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Attorney for>

SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO, CENTRAL DIVISION

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| >,  Plaintiff,  v.  >,  Defendant. | Case No. >  Reservation Number: 3018765  Judge: >  Dept.: >  BONNIE GAY’S SEPARATE STATEMENT IN SUPPORT OF HER MOTION FOR ORDERS: (1) COMPELLING NANCY ABDOU TO PROVIDE FURTHER RESPONSES, WITHOUT A PRELIMINARY STATEMENT OR GENERAL OBJECTIONS, TO SPECIAL INTERROGATORIES (SET ONE); and, (2) MONETARY SANCTIONS AGAINST NANCY ABDOU AND/OR ATTORNEY SETH BOBROFF  Hearing Date: 01/19/2023  Hearing Time: 1:30 pm  Filing Date: >  Trial Date:  > |

Pursuant to California Rules of Court, Rule 3.1345 and California Code of Civil Procedure (“C.C.P.”) § 2030.300 *et seq.*, plaintiff > respectfully submits the following separate statement in support of her motion to compel further responses to Defendant Nancy Abdou’s Response to Plaintiff Bonnie Gay’s Special Interrogatories (Set One)(“SROG1”). Nos. 4 and 6.

SEPARATE STATEMENT

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| FROG-E1, NO. 201.1 | RESPONESE TO FROG-E1, NO. 201.1 |
| Was the EMPLOYEE involved in a TERMINATION? If so:   1. state all reasons for the EMPLOYEE’S TERMINATION; 2. state the name, ADDRESS, and telephone number of each PERSON who provided any information relied upon in the TERMINATION decision; and 3. state the name, ADDRESS, and telephone number of each PERSON who provided any information relied upon in the TERMINATION decision; and 4. identify all DOCUMENTS relied upon in the TERMINATION decision. | On information and belief, yes. Discovery and investigation are ongoing. |

REASONS WHY FURTHER RESPONSES SHOULD BE COMPELLED:

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| FROG-E1, NO. 201.4 | RESPONESE TO FROG-E1, NO. 201.4 |
| Was the TERMINATION or any other ADVERSE EMPLOYMENT ACTION referred to in Interrogatories 201.1 through 201.3 based in whole or in part on the EMPLOYEE’S job performance? If so, for each action:   1. identify the ADVERSE EMPLOYMENT ACTION; 2. identify the EMPLOYEE’S specific job performance that played a role in that ADVERSE EMPLOYMENT ACTION; 3. identify any rules, guidelines, policies or procedures that were used to evaluate the EMPLOYEE’S specific job performance; 4. state the name, ADDRESS, and telephone numbers of all PERSONS who had a responsibility for evaluating the specific job performance of the EMPLOYEE; 5. state the name, ADDRESS, and telephone numbers of all PERSONS who have knowledge of the EMPLOYEE’S specific job performance that played a role in the ADVERSE EMPLOYMENT ACTION; and 6. describe all warnings given with respect to the EMPLOYEE’S specific job performance. | On information and belief, yes. Discovery and investigation are ongoing. |

REASONS WHY FURTHER RESPONSES SHOULD BE COMPELLED:

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| --- | --- |
| FROG-E1, NO. 201.5 | RESPONESE TO FROG-E1, NO. 201.5 |
| Was any PERSON hired to replace the EMPLOYEE after the EMPLOYEE’S TERMINATION or demotion? If so, state the PERSON’S name, job title, qualifications, ADDRESS and telephone number, and the date the PERSON was hired. | On information and belief, yes. Discovery and investigation are ongoing. |

REASONS WHY FURTHER RESPONSES SHOULD BE COMPELLED:

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| FROG-E1, NO. 201.6 | RESPONESE TO FROG-E1, NO. 201.6 |
| Has any PERSON performed any of the EMPLOYEE’S former job duties after the EMPLOYEE’S TERMINATION or demotion?   1. state the PERSONS name, job title, ADDRESS, and telephone number; 2. identify the duties; and 3. state the date on which the PERSON started to perform the duties. | On information and belief, yes. Discovery and investigation are ongoing. |

REASONS WHY FURTHER RESPONSES SHOULD BE COMPELLED:

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| FROG-E1, NO. 216.1 | RESPONESE TO FROG-E1, NO. 216.1 |
| Identify each denial of a material allegation and each special or affirmative defense in your PLEADINGS and for each:   1. state all facts upon which you base your denial or special affirmative defense; 2. state the names, ADDRESSES, and telephone numbers of all PERSONS who have knowledge of those facts; and 3. identify all DOCUMENTS and all other tangible things, that support your denial or special or affirmative defense, and state the name, ADDRESS, and telephone number of the PERSON who has each DOCUMENT. | Responding Party has generally denied each and every allegation set forth in the Complaint and set forth various affirmative defenses to properly reserve its rights to do so. Further, all of Responding Party’s denials and affirmative defenses are pled so that they would not be waived, and with the belief that facts, evidence, and expert findings, opinions and documentation may come to light during discovery in this case to support such affirmative defenses. At this time, Responding Party does not have sufficient knowledge or information to fully respond to this interrogatory, as discovery has only just begun, and has not yet been completed. Responding Party reserves the right, without undertaking an affirmative duty to do so, to revise this response at a later date. |

REASONS WHY FURTHER RESPONSES SHOULD BE COMPELLED:

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| FROG-E1, NO. 217.1 | RESPONESE TO FROG-E1, NO. 217.1 |
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REASONS WHY FURTHER RESPONSES SHOULD BE COMPELLED:

LAW OFFICE OF ZACHARY T. TYSON

Dated: September 7, 2023

By: \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

Zachary T. Tyson

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