

# **EXHIBIT B**

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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**

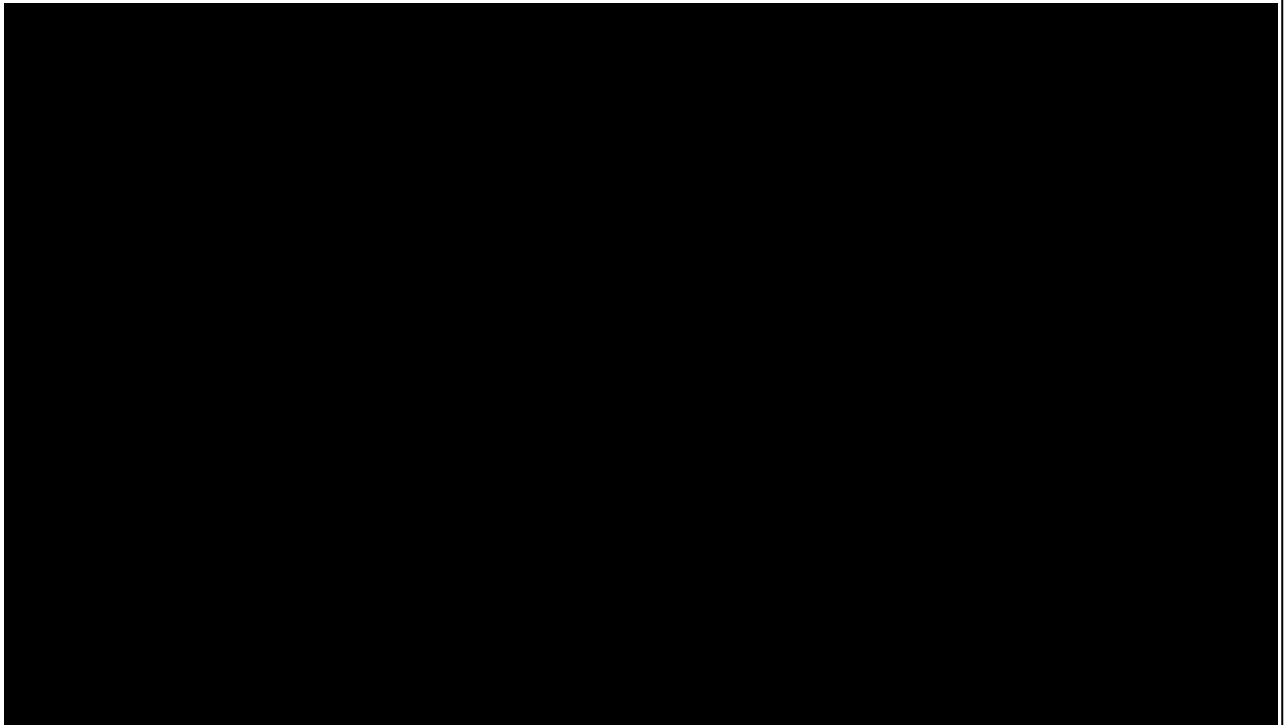
21 Defendant John C. Heath Attorney at Law, PC d/b/a Lexington Law Firm  
22 (“Lexington”), by counsel, submits the following responses to Plaintiffs’ First Set  
23 of Requests for the Production of Documents and for the Inspection of Tangible  
24 Things.  
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2       **Response:** Lexington objects to this Document Request to the extent that it  
3 seeks information protected by the attorney-client privilege, the attorney work-  
4 product doctrine, or any other applicable rule of privilege, immunity or  
5 confidentiality provided by law. Lexington objects to this Document Request to the  
6 extent it did not call Plaintiff Anthony Frey on May 4, 2018, as alleged in  
7 Plaintiffs' Complaint.

8       Subject to and without waiving the foregoing objections, Lexington responds  
9 as follows:       *see*     LEXLAW\_TRIM000001–LEXLAW\_TRIM000002,  
10 LEXLAW\_TRIM001087.

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12       **Document Request No. 4:** All Documents sufficient to Identify all persons  
13 who You (or a third-party acting on Your behalf or for Your benefit) caused to be  
14 called on their cellphones using the same equipment that was used to call Plaintiffs  
15 where prior express consent to call the person was obtained in the same manner as  
16 You claim prior express consent was obtained to call Plaintiff [sic].

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18       **Response [CONFIDENTIAL]:**   
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13       **Document Request No. 5:** All Documents sufficient to Identify any third  
14 part(ies) from or through whom You obtained Lead Information regarding the  
15 Plaintiffs together with Your complete contract or other arrangement or agreement  
16 with any third part(ies) from or through whom You obtained Lead Information  
17 regarding the Plaintiff.

18  
19       **Response:** Lexington objects to this Document Request to the extent that the  
20 phrase “other arrangement or agreement” is vague and ambiguous. Lexington  
21 further objects to the extent this Document Request is overbroad and seeks  
22 documents not relevant to any party’s claims or defenses. Lexington further objects  
23 to the extent this Document Request calls for confidential and/or private  
24 information relating to third parties. Lexington objects to the extent the request  
25 calls for documents that contractually require a third party’s consent prior to  
26 production.

27       Subject to and without waiving the foregoing objections, Lexington responds  
28 as follows: *see* LEXLAW\_TRIM001043–LEXLAW\_TRIM001050.