



1 and any other objections and grounds that would require the exclusion of any statement herein if  
2 any document was asked of, or if any statement contained therein were made by a witness present  
3 and testifying in court, all of which objections and grounds are reserved and may be interposed at  
4 the time of trial.

5  
6 Plaintiff is responding to all Requests to the extent that information has become known  
7 by him. However, this Responding Party's discovery, investigation and preparation for trial of  
8 this matter has not been completed as of the date of these responses, and, therefore, Plaintiff does  
9 not purport to state anything more than information presently known and discovered by him.

10  
11 Plaintiff, in responding to these Requests, reserves the right to continue discovery and  
12 investigation in this matter for facts, witnesses and supporting data that may recall information  
13 which, if he had presently within his knowledge, would be included in these responses. For  
14 example, to the extent that any request calls for the identification of "all documents," it is  
15 responded to fully insofar as information is presently available to Plaintiff, and Plaintiff is not  
16 precluded from presenting at trial information discovered after the date of the response of this  
17 request.

18  
19 This preliminary statement is incorporated into each of the responses set forth below.

## 20 **GENERAL OBJECTIONS**

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22 To avoid repetition in setting forth specific objections to interrogatories, Responding Party  
23 sets forth and incorporates the following objections to Responding Party's each and every  
24 response.

### 25 **A. RELEVANCY OBJECTION**

26  
27 Responding Party objects on the basis that the interrogatory, in whole or in part, seek the  
28 disclosure of information that is neither relevant to the subject matter of the action nor reasonably

1 calculated to lead to the discovery of admissible evidence.

2 B. CONFIDENTIALITY/PRIVACY OBJECTION

3 Responding Party objects on the basis that the interrogatory seeks the disclosure of confidential  
4 information and constitutes an attempt to invade the personal and/or financial privacy of certain  
5 individuals or persons.  
6

7 C. OVERBREADTH AND BURDEN OBJECTION

8 Responding Party objects on the basis that the interrogatory is overbroad, burdensome and  
9 oppressive in that they seek the disclosure of information that has little or no practical benefit to  
10 Propounding Party while placing an unwarranted burden or expense on the Responding Party in  
11 ascertaining such information. Further, such interrogatory is so broadly drawn that although it  
12 may include some relevant information within its scope, it includes information that is irrelevant  
13 or immaterial to the instant action. Such interrogatory seeks information which is cumulative  
14 and/or would require the compilation of extensive and detailed information from numerous  
15 potential sources, many of which is not easily identifiable or available. A search for all such  
16 information will in many instances involve enormous amounts of time by Responding Party.  
17 Further, the interrogatory is so overbroad such that it is uncertain what information is sought.  
18  
19

20 D. AMBIGUITY OBJECTION

21 Responding Party objects on the basis that the interrogatory is phrased in language that is  
22 vague, ambiguous, and uncertain such that Responding Party is unable to ascertain what  
23 information is sought and in order to respond to this interrogatory, Responding Party would have  
24 to speculate as to Propounding Party's intended meaning.  
25  
26

27 E. AVAILABILITY OBJECTION

28 Responding Party objects on the basis that the interrogatory is equally accessible to all parties

1 or is more accessible to the Propounding Party or which is maintained primarily by persons or  
2 entities other than Responding Party.

3 F. IMPROPER FORM OBJECTION  
4

5 Responding Party objects on the basis that the interrogatory is phrased in improper form  
6 because the interrogatory is not “full and complete in and of itself”; or because it contains subpart,  
7 “compound, conjunctive or disjunctive” question, such that the interrogatory does not comply with  
8 the requirements of *California Code of Civil Procedure* §2030.060  
9

10 G. LEGAL CONCLUSION OBJECTION

11 Responding Party objects on the basis that the interrogatory calls for a legal conclusion.

12 H. ATTORNEY WORK-PRODUCT OBJECTION

13 Responding Party objects on the basis that the interrogatory, in whole or in part, seeks  
14 disclosure of information that is protected under the attorney work-product doctrine.  
15

16 I. MARITAL PRIVILEGE OBJECTION

17 Responding Party objects on the basis that the request, in whole or in part, seeks disclosure of  
18 information that is protected under marital privilege.  
19

20 **RESPONSES TO FORM INTERROGATORIES (SET ONE)**

21 **FORM INTERROGATORY 70.1**

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23 91204; (818) 839-52520

24 **FORM INTERROGATORY 70.2**

25 Yes. Responding Party exercises its right to produce writings under Code of Civil  
26 Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional  
27 discovery and further investigation, legal research and analysis will supply additional facts and  
28

1 provide new and different meaning to known facts, and may establish new factual conclusions  
2 and legal contentions, all of which may result in additional changes and/or variations from the  
3 responses set herein and Responding Party reserves the right to supplement this response at a  
4 later time as appropriate, up to and including at trial.  
5

6 FORM INTERROGATORY 70.3

7 Yes. Responding Party exercises its right to produce writings under Code of Civil  
8 Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional  
9 discovery and further investigation, legal research and analysis will supply additional facts and  
10 provide new and different meaning to known facts, and may establish new factual conclusions  
11 and legal contentions, all of which may result in additional changes and/or variations from the  
12 responses set herein and Responding Party reserves the right to supplement this response at a  
13 later time as appropriate, up to and including at trial.  
14

15 FORM INTERROGATORY 70.4

16 No.  
17

18 FORM INTERROGATORY 70.5

19 No.  
20

21 FORM INTERROGATORY 70.6

22 No.  
23

24 FORM INTERROGATORY 70.7

25 Yes. Responding Party exercises its right to produce writings under Code of Civil  
26 Procedure Section 2030.210(a)(2). Discovery is ongoing and it is anticipated that additional  
27 discovery and further investigation, legal research and analysis will supply additional facts and  
28 provide new and different meaning to known facts, and may establish new factual conclusions