

EXHIBIT D

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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **(WESTERN DIVISION – LOS ANGELES)**

11 Lucine Trim, *et al.*,

12 Plaintiffs,

13 v.

14 John C. Heath Attorney at Law, PC
15 d/b/a Lexington Law Firm,

16 Defendant.

Case No. 2:20-cv-02161-SVW-MRW

**DEFENDANT JOHN C. HEATH
ATTORNEY AT LAW, PC D/B/A
LEXINGTON LAW FIRM'S
RESPONSES TO PLAINTIFFS' FIRST
SET OF REQUESTS FOR THE
PRODUCTION OF DOCUMENTS
AND FOR THE INSPECTION OF
TANGIBLE THINGS**

21 Defendant John C. Heath Attorney at Law, PC d/b/a Lexington Law Firm
22 (“Lexington”), by counsel, submits the following responses to Plaintiffs’ First Set
23 of Requests for the Production of Documents and for the Inspection of Tangible
24 Things.
25
26
27
28

1
2 **Document Request No. 6:** All Documents sufficient to Identify the Dialing
3 Equipment used to make the calls to Plaintiffs, including all software and hardware
4 components.

5
6 **Response:** Lexington objects to the extent the phrases “the calls” and “all
7 software and hardware components” are vague and ambiguous.

8 Subject to and without waiving the foregoing objections, Lexington responds
9 as follows: *see* LEXLAW_TRIM000003–LEXLAW_TRIM001042.

10
11 **Document Request No. 7:** All Documents supporting Your assertion, if
12 any, that Plaintiffs are inadequate to serve as Class Representatives.

13
14 **Response:** Lexington objects to this Document Request to the extent that it
15 seeks information protected by the attorney-client privilege, the attorney work-
16 product doctrine, or any other applicable rule of privilege, immunity or
17 confidentiality provided by law. Lexington objects to this Interrogatory to the
18 extent that it is premature because discovery is ongoing. Lexington expressly
19 reserves its right to supplement its response to this Interrogatory.

20 Subject to and without waiving the foregoing objections, Lexington responds
21 as follows: none.

22
23 **Document Request No. 8:** All Documents supporting Your assertion, if
24 any, that Plaintiff's attorneys are inadequate to serve as Class Counsel.

25
26 **Response:** Lexington objects to this Document Request to the extent that it
27 seeks information protected by the attorney-client privilege, the attorney work-
28 product doctrine, or any other applicable rule of privilege, immunity or

1 confidentiality provided by law. Lexington objects to this Interrogatory to the
2 extent that it is premature because discovery is ongoing. Lexington expressly
3 reserves its right to supplement its response to this Interrogatory.

4 Subject to and without waiving the foregoing objections, Lexington responds
5 as follows: none.

6
7 **Document Request No. 9:** Copies of any subpoenas You cause to be issued
8 or served in the case together with proofs of service, if any, and any responsive
9 materials received.

10
11 **Response:** None.

12
13 **Document Request No. 10:** The sworn or unsworn statements of any
14 witnesses.

15
16 **Response:** Lexington objects to the extent this Document Request is
17 generally vague and ambiguous.

18 Subject to and without waiving the foregoing objections, Lexington responds
19 as follows: none.

20
21 **Document Request No. 11:** All Documents sufficient to Identify any
22 policies, practices, procedures, or any other steps You have caused to be taken to
23 ensure compliance with the TCPA or any telemarketing rules or regulations.

24
25 **Response:** Lexington objects to this Document Request to the extent that the
26 phrase “any telemarketing rules or regulations” is vague and ambiguous. Lexington
27 further objects to the extent this Document Request is overbroad, not proportional
28 to the needs of this case, and seeks documents not relevant to any party’s claims or