

DECLARATION OF R. PAUL KATRINAK

I, R. Paul Katrinak, declare as follows:

1. 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.

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



R. Paul Katrinak

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA
3 COUNTY OF LOS ANGELES

4 I am employed in the County of Los Angeles, State of California; I am over the age of
5 18 and not a party to the within action; my business address is 9663 Santa Monica Boulevard,
6 Suite 458, Beverly Hills, California 90210.

7 On June 16, 2024, I served the foregoing document(s) described as:

8 **DECLARATION OF R. PAUL KATRINAK RE HEARING ON MOTION TO
9 COMPEL DEPOSITION OF PLAINTIFF**

10 on the interested parties to this action addressed as follows:

11 Jose DeCastro
12 3909 S Maryland Pkwy, Ste. 314
13 Las Vegas, NV 89119
14 chille@situationcreator.com

15 (BY MAIL) I deposited such envelope in the mail at Los Angeles, California.
16 The envelope was mailed with postage thereon fully prepaid and addressed to the person
17 above.

18 (BY PERSONAL SERVICE) by causing a true and correct copy of the above
19 documents to be hand delivered in sealed envelope(s) with all fees fully paid to the person(s) at
20 the address(es) set forth above.

21 X (BY EMAIL) I caused such documents to be delivered via electronic mail to the
22 email address for counsel indicated above.

23 Executed June 16, 2024, at Los Angeles, California.

24 I declare under penalty of perjury under the laws of the United States that the above is
25 true and correct.

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R. Paul Katrinak