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Attorneys for Defendant, USA WATER POLO

**SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
**COUNTY OF ORANGE, CENTRAL JUSTICE CENTER**

JANE CH DOE, by and through her Guardian  
*ad litem* JANE BN DOE,

Plaintiff,

v.

ANAHEIM UNION HIGH SCHOOL  
DISTRICT, a local public entity;  
INTERNATIONAL WATER POLO CLUB, a  
business entity of form unknown; USA  
WATER POLO, a business entity of form  
unknown; BAHRAM HOJREH, an individual;  
DEAN WANG, an individual; DAVID  
JANKOWSKI, an individual, and DOES 1  
through 100,

Defendants.

Case No. 30-2019-01065534-CU-PO-CJC  
(Related with Case Nos. 30-2018-01015964-  
CU-PO-CJC; 30-2019-0105142-CU-PO-CJC;  
30-2019-01061535-CU-PO-CJC; 30-2019-  
01066132-CU-PO-CJC; 30-2019-01076040-  
CU-PO-CJC; 30-2019-01097883-CU-PO-  
CJC; 30-2020-01129862-CU-PO-CJC)

[Assigned For All Purposes To:  
Hon. Randall J. Sherman / Department  
CX105]

**DEFENDANT, USA WATER POLO'S  
REQUESTS FOR PRODUCTION TO  
PLAINTIFF JANE CH DOE, SET TWO**

Action Filed: April 22, 2019  
Trial Date: None

PROPOUNDING PARTY: Defendant, USA WATER POLO

RESPONDING PARTY: Plaintiff, JANE CH DOE, by and through her Guardian *ad litem*  
JANE BN DOE

SET NO.: TWO (2)

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Defendant USA WATER POLO hereby requests that Plaintiff JANE CH DOE, by and through her Guardian ad litem JANE BN DOE provide verified responses to each of the following Requests for Production, within 30 days of the date of service, pursuant to *Code of Civil Procedure* section 2031.010, et seq.

### INSTRUCTIONS

It is not the Defendant's intention to request production of privileged matter. If any of the requested materials are claimed to be privileged, please list the following for each item claimed to be privileged:

1. A brief description of the nature and contents of the matter claimed to be privileged;
2. The name, occupation and capacity of the individual from whom the allegedly privileged matter emanated;
3. The name, occupation and capacity of the individual from whom the allegedly privileged matter was directed;
4. The date borne by the item, if the item bears no date, the approximate date it initially appeared; and
5. The nature and extent of each privilege claimed.

### DEFINITIONS

1. The term "WRITINGS" refers to any writing as that term is defined in *Evidence Code* § 250 or *Code of Civil Procedure* § 2016.020, including any information fixed in any tangible medium or expression from which such information can be perceived, reproduced or otherwise communicated, either directly or indirectly with the aid of a machine or device, including, without limitation, memoranda, notes, correspondence, medical records, slides, diaries, books, photographs, tapes or other recordings, electronic mail, punch cards, magnetic tapes, disks, data cells, drums, printouts, text messages and other data compilations from which information can be obtained together with instructions and code by which these items can be translated into usable form, both electronic and documentary.

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1           2.       The terms "YOU" and "YOUR" shall refer to Plaintiff JANE CH DOE.

2           3.       The term "DEFENDANT" shall refer to Defendant USA WATER POLO.

3                               **REQUESTS FOR PRODUCTION**

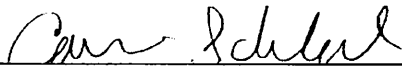
4       **REQUEST FOR PRODUCTION NO. 31:**

5           Produce all WRITINGS identified in YOUR responses to Defendant's Special  
6 Interrogatories, Set Two, served concurrently herewith.

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8 Dated: June 26, 2020

CLYDE & CO US LLP

9 By:



10 Margaret M. Holm

11 Cameron J. Schlagel

12 Attorneys for Defendant, USA WATER POLO

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At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Orange, State of California. My business address is 2020 Main Street, Suite 1100, Irvine, CA 92614.

**SEE ATTACHED SERVICE LIST**

**BY MAIL:** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Clyde & Co US LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Irvine, California.

Executed on June 26, 2020 at Downey, California.

Lorraine Gallo  
Lorraine Gallo

**SERVICE LIST**

***Jane CH Doe, et al. v. Anaheim Union High School District, et al.***

**O.C.S.C. Case No.: 30-2019-01065534-CU-PO-CJC**

***(Related with Case Nos. 30-2018-01015964-CU-PO-CJC; 30-2019-0105142-CU-PO-CJC; 30-2019-01061535-CU-PO-CJC; 30-2019-01066132-CU-PO-CJC; 30-2019-01076040-CU-PO-CJC; 30-2019-01097883-CU-PO-CJC; 30-2020-01129862-CU-PO-CJC)***

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