and/or other demands YOU or anyone acting on YOUR behalf have made due to personal injury within the last ten years, regardless of disposition or lack thereof.

**RESPONSE TO DEMAND:**

Responding Party will comply with this demand. Please see "" produced concurrently herewith.

**DEMAND NO. 15:**

Each writing, as defined by Evidence Code section 250, evidencing compensation and/or services/benefits received by YOU or anyone acting on YOUR behalf from any source that relates to the INCIDENT described in the Complaint, including but not limited to workers' compensation payments, medical care, and/or other benefits.

**RESPONSE TO DEMAND:**

Responding Party will comply with this demand. Please see "" produced concurrently herewith.

**DEMAND NO. 16:**

Any and all lien statements, correspondence, notes or billings relative to medical treatment received a result of the subject INCIDENT which were generated or produced by Medicare, Medi-Cal, and/or any other health care entity, billing service or third party administrator.

**RESPONSE TO DEMAND:**

Responding Party will comply with this demand. Please see "" produced concurrently herewith.

**DEMAND NO. 17:**

Any and all DOCUMENTS identified by YOU in response to the Form Interrogatories served concurrently herewith. / / / PROPERTY, SET ONE (CCP § 2031.010, et seq.) TEST

**RESPONSE TO DEMAND:**

Objection. Intended to harass and annoy. This Interrogatory is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. This interrogatory seeks private information. A party's social security number is "clearly irrelevant to the subject matter of the action." (Smith v. Superior Court of San Joaquin County (1961) 189 Cal.App.2d 6, 9, 13, [11 Cal.Rptr. 165, 168, 170].). Notwithstanding the foregoing objections and subject thereto, Responding Party responds as follows: After a diligent search and reasonable inquiry, Responding Party finds no responsive documents in their possession, custody, or control, any such documents have been destroyed, lost, misplaced or stolen. Any responsive documents are believed to be in the possession, custody, or control of location.

**DEMAND NO. 18:**

Any and all DOCUMENTS identified by YOU in response to the Special Interrogatories served concurrently herewith.

**RESPONSE TO DEMAND:**

Responding Party will comply with this demand. Please see "" produced concurrently herewith.

**DEMAND NO. 19:**

Any and all DOCUMENTS relating to any food or drink order placed by you or anyone you dined with on December 23, 2023 at the subject restaurant (such as checks, receipts, statements, notes, photographs, reviews).

**RESPONSE TO DEMAND:**

Responding Party will comply with this demand. Please see "" produced concurrently herewith.

Dated: COHEN LAW PARTNERS

By: \_\_\_\_\_  
Darren A. Reid  
Attorneys for Plaintiff