1 2 3 4	R. Paul Katrinak, State Bar No. 164057 LAW OFFICES OF R. PAUL KATRINAK 9663 Santa Monica Blvd., 458 Beverly Hills, California 90210 Telephone: (310) 990-4348 Facsimile: (310) 921-5398	Electronically FILED by Superior Court of California, County of Los Angeles 6/17/2024 12:00 AM David W. Slayton, Executive Officer/Clerk of Court, By L. Lane, Deputy Clerk			
5	Attorneys for Defendant Michael Pierattini				
6					
7	SUPERIOR COURT OF THE STATE OF CALIFORNIA				
8	FOR THE COUNTY OF LOS ANGELES				
9	JOSE DECASTRO,) Case No. 23SMCV00538			
10		ý l			
11	Plaintiff,	 Assigned for all purposes to the Honorable H. Jay Ford III, Dept. O 			
12) DECLARATION OF R. PAUL KATRINAK			
13	KATHERINE PETER; DANIEL CLEMENT; MICHAEL PIERATTINI; DAVID OMO JR.;	 RE HEARING ON MOTION TO COMPEL DEPOSITION OF PLAINTIFF 			
14	and DOES 1 TO 30, inclusive,) Date: June 18, 2024			
15	Defendants.) Time: 8:30 a.m.) Dept: O			
16)			
17					
18					
19					
20					
21					
22					
23					
24					
25					
26					
27					
28					

LAW OFFICES OF R. PAUL KATRINAK 9663 Santa Monica Blvd., Suite 458 Beverly Hills, California 90210 (310) 990-4348

1

2

DECLARATION OF R. PAUL KATRINAK

I, R. Paul Katrinak, declare as follows:

I am an attorney duly licensed to practice law before all courts of the State of
 California. My law firm is counsel for Defendant Michael Pierattini ("Mr. Pierattini") in this
 action. The following facts are within my personal knowledge and, if called as a witness herein, I
 can and will competently testify thereto.

I am submitting this declaration because I am unable to attend the hearing on this
matter on June 18, 2024 at 8:30 a.m. regarding Defendant's Motion to Compel the Deposition of
Plaintiff. I am engaged in a Federal Trial in Riverside, California entitled *Harvest Aid, LLC v. Steven Paul, et al.* case no. 21-cv-04154-SSS-KS. Trial started on June 17, 2024. I have to report
at 8:30 a.m. I apologize to the Court for not being able to attend and will have an appearance
attorney appear for me.

3. I have not received any discovery responses from Plaintiff as ordered by the Court.
I have not received the sanction payment from Plaintiff as ordered by the Court. I have had zero
communications from Plaintiff and have no idea what is going on with Plaintiff.

4. Defendant respectfully requests that the Court order the deposition of Plaintiff to
take place within 30 days and award sanctions in the amount of \$4,560.00 as requested.

5. Also, due to the failure of the Plaintiff to comply with the Court's Orders and failure
to appear, Defendant respectfully requests that the Court set an Order to Show Cause re Dismissal.
Plaintiff is ignoring this case and has run up the attorney's fees for Defendant.

6. Again, I apologize to the Court for not being able to attend.

I declare under penalty of perjury under the laws of the State of California that the

²³ foregoing is true and correct. Executed by me this 16th day of June, 2024 in Los Angeles,

24 California.

25

26

27

28

21

22

R. Paul Karrinak

1 DECLARATION OF R. PAUL KATRINAK

1				
1	PROOF OF SERVICE			
2	STATE OF CALIFORNIA COUNTY OF LOS ANGELES			
3	I am employed in the County of Los Angeles, State of California; I am over the age of			
4 5	18 and not a party to the within action; my business address is 9663 Santa Monica Boulevard, Suite 458, Beverly Hills, California 90210.			
5	On June 16, 2024, I served the foregoing document(s) described as:			
7	DECLARATION OF R. PAUL KATRINAK RE HEARING ON MOTION TO COMPEL DEPOSITION OF PLAINTIFF			
8	on the interested parties to this action addressed as follows:			
9	Jose DeCastro 3909 S Maryland Pkwy, Ste. 314 Las Vegas, NV 89119 chille@situationcreator.com			
10				
11				
12	(BY MAIL) I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid and addressed to the person above.			
13				
14	(BY PERSONAL SERVICE) by causing a true and correct copy of the above documents to be hand delivered in sealed envelope(s) with all fees fully paid to the person(s) at the address(es) set forth above.			
15 16	\underline{X} (BY EMAIL) I caused such documents to be delivered via electronic mail to the email address for counsel indicated above.			
17	Executed June 16, 2024, at Los Angeles, California.			
18	I declare under penalty of perjury under the laws of the United States that the above is			
19	true and correct.			
20	SHT2			
21	R. Paul Karinak			
22				
23				
24				
25 26				
20 27				
28				