

1 **LESOWITZ GEBELIN LLP**  
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3 steven@lawbylg.com  
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5 Beverly Hills, CA 90211  
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Electronically FILED by  
Superior Court of California,  
County of Los Angeles  
1/22/2025 8:05 PM  
David W. Slayton,  
Executive Officer/Clerk of Court,  
By J. Hernandez, Deputy Clerk

8 Attorneys for Plaintiff Jose DeCastro

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF LOS ANGELES, SANTA MONICA COURTHOUSE**

11 JOSE DECASTRO,

12 Plaintiff,

13 V.

14 KATHERINE PETER; DANIEL  
15 CLEMENT; MICHAEL PIERATTINI;  
16 DAVID OMO JR.; and DOES 1 TO 30,  
17 inclusive,

18 Defendants.

Case No.: 23SMCV00538

Assigned for all Purposes to  
*Hon. H. Jay Ford III*, Department O

**DECLARATION OF STEVEN GEBELIN IN  
SUPPORT OF PLAINTIFF JOSE  
DECASTRO'S OPPOSITION TO  
DEFENDANT MICHAEL PIERATTINI'S  
MOTION FOR SANCTIONS, INCLUDING A  
REQUEST FOR MONETARY SANCTIONS  
AGAINST PLAINTIFF IN THE SUM OF  
\$4,560.00**

Date: January 23, 2025  
Time: 8:30 A.M.  
Dept: O

**DECLARATION OF STEVEN T. GEBELIN**

I, Steven T. Gebelin, declare as follows:

1. I am an attorney at law, a member of the State Bar of California, currently a partner with the law firm of Lesowitz Gebelin LLP, and counsel of record for Plaintiff Jose DeCastro (“DeCastro” or “Plaintiff”) in this action. Except where specifically supported by citation to other documents, I have personal knowledge of the matters stated in this declaration and could competently testify to them if called as a witness.

2. I filed a Substitution of Counsel and formally appeared in place of Plaintiff (who was previously in pro per) as counsel for Mr. DeCastro in this action on June 21, 2024. At the time, Mr. DeCastro was incarcerated in Nevada, and my ability to communicate with him was limited.

3. Following my retention as counsel in the matter, I reviewed the court docket and became aware of two prior orders on discovery motions issued by the Court against DeCastro. First was a Minute Order dated March 7, 2024 and followed by a prepared order issued April 4, 2024 requiring DeCastro to “provide complete responses to Form Interrogatories within 30 days.” Second was a May 2, 2024 minute order that required Plaintiff to “Serve full and complete responses, without objections, to request for admission nos. 22, 23, 24, 25, 26, 27, 37, 38, 40, 41, 42, 43, 44, 45, 46, 47, 48, 49, 50, 51, 52, 54, 55, 56, 57, 58, 59, 61, 62, 63, 64, 65, 66, 67 trauma 68, 69, 70, 71 2072, 73, 74, 75 and 76 within 30 days”, answer “Form Interrogatory No. 17.1 for any request that was denied”, “Serve full and complete responses, without objections, to Special Interrogatory nos. 1 through 27 withing 30 days”, and “Serve full and complete responses, without objections, to request for production of documents nos. 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 18, and 19 within 30 days.”

4. Each of these discovery orders were issued more than 30 days prior to my retention and appearance as counsel for Plaintiff, such that Plaintiff’s full compliance with the issued orders would have required him to provide the supplemental written discovery responses before I entered the case.

5. At no point have I advised Plaintiff to disobey the Court’s discovery orders requiring supplemental responses to Defendant Pierattini’s written discovery. Indeed, it would have been

1 impossible for me to advise Plaintiff to misuse the discovery process by failing to timely comply  
2 with the orders requiring supplemental discovery responses prior to my retention and appearance  
3 as counsel for Mr. DeCastro.

4 6. Relatedly, but not at issue in this motion, I have agreed (more than once) on Plaintiff's  
5 behalf to take his court ordered deposition off calendar at the request of Defendant Pierattini's  
6 counsel, Mr. Katrinak. Specifically, Mr. Katrinak asked to cancel the scheduled deposition to  
7 accommodate his schedule, and we agreed to potentially reschedule it at a later date to be agreed  
8 upon by both sides. As documented in my email exchange with Mr. Katrinak, a true and correct  
9 copy of which is attached hereto as **Exhibit 1**) he and I were unable to discuss or schedule that  
10 deposition (or his issues with outstanding discovery to ensure defendant received all necessary  
11 discovery responses) prior to his filing the instant motion for sanctions on Defendant's behalf. As  
12 is clear from the email chain, rather than Mr. Katrinak rescheduling a call he cancelled in which  
13 we were meant to discuss the deposition **and outstanding discovery issues**, he filed the instant  
14 motion without advance notice or warning.

15 7. On Plaintiff's behalf, on January 22, 2025, I served the following supplemental responses  
16 required by the Court's orders referenced above that were completed by Plaintiff:

- 17 a. Plaintiff Jose DeCastro's Supplemental Responses To Defendant Michael  
18 Pierattini's Requests For Production Of Documents, Set One [with production of  
19 documents] (a true and correct copy of which is attached hereto as **Exhibit 2**)
- 20 b. Plaintiff Jose DeCastro's Supplemental Responses To Defendant Michael  
21 Pierattini's Requests For Admission, Set One (a true and correct copy of which is  
22 attached hereto as **Exhibit 3**)
- 23 c. Plaintiff Jose DeCastro's Supplemental Responses To Defendant Michael  
24 Pierattini's Form Interrogatories, Set One (a true and correct copy of which is  
25 attached hereto as **Exhibit 4**)
- 26 d. Plaintiff Jose DeCastro's Supplemental Responses To Defendant Michael  
27 Pierattini's Special Interrogatories, Set One (a true and correct copy of which is  
28 attached hereto as **Exhibit 5**)

1           8. On September 5, 2024, the Court issued a minute order granting in part Pierattini’s Motion  
2 for Summary Judgment, finding in Pierattini’s favor on all causes of action against him except  
3 Plaintiff’s Right of Publicity claim. As such, the only live claims against Defendant Pierattini are  
4 those based on a right of publicity cause of action and the remaining claims are no longer relevant.

5  
6 I declare under penalty of perjury of the State of California that the above is true and correct to the  
7 best of my belief and understanding.

8 Date: January 22, 2025

9 By:   
          Steven T. Gebelin

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**EXHIBIT 1**

**From:** steven@lawbylg.com  
**Sent:** Monday, September 23, 2024 10:46 AM  
**To:** 'Paul Katrinak'  
**Subject:** RE: DiCastro Deposition and Discovery

Sure, let me know some times you're available.

Best,

Steven Gebelin  
steven@lawbylg.com  
Lesowitz Gebelin LLP  
310-341-3072

---

**From:** Paul Katrinak <katrinaklaw@gmail.com>  
**Sent:** Monday, September 23, 2024 9:39 AM  
**To:** Steven Gebelin <steven@lawbylg.com>  
**Subject:** Re: DiCastro Deposition and Discovery

I have a deposition today that I thought was cancelled. Let's push the call until sometime next week.

On Fri, Sep 20, 2024 at 12:13 PM Paul Katrinak <[katrinaklaw@gmail.com](mailto:katrinaklaw@gmail.com)> wrote:

Yes. I need the discovery that was ordered by the Court months ago. 2:00 p.m. on Monday.

On Fri, Sep 20, 2024 at 12:07 PM Steven Gebelin <[steven@lawbylg.com](mailto:steven@lawbylg.com)> wrote:

I had the date blocked on my calendar, but it's your deposition so if you want to move it, your choice and I don't mind as long as we reschedule it for dates my client and I are available.

Monday afternoon is pretty open for me, you pick the hour.

Best,  
Steven

On Fri, Sep 20, 2024, 12:02 PM Paul Katrinak <[katrinaklaw@gmail.com](mailto:katrinaklaw@gmail.com)> wrote:

Dear Mr. Gebelin,

That's fine. I just want to confirm that the deposition is not proceeding on Tuesday and we are continuing it due to the discovery issues and potential settlement. Also, what time on Monday is convenient for you?

Very Truly Yours,

Paul Katrinak

On Fri, Sep 20, 2024 at 11:56 AM Steven Gebelin <[steven@lawbylg.com](mailto:steven@lawbylg.com)> wrote:

Hi Paul,

I'm in arbitration this week and I don't believe I saw your prior email. I'm wrapping up this afternoon/evening and will look for it afterwards and make sure to find it.

Can we schedule a time to chat in Monday so we're on the same page with discovery and me understanding your clients' settlement posture?

Thanks,  
Steven

On Fri, Sep 20, 2024, 11:53 AM Paul Katrinak <[katrinaklaw@gmail.com](mailto:katrinaklaw@gmail.com)> wrote:

Dear Mr. Goblin,

I need to talk to you about the deposition of your client, and would like to talk to you about the settlement proposal as well. Let me know if you have time today. I called you last week and emailed you. Or, you can email me if you are tied up. I did not get a call back. I need the written discovery to take your client's deposition.

Very Truly Yours,

Paul Katrinak

--

Paul Katrinak  
Law Offices of R. Paul Katrinak  
[9663 Santa Monica Blvd.](#), 458  
Beverly Hills, California 90210  
Tel: (310) 990-4348  
Fax: (310) 921-5398

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**EXHIBIT 2**

Plaintiff Jose DeCastro’s Supplemental Responses To Defendant Michael Pierattini’s Requests  
For Production Of Documents, Set One

1 **LESOWITZ GEBELIN LLP**  
Steven T. Gebelin, Esq. (Bar No. 261507)  
2 steven@lawbylg.com  
8383 Wilshire Blvd., Suite 800  
3 Beverly Hills, CA 90211  
4 Telephone: (310) 341-3072  
Facsimile: (310) 341-3070

5 Attorneys for Plaintiff Jose DeCastro

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **COUNTY OF LOS ANGELES, SANTA MONICA COURTHOUSE**

9 JOSE DECASTRO,

10 Plaintiff,

11 V.

12 KATHERINE PETER; DANIEL  
13 CLEMENT; MICHAEL PIERATTINI;  
14 DAVID OMO JR.; and DOES 1 TO 30,  
inclusive,

15 Defendants.  
16

Case No.: 23SMCV00538

Assigned for all Purposes to  
*Hon. H. Jay Ford III*, Department O

**PLAINTIFF JOSE DECASTRO'S  
SUPPLEMENTAL RESPONSES TO  
DEFENDANT MICHAEL PIERATTINI'S  
REQUESTS FOR PRODUCTION OF  
DOCUMENTS, SET ONE**

Case Filed: February 6, 2023  
Trial Date: February 24, 2025

17  
18 PROPOUNDING PARTY: **DEFENDANT MICHAEL PIERATTINI**

19 RESPONDING PARTY: **PLAINTIFF JOSE DECASTRO**

20 SET NUMBER: ONE (1)  
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1 Pursuant to California Code of Civil Procedure § 2034.010, *et seq.*, and this Court’s Order  
2 dated May 2, 2024, Plaintiff JOSE DECASTRO (“Plaintiff” or “Responding Party”) hereby  
3 supplements his response to these Demands for REQUESTS FOR PRODUCTION OF  
4 DOCUMENTS, as follows:

5 **DOCUMENT REQUEST NO. 1**

6 Any and all COMMUNICATIONS between YOU and anyone CONCERNING  
7 PIERATTINI.

8 **RESPONSE TO DOCUMENT REQUEST NO. 1:**

9 Plaintiff objects in full to this request on the following grounds: 1) It is cumulative,  
10 duplicative, overbroad, or unduly burdensome in that it places no limitation on the relevant time  
11 frame or the events relating to the subject matter of the litigation. 2) It calls for the disclosure of  
12 information protected from discovery by the attorney-client privilege. 3) It seeks proprietary  
13 information that is a trade secret. 4) It seeks ESI that is not reasonably accessible to the Plaintiff  
14 and Plaintiff will not proceed without an agreement of costs. 5) It is irrelevant and beyond the  
15 scope of discovery (Defendant Michael Pierattini (“Pierattini”) has no claims related to Plaintiff’s  
16 speech).

17 **SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 1:**

18 Plaintiff produces all his non-privileged communications concerning Pierattini herewith.

20 **DOCUMENT REQUEST NO. 2:**

21 Any and all DOCUMENTS that support YOUR claims for damages in YOUR complaint.

22 **RESPONSE TO DOCUMENT REQUEST NO. 2:**

23 I will submit my answers below. Michael has taken down the videos where he made  
24 defamatory claims. However, he will not be able to deny under penalty of perjury that he has  
25 indeed claimed that I am a drug dealer, that I have sexually assaulted women, that I have sold the  
26 Date rape drug, that I’m a felon.

27 **SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 2:**

28 Michael Pertini has called me a drug dealer, claimed that I stole from my roommate,

1 claimed that I was on probation, and I feared being put back in jail when that wasn't true. He has  
2 claimed that I sold the Date rape drug called GHB. This is defamation per se because that's not  
3 true. In his own videos, he has claimed that I am a drug dealer and he has called me a felon. I am  
4 not a felon.

5  
6 **DOCUMENT REQUEST NO. 4:**

7 Any and all DOCUMENTS that YOU claim support damages to YOUR reputation for the  
8 matters set forth in YOUR complaint.

9 **RESPONSE TO DOCUMENT REQUEST NO. 4:**

10 Plaintiff objects in full to this request on the following grounds: 1) It is cumulative,  
11 duplicative, overbroad, or unduly burdensome in that it places no limitation on the relevant time  
12 frame or the events relating to the subject matter of the litigation. 2) After a diligent search and  
13 reasonable inquiry, the responsive documents cannot be produced as they have never existed, have  
14 been destroyed, have been lost, misplaced, or stolen. Responding party believes that Pierattini has  
15 possession, custody, or control of the responsive documents. 3) It calls for the disclosure of  
16 information protected from discovery by the attorney-client privilege. 4) It is so vague and  
17 ambiguous that Plaintiff cannot in good faith determine the scope of the request. 5) It seeks  
18 proprietary information that is a trade secret. 6) It seeks ESI that is not reasonably accessible to the  
19 Plaintiff and Plaintiff will not proceed without an agreement of costs.

20 **SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 4:**

21 Michael has claimed that I am a drug dealer and that I am a felon on the run. That I am a  
22 drug dealer and I sold the Date rape drug. That I am a wanted fugitive. He has created dozens and  
23 dozens of videos about me to do nothing but disparage my good name

24  
25  
26 **DOCUMENT REQUEST NO. 5:**

27 Any and all DOCUMENTS that support YOUR claims against PIERATTINI of  
28 harassment, trolling, vandalism, hacking, or any other alleged behavior directed at YOU or YOUR

1 trade.

2 **RESPONSE TO DOCUMENT REQUEST NO. 5:**

3 Plaintiff objects in full to this request on the following grounds: 1) It is cumulative,  
4 duplicative, overbroad, or unduly burdensome in that it places no limitation on the relevant time  
5 frame or the events relating to the subject matter of the litigation. 2) After a diligent search and  
6 reasonable inquiry, the responsive documents cannot be produced as they have never existed, have  
7 been destroyed, have been lost, misplaced, or stolen. Responding party believes that Pierattini has  
8 possession, custody, or control of the responsive documents. 3) It calls for the disclosure of  
9 information protected from discovery by the attorney-client privilege. 4) It is so vague and  
10 ambiguous that Plaintiff cannot in good faith determine the scope of the request. 5) It seeks  
11 proprietary information that is a trade secret. 6) It seeks ESI that is not reasonably accessible to the  
12 Plaintiff and Plaintiff will not proceed without an agreement of costs.

13 **SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 5:**

14 These things have been well documented in the screenshots. He is an active member and a  
15 participating, paying member, of the Troll mafia. He has stalked me across the country, pinning  
16 my exact locations in the discord account for, Troll mafia. His associations are with Troll ma he  
17 has and continues to actively participate with this group that labels themselves, Troll mafia. It is  
18 all in the screenshots of the discord account, Troll mafia. It is in his own videos. It is in the  
19 thumbnails that he creates for his YouTube page. See, Michael doesn't get anybody to watch his  
20 channel unless he is attacking another person. Unless he is defaming, disparaging, degrading  
21 another human being. If Michael tries to create a video that just regards his interest, nobody  
22 watches his videos.

23

24

25 **DOCUMENT REQUEST NO. 6:**

26 Any and all DOCUMENTS that support YOUR first cause of action for "libel, slander, and  
27 false light" against PIERATTINI.

28 **RESPONSE TO DOCUMENT REQUEST NO. 6:**

1 Plaintiff objects in full to this request on the following grounds: 1) It is cumulative,  
2 duplicative, overbroad, or unduly burdensome in that it places no limitation on the relevant time  
3 frame or the events relating to the subject matter of the litigation. 2) After a diligent search and  
4 reasonable inquiry, the responsive documents cannot be produced as they have never existed, have  
5 been destroyed, have been lost, misplaced, or stolen. Responding party believes that Pierattini has  
6 possession, custody, or control of the responsive documents. 3) It calls for the disclosure of  
7 information protected from discovery by the attorney-client privilege. 4) It is so vague and  
8 ambiguous that Plaintiff cannot in good faith determine the scope of the request. 5) It seeks  
9 proprietary information that is a trade secret. 6) It seeks ESI that is not reasonably accessible to the  
10 Plaintiff and Plaintiff will not proceed without an agreement of costs.

11 **SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 6:**

12 There are plenty of screenshots available for you. There are video clips that I have  
13 submitted. Clearly, he claims that I stole my roommates, identification, and that I didn't wanna go  
14 back to jail. Neither one of those are true. I did not steal my roommates, identification, and I didn't  
15 ever fear of, "going back to jail" because I had not been put in jail.

16  
17 **DOCUMENT REQUEST NO. 7:**

18 Any and all DOCUMENTS that support YOUR second cause of action for "battery"  
19 against PIERATTINI.

20 **RESPONSE TO DOCUMENT REQUEST NO. 7:**

21 Plaintiff objects in full to this request on the following grounds: 1) It is cumulative,  
22 duplicative, overbroad, or unduly burdensome in that it places no limitation on the relevant time  
23 frame or the events relating to the subject matter of the litigation. 2) After a diligent search and  
24 reasonable inquiry, the responsive documents cannot be produced as they have never existed, have  
25 been destroyed, have been lost, misplaced, or stolen. Responding party believes that Pierattini has  
26 possession, custody, or control of the responsive documents. 3) It calls for the disclosure of  
27 information protected from discovery by the attorney-client privilege. 4) It is so vague and  
28 ambiguous that Plaintiff cannot in good faith determine the scope of the request. 5) It seeks

1 proprietary information that is a trade secret. 6) It seeks ESI that is not reasonably accessible to the  
2 Plaintiff and Plaintiff will not proceed without an agreement of costs.

3 **SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 7:**

4 Plaintiff produces all his non-privileged DOCUMENTS supporting his active claims  
5 against Pierattini for “battery” herewith.

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8 **DOCUMENT REQUEST NO. 8:**

9 Any and all DOCUMENTS that support YOUR third cause of action for “trespass” against  
10 PIERATTINI.

11 **RESPONSE TO DOCUMENT REQUEST NO. 8:**

12 Plaintiff objects in full to this request on the following grounds: 1) It is cumulative,  
13 duplicative, overbroad, or unduly burdensome in that it places no limitation on the relevant time  
14 frame or the events relating to the subject matter of the litigation. 2) After a diligent search and  
15 reasonable inquiry, the responsive documents cannot be produced as they have never existed, have  
16 been destroyed, have been lost, misplaced, or stolen. Responding party believes that Pierattini has  
17 possession, custody, or control of the responsive documents. 3) It calls for the disclosure of  
18 information protected from discovery by the attorney-client privilege. 4) It is so vague and  
19 ambiguous that Plaintiff cannot in good faith determine the scope of the request. 5) It seeks  
20 proprietary information that is a trade secret. 6) It seeks ESI that is not reasonably accessible to the  
21 Plaintiff and Plaintiff will not proceed without an agreement of costs.

22 **SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 8:**

23 Michael Pertini has participated with Troll, mafia, and members of Troll mafia, where they  
24 have trespassed on my property, damaged my property, my van was stolen. Michael doesn't have  
25 to be the exact human being who does it, he participates in the things that these people do. He is,  
26 has been, actively stalking me and pinpointing my location. Pretending as though he's a private  
27 investigator. He's not a private investigator. He has reported himself to be a private investigator  
28 and he's not.

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**DOCUMENT REQUEST NO. 9:**

Any and all DOCUMENTS that support YOUR fourth cause of action for “harassment and civil conspiracy” against PIERATTINI.

**RESPONSE TO DOCUMENT REQUEST NO. 9:**

Plaintiff objects in full to this request on the following grounds: 1) It is cumulative, duplicative, overbroad, or unduly burdensome in that it places no limitation on the relevant time frame or the events relating to the subject matter of the litigation. 2) After a diligent search and reasonable inquiry, the responsive documents cannot be produced as they have never existed, have been destroyed, have been lost, misplaced, or stolen. Responding party believes that Pierattini has possession, custody, or control of the responsive documents. 3) It calls for the disclosure of information protected from discovery by the attorney-client privilege. 4) It is so vague and ambiguous that Plaintiff cannot in good faith determine the scope of the request. 5) It seeks proprietary information that is a trade secret. 6) It seeks ESI that is not reasonably accessible to the Plaintiff and Plaintiff will not proceed without an agreement of costs.

**SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 9:**

It is plain as a day from the screenshots that I’m providing that Michael is deeply involved with Troll mafia, an active member, participating in the stocking and harassment. It’s incredible. The fact that I’m here filing a lawsuit is because of what you read in the screenshots and because of the things that he stated on camera about me. How many times he has called my phone or had others called my phone and leave me messages. It’s absolutely incredible. I have submitted some screenshots of some phone calls, for the ones that I called 100s of people called me when I was trying to do my live streams on YouTube.

**DOCUMENT REQUEST NO. 10:**

Any and all DOCUMENTS that support YOUR fifth cause of action for “stalking, cyberstalking, and civil conspiracy” against PIERATTINI.



1 **RESPONSE TO DOCUMENT REQUEST NO. 10:**

2 Plaintiff objects in full to this request on the following grounds: 1) It is cumulative,  
3 duplicative, overbroad, or unduly burdensome in that it places no limitation on the relevant time  
4 frame or the events relating to the subject matter of the litigation. 2) After a diligent search and  
5 reasonable inquiry, the responsive documents cannot be produced as they have never existed, have  
6 been destroyed, have been lost, misplaced, or stolen. Responding party believes that Pierattini has  
7 possession, custody, or control of the responsive documents. 3) It calls for the disclosure of  
8 information protected from discovery by the attorney-client privilege. 4) It is so vague and  
9 ambiguous that Plaintiff cannot in good faith determine the scope of the request. 5) It seeks  
10 proprietary information that is a trade secret. 6) It seeks ESI that is not reasonably accessible to the  
11 Plaintiff and Plaintiff will not proceed without an agreement of costs.

12 **SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 10:**

13 These questions are redundant. There are hundreds of screenshots. I am submitting around  
14 150. You can clearly see the Michael Pertini is actively participating with these people and that he  
15 is a troll from troll mafia.

16  
17 **DOCUMENT REQUEST NO. 11:**

18 Any and all DOCUMENTS that support YOUR sixth cause of action for “assault” against  
19 PIERATTINI.

20 **RESPONSE TO DOCUMENT REQUEST NO. 11:**

21 Plaintiff objects in full to this request on the following grounds: 1) It is cumulative,  
22 duplicative, overbroad, or unduly burdensome in that it places no limitation on the relevant time  
23 frame or the events relating to the subject matter of the litigation. 2) After a diligent search and  
24 reasonable inquiry, the responsive documents cannot be produced as they have never existed, have  
25 been destroyed, have been lost, misplaced, or stolen. Responding party believes that Pierattini has  
26 possession, custody, or control of the responsive documents. 3) It calls for the disclosure of  
27 information protected from discovery by the attorney-client privilege. 4) It is so vague and  
28 ambiguous that Plaintiff cannot in good faith determine the scope of the request. 5) It seeks

1 proprietary information that is a trade secret. 6) It seeks ESI that is not reasonably accessible to the  
2 Plaintiff and Plaintiff will not proceed without an agreement of costs.

3 **SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 11:**

4 Plaintiff produces all his non-privileged DOCUMENTS supporting his active claims  
5 against Pierattini for “assault” herewith.

6  
7 **DOCUMENT REQUEST NO. 12:**

8 Any and all DOCUMENTS that support YOUR seventh cause of action for “economic  
9 interference” against PIERATTINI.

10 **RESPONSE TO DOCUMENT REQUEST NO. 12:**

11 Plaintiff objects in full to this request on the following grounds: 1) It is cumulative,  
12 duplicative, overbroad, or unduly burdensome in that it places no limitation on the relevant time  
13 frame or the events relating to the subject matter of the litigation. 2) After a diligent search and  
14 reasonable inquiry, the responsive documents cannot be produced as they have never existed, have  
15 been destroyed, have been lost, misplaced, or stolen. Responding party believes that Pierattini has  
16 possession, custody, or control of the responsive documents. 3) It calls for the disclosure of  
17 information protected from discovery by the attorney-client privilege. 4) It is so vague and  
18 ambiguous that Plaintiff cannot in good faith determine the scope of the request. 5) It seeks  
19 proprietary information that is a trade secret. 6) It seeks ESI that is not reasonably accessible to the  
20 Plaintiff and Plaintiff will not proceed without an agreement of costs.

21 **SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 12:**

22 Michael Pertini created call floods when I was doing my job. I am a reporter. When I am  
23 live streaming, he put my phone number out on his YouTube channel and then told his people,  
24 “whatever you do don’t call him!”. He is a member of Troll mafia and by calling my phone  
25 hundreds of times when I’m trying to do my job, that is definitely economic interference.

26  
27  
28 **DOCUMENT REQUEST NO. 13:**

1 Any and all DOCUMENTS that support YOUR eighth cause of action for “right to  
2 publicity torts” against PIERATTINI.

3 **RESPONSE TO DOCUMENT REQUEST NO. 13:**

4 Plaintiff objects in full to this request on the following grounds: 1) It is cumulative,  
5 duplicative, overbroad, or unduly burdensome in that it places no limitation on the relevant time  
6 frame or the events relating to the subject matter of the litigation. 2) After a diligent search and  
7 reasonable inquiry, the responsive documents cannot be produced as they have never existed, have  
8 been destroyed, have been lost, misplaced, or stolen. Responding party believes that Pierattini has  
9 possession, custody, or control of the responsive documents. 3) It calls for the disclosure of  
10 information protected from discovery by the attorney-client privilege. 4) It is so vague and  
11 ambiguous that Plaintiff cannot in good faith determine the scope of the request. 5) It seeks  
12 proprietary information that is a trade secret. 6) It seeks ESI that is not reasonably accessible to the  
13 Plaintiff and Plaintiff will not proceed without an agreement of costs.

14 **SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 13:**

15 Michael creates thumbnails for his videos that use my likeness, my pictures. Michael  
16 Pieraitti will use my videos as a “review” where he sits there and cuts me down and bashes me and  
17 makes thousands and thousands of dollars from these things happening. It is my right to my  
18 publicity, not Michaels.

19  
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21 **DOCUMENT REQUEST NO. 18:**

22 Any and all emails YOU have allegedly received from PIERATTINI.

23 **RESPONSE TO DOCUMENT REQUEST NO. 18:**

24 Plaintiff objects in full to this request on the following grounds: 1) It is cumulative,  
25 duplicative, overbroad, or unduly burdensome in that it places no limitation on the relevant time  
26 frame or the events relating to the subject matter of the litigation. 2) After a diligent search and  
27 reasonable inquiry, the responsive documents cannot be produced as they have never existed, have  
28 been destroyed, have been lost, misplaced, or stolen. Responding party believes that Pierattini has

1 possession, custody, or control of the responsive documents. 3) It calls for the disclosure of  
2 information protected from discovery by the attorney-client privilege. 4) It is so vague and  
3 ambiguous that Plaintiff cannot in good faith determine the scope of the request. 5) It seeks  
4 proprietary information that is a trade secret. 6) It seeks ESI that is not reasonably accessible to the  
5 Plaintiff and Plaintiff will not proceed without an agreement of costs.

6 **SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 18:**

7 Plaintiff produces herewith all emails received from Pierattini.

8  
9 **DOCUMENT REQUEST NO. 19:**

10 The letter YOUR friend allegedly found in his mailbox on October 25, 2022 while YOU  
11 were staying with him.

12 **RESPONSE TO DOCUMENT REQUEST NO. 19:**

13 Plaintiff objects in full to this request on the following grounds: 1) It is cumulative,  
14 duplicative, overbroad, or unduly burdensome in that it places no limitation on the relevant time  
15 frame or the events relating to the subject matter of the litigation. 2) After a diligent search and  
16 reasonable inquiry, the responsive documents cannot be produced as they have never existed, have  
17 been destroyed, have been lost, misplaced, or stolen. Responding party believes that Pierattini has  
18 possession, custody, or control of the responsive documents. 3) It calls for the disclosure of  
19 information protected from discovery by the attorney-client privilege. 4) It is so vague and  
20 ambiguous that Plaintiff cannot in good faith determine the scope of the request. 5) It seeks  
21 proprietary information that is a trade secret. 6) It seeks ESI that is not reasonably accessible to the  
22 Plaintiff and Plaintiff will not proceed without an agreement of costs.

23 **SUPPLEMENTAL RESPONSE TO DOCUMENT REQUEST NO. 19:**

24 The letter has been submitted to my attorney to submit into evidence. It's from the group,  
25 Troll mafia. Or a member of the group, that Michael Pertini is a part of.

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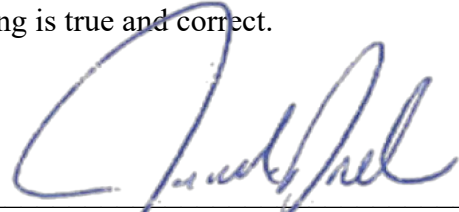
**VERIFICATION**

STATE OF CALIFORNIA ) JOSE DECASTRO V.  
COUNTY OF LOS ANGELES ) PETER, ET AL.

I, Jose DeCastro, am the Plaintiff in the above-entitled action. I have read the foregoing document described as **PLAINTIFF JOSE DECASTRO’S SUPPLEMENTAL RESPONSES TO DEFENDANT MICHAEL PIERATTINI’S REQUESTS FOR PRODUCTION TO PLAINTIFF JOSE DECASTRO, SET ONE** and know its contents.

Said responses were prepared based upon personal knowledge and information provided to me and I believe these responses to be true. I believe I have reviewed all documents, records and information possessed by myself regarding this action and based on that review, the matters stated herein are true and correct, except for those matters that are stated upon information and belief and as to those matters I believe them to be true.

I declare under penalty of perjury, under the laws of the State of California, that the foregoing is true and correct.

By:   
**JOSE DECASTRO**  
*Plaintiff*

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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

*DeCastro v. Peter, et al.*, Los Angeles County Superior Court Case No 23SMCV00538

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action; my business address is 8383 Wilshire Blvd., Suite 800, Beverly Hills, CA 90211.

On January 20, 2025, I served the following document(s) on the interested parties in this action:  
**PLAINTIFF JOSE DECASTRO'S SUPPLEMENTAL RESPONSES TO DEFENDANT MICHAEL PIERATTINI'S REQUESTS FOR PRODUCTION TO PLAINTIFF JOSE DECASTRO, SET ONE**

by placing true copies thereof enclosed in sealed envelopes addressed as follows:

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

*Attorneys for Defendant*  
Michael Pierattini

(BY E-MAIL) Pursuant to CCP § 1010.6, based on the named party's electronic filing in this case being deemed assent to electronic service under the local rules, I sent such document to the individual(s) identified at the email address referenced above.

(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct

Executed on January 22, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Steven T. Gebelin

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**EXHIBIT 3**

Plaintiff Jose DeCastro’s Supplemental Responses To Defendant Michael Pierattini’s Requests  
For Admission, Set One

1 **LESOWITZ GEBELIN LLP**  
Steven T. Gebelin, Esq. (Bar No. 261507)  
2 steven@lawbylg.com  
8383 Wilshire Blvd., Suite 800  
3 Beverly Hills, CA 90211  
4 Telephone: (310) 341-3072  
Facsimile: (310) 341-3070  
5 Attorneys for Plaintiff Jose DeCastro

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **COUNTY OF LOS ANGELES, SANTA MONICA COURTHOUSE**

9 JOSE DECASTRO,  
10 Plaintiff,  
11  
12 V.  
13 KATHERINE PETER; DANIEL  
CLEMENT; MICHAEL PIERATTINI;  
14 DAVID OMO JR.; and DOES 1 TO 30,  
inclusive,  
15 Defendants.  
16

Case No.: 23SMCV00538  
Assigned for all Purposes to  
*Hon. H. Jay Ford III*, Department O  
**PLAINTIFF JOSE DECASTRO'S  
SUPPLEMENTAL RESPONSES TO  
DEFENDANT MICHAEL PIERATTINI'S  
REQUESTS FOR ADMISSION TO  
PLAINTIFF JOSE DECASTRO, SET ONE**  
Case Filed: February 6, 2023  
Trial Date: February 24, 2025

18 PROPOUNDING PARTY: **DEFENDANT MICHAEL PIERATTINI**  
19 RESPONDING PARTY: **PLAINTIFF JOSE DECASTRO**  
20 SET NUMBER: ONE (1)  
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1 Pursuant to California Code of Civil Procedure § 2031.010, *et seq.*, and this Court’s Order  
2 dated May 2, 2024, Plaintiff JOSE DECASTRO (“Plaintiff” or “Responding Party”) hereby  
3 supplements his response to these Demands for REQUEST FOR ADMISSIONS, as follows:

4 **REQUEST FOR ADMISSION NO. 22:**

5 Admit that PIERATTINI has never entered onto YOUR property.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

7 Plaintiff objects in full on the following grounds: 1) After reasonable inquiry, the  
8 information that Plaintiff knows or can readily obtain is insufficient to enable him to admit or  
9 deny the truth of this request. The admission or denial of this request requires Plaintiff to have  
10 information which Plaintiff does not have in hi records and which is not within the knowledge of  
11 Plaintiff’s employees, agents, and others of whom Plaintiff has made reasonable inquires; 2)  
12 Admission or denial of the matter requested would result in the disclosure of information  
13 protected by the attorney-client-privilege.

14 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

15 *Pertini was working and conspiring with thousands of people called, “Troll mafia”. I have*  
16 *screenshots that show that he was colluding to bring people on my property to put dog shit on my*  
17 *porch. I have the screenshots. I’ve never had a chance to submit them because I didn’t understand*  
18 *the process and then after I hired a lawyer, the judge has not given me consideration or giving me*  
19 *a chance to submit this evidence. I have been denied due process by this judge.*

20  
21 **REQUEST FOR ADMISSION NO. 23:**

22 Admit that PIERATTINI has never harmed YOUR property.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

24 Plaintiff objects in full on the following grounds: 1) After reasonable inquiry, the  
25 information that Plaintiff knows or can readily obtain is insufficient to enable him to admit or  
26 deny the truth of this request. The admission or denial of this request requires Plaintiff to have  
27 information which Plaintiff does not have in his records and which is not within the knowledge of  
28 Plaintiff’s employees, agents, and others of whom Plaintiff has made reasonable inquires; 2)

1 Admission or denial of the matter requested would result in the disclosure of information  
2 protected by the attorney-client-privilege.

3 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

4 *My property in Colorado, the Airbnb, that I was renting, was certainly damaged by the people*  
5 *who conspired with Michael Pertini to put dog shit on my doorstep and Nutella on my door knob.*  
6 *The door knob was broken in the process of doing these things. I have a video showing this. I have*  
7 *screenshots from The, "Troll mafia", discord that shows Michael Pertini representing himself as*  
8 *Sergeant blue bacon.*

9  
10 **REQUEST FOR ADMISSION NO. 24:**

11 Admit that PIERATTINI never admitted to the alleged theft of YOUR van. FALSE: HE  
12 did claim that he was a part of stealing my van- I have the screenshot from "Troll Mafia" Discord.

13 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

14 Plaintiff objects in full on the following grounds: 1) After reasonable inquiry, the  
15 information that Plaintiff knows or can readily obtain is insufficient to enable him to admit or  
16 deny the truth of this request. The admission or denial of this request requires Plaintiff to have  
17 information which Plaintiff does not have in hi records and which is not within the knowledge of  
18 Plaintiff's employees, agents, and others of whom Plaintiff has made reasonable inquires; 2)  
19 Admission or denial of the matter requested would result in the disclosure of information  
20 protected by the attorney-client-privilege. 3) Refers to matters outside the question (alleged  
21 where?).

22 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

23 *In the discord, Michael Pertini, representing himself as blue bacon, certainly stated that he*  
24 *had knowledge of who stole my van, but he just wasn't saying. I have the screenshots from the*  
25 *discord now. Again, I have not been given the proper consideration to admit the evidence. First,*  
26 *when I was representing myself, I didn't understand the process. Because I didn't understand the*  
27 *process, this judge admonished me and pretty much demanded that I get an attorney. Then when I*  
28 *did get an attorney, the judge isn't allowing me to submit the evidence and simply dismiss the*

1 *claims of Stalking and harassment. However, the truth comes out as I submit evidence in my claim*  
2 *of “right to publicity” where Michael Pertini is in the comment section referring to this exact*  
3 *scenario. However, I have not been allowed to process. Second, after being wrongfully,*  
4 *incarcerated and exonerated, I have not been giving the proper consideration to submit the*  
5 *evidence. The honorable J Ford has allowed multiple things to happen when I was in jail and then*  
6 *didn’t give me the proper time to recuperate after being wrongfully incarcerated, and then*  
7 *exonerated. The honorable judge, Jay Ford has not given me the proper consideration.*

8  
9 **REQUEST FOR ADMISSION NO. 25:**

10 Admit that PIERATTINI never took credit for the alleged theft of YOUR van. Nope, he  
11 sure did. And I have the screenshot to prove it.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

13 Plaintiff objects in full on the following grounds: 1) After reasonable inquiry, the  
14 information that Plaintiff knows or can readily obtain is insufficient to enable him to admit or  
15 deny the truth of this request. The admission or denial of this request requires Plaintiff to have  
16 information which Plaintiff does not have in hi records and which is not within the knowledge of  
17 Plaintiff’s employees, agents, and others of whom Plaintiff has made reasonable inquires; 2)  
18 Admission or denial of the matter requested would result in the disclosure of information  
19 protected by the attorney-client-privilege. 3) Refers to matters outside the question (alleged  
20 where?). –

21 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

22 *Absolutely True. Michael Pertini conspired against me with thousands of people in what is*  
23 *called, “the Troll mafia”. Where in the discord account he represents himself as Sergeant blue*  
24 *Bacon, and he certainly conspired with other people and frivolously claimed that he had some sort*  
25 *of knowledge of what happened with my van being stolen.*

26  
27 **REQUEST FOR ADMISSION NO. 26:**

28 Admit that PIERATTINI did not leave a bag of dog feces, a card stating, “Kate Always

1 Wins,” and chocolate at YOUR front door.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

3 Plaintiff objects in full on the following grounds: 1) After reasonable inquiry, the  
4 information that Plaintiff knows or can readily obtain is insufficient to enable him to admit or  
5 deny the truth of this request. The admission or denial of this request requires Plaintiff to have  
6 information which Plaintiff does not have in hi records and which is not within the knowledge of  
7 Plaintiff’s employees, agents, and others of whom Plaintiff has made reasonable inquires; 2)  
8 Admission or denial of the matter requested would result in the disclosure of information  
9 protected by the attorney-client-privilege. 3) Compound and conjunctive.

10 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

11 *No, I have screenshots from the discord account called Troll mafia official, Ware Michael*  
12 *Pertini, posing as his fictitious name “Sgt. blue bacon” certainly insinuated that he was a part of*  
13 *it. Of course I was in Colorado, and Michael Pertini lives in Washington state. However, Michael*  
14 *Pertini was working in conjunction with “Troll mafia” where they’re 30,000 members are spread*  
15 *out across America. I have tons and tons of proof that connect all of these defendants together.*  
16 *Again, I have not been given the proper consideration and I haven’t had a chance to submit this*  
17 *evidence. I now have it available.*

18 *The truth will come out. I will not stop suing Michael Pertini, or going after him through*  
19 *the legal process until the truth comes out. I may not be given due process right now, I may not*  
20 *have been given the proper consideration, however, I will eventually one day. I’m going to file*  
21 *another lawsuit against him after this one. I will never stop.*

22  
23 **REQUEST FOR ADMISSION NO. 27:**

24 Admit that PIERATTINI did not leave balloons and a sign that read, “Kate’s Tea Party” at  
25 YOUR friend’s residence in New Hampshire.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

27 Plaintiff objects in full on the following grounds: 1) After reasonable inquiry, the  
28 information that Plaintiff knows or can readily obtain is insufficient to enable him to admit or

1 deny the truth of this request. The admission or denial of this request requires Plaintiff to have  
2 information which Plaintiff does not have in hi records and which is not within the knowledge of  
3 Plaintiff's employees, agents, and others of whom Plaintiff has made reasonable inquires; 2)  
4 Admission or denial of the matter requested would result in the disclosure of information  
5 protected by the attorney-client-privilege. I'm not sure how to answer this.

6 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

7       Again, Michael Pertini was working in conjunction in a conspiracy with Kate, Peter and  
8 "Troll mafia". I have screenshots where he admits to being a part of this. I have not been allowed  
9 to submit them because I was incapable after being locked in jail for over 4 months; of course,  
10 later, I would be completely exonerated with a certificate of innocence. However. then for six  
11 months after incarceration, I was experiencing such bad PTSD that I could not function. Thanks to  
12 the help of a counselor and getting back on to a healthy, fitness, lifestyle, I have broken through  
13 the PTSD and the brain fog.

14  
15 **REQUEST FOR ADMISSION NO. 37:**

16       Admit that PIERATTINI has not repeatedly emailed YOU.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

18       Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
19 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
20 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

21 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

22       *Michael Pertini emailed me at least six times a day for weeks and weeks. He used 2*  
23 *Different "Fake Court email accounts" that he or other members from Troll mafia official,*  
24 *created. He used several fake email accounts to mass spam me – he even brags about it in*  
25 *screenshots from the discord which I have, and he may have even submitted in his own discovery.*  
26 *The fake email addresses are: [Electroniccourtservices@proton.me](mailto:Electroniccourtservices@proton.me) -*  
27 *[Electronic.court.service@proton.me](mailto:Electronic.court.service@proton.me) – And there is a third email address that was created by the*  
28 *Troll mafia, working in conspiracy with Michael Pertini that was a Gmail account... Representing*

1 *itself as Pierce County Washington Court. I contacted the Pearce County Washington Court and*  
2 *none of the three of the email addresses came from them. Michael Pertini has correspondence*  
3 *with another member of the Troll mafia official where they state that they can contact me up to*  
4 *two or three times a day across any of my known emails and so I received dozens and dozens of*  
5 *spam.*

6  
7 **REQUEST FOR ADMISSION NO. 38:**

8 Admit that PIERATTINI has not cyberstalked YOU.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

10 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
11 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
12 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

13 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

14 *He absolutely has stalked me, and I am submitting proof today with just the screenshots*  
15 *alone from his live streams where he is colluding with “team skeptic”, also known as David Omo,*  
16 *a defendant in this case. It is absolutely plain as day just from the, “right of publicity” screenshots*  
17 *from Michael Pertini’s live stream that he was colluding with thousands of people, conspiring*  
18 *with thousands of people, to stalk me. The proof is in the screenshots from his live streams.*

19  
20  
21 **REQUEST FOR ADMISSION NO. 40:**

22 Admit that PIERATTINI has not harassed YOU.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

24 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
25 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
26 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

27 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

28 *This is absolutely preposterous. We are here in court because Michael Pertini’s constant,*

1 unending, harassment, and cyber stocking and using my image for him to make money. I sent to  
2 my attorney screenshots and voice memos from the hundreds, if not thousands of phone calls that I  
3 would receive when I did a live stream. They would leave voicemails saying, “blue bacon” or they  
4 would taunt me and say, “are you trying to live stream right now?” ... when you call someone’s  
5 phone when they are doing a live stream, it interrupts the live stream. Additionally, Michael  
6 Pertini called investors in my ventures. I will be submitting the letters from my investors where he  
7 and his people contacted them. I believe he did a live stream on April 9, 2022, the next day my  
8 Investor in Beverly Hills (NAME REDACTED) received hundreds of phone calls to the point  
9 where they had to shut down the office. This is absolutely preposterous. Why would I be spending  
10 tens of thousands of dollars suing this guy if he hadn’t harassed me. It’s preposterous.

11  
12  
13 **REQUEST FOR ADMISSION NO. 41:**

14 Admit that PIERATTINI has not trespassed on YOUR residence.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 41:**

16 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
17 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
18 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

19 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 41:**

20 *Again, Michael Pertini, conspired with members of, “Troll mafia official” to come on my*  
21 *property and put dog shit on my steps. Michael Pertini is the kind of person who will write things*  
22 *in the discord, that I have screenshots of that I’ve never been submitted, because I’m being denied*  
23 *proper due process, where Michael Pertini states, “I would never be involved in putting dog shit*  
24 *on Chille’s front porch” -*

25  
26 **REQUEST FOR ADMISSION NO. 42:**

27 Admit that PIERATTINI has not committed “wholesale copyright infringement” of  
28 YOUR creative content.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 42:**

2 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
3 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
4 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

5 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 42:**

6 *I am unsure of the term, "wholesale copyright infringement". I am now, after all of this,*  
7 *well educated in the arena of copyright. Because of the way Michael Pertini would get drunk on*  
8 *YouTube and then use my videos to disparage me, and make money, and defend me, I'm unsure if*  
9 *that is still the definition of, "wholesale copyright infringement". However, there are dozens of*  
10 *videos and live streams, some of which have been taken down, where Michael Pertini gets*  
11 *absolutely wasted, his speech is slurred, and he shows my videos for people to watch his channel.*  
12 *If you take a look at Michael Pertini's channel, nobody watches his channel unless he is bashing*  
13 *another person is that, "wholesale copyright infringement"? I'm not entirely sure.*

14  
15 **REQUEST FOR ADMISSION NO. 43:**

16 Admit that PIERATTINI has never harassed YOUR dog.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 43:**

18 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
19 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
20 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

21 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 43:**

22 *If My dog could talk, he would let you know that Michael Pertini is a parasite on actual*  
23 *prime movers. However, MyDawggg can't talk. Does MyDawggg feel harassed by Michael*  
24 *Pertini? You would have to ask him.*

25  
26 **REQUEST FOR ADMISSION NO. 44:**

27 Admit that PIERATTINI has not refused to honor any alleged harassment cease requests or  
28 demands.



1 **RESPONSE TO REQUEST FOR ADMISSION NO. 44:**

2 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
3 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
4 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

5 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 44:**

6 *That's entirely not true. I have several emails where I sent him cease and desist letters.*  
7 *Again, this court, and the honorable judge, Jay Ford, have not given me the proper consideration*  
8 *and have denied me to process.*

9  
10 **REQUEST FOR ADMISSION NO. 45:**

11 Admit that PIERATTINI is not part of any alleged conspiracy against YOU.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 45:**

13 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
14 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
15 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

16 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 45:**

17 *Michael Pertini has absolutely been involved in a conspiracy against me to stalk me,*  
18 *harassed me and to use my image for personal gain. In the, "right of publicity" screenshots from*  
19 *his live stream, this fact is abundantly evident just by reading the comments submitted to this cou I*  
20 *would implore Michael Pertini not to remove the live chat review from his live stream as we are*  
21 *still going through it. Michael Pertini has been involved in a conspiracy against me since he*  
22 *started making videos about me and connecting with his codefendant Kate, Peter and David Omo.*  
23 *They all know each other. They are all friends. In the discovery that was sent over to me from Mr.*  
24 *Pertini's lawyer, you can see that these people are communicating to conspire against me.*

25  
26 **REQUEST FOR ADMISSION NO. 46:**

27 Admit that PIERATTINI has never stated on the alleged Discord channel that he planted  
28 an Apple AirTag in and/or on YOUR vehicle.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 46:**

2 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
3 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
4 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

5 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 46:**

6 *I have the screenshot from, "Troll mafia official" where Michael Pertini conspired with*  
7 *thousands of other people where Michael Pertini states, "Nobody should put an AirTag on*  
8 *Chille's vehicle, whatever you do, don't do that!" it's the same kind of double talk that he does*  
9 *during his live streams. However, I have not been able to get the proper evidence in place because*  
10 *I have not been given the proper consideration and the honorable judge J Ford has certainly*  
11 *hindered my ability to get the proper due process. Even, agreeing with defense council, when I*  
12 *was incarcerated, disparaging my character. Never once considering that I have been wrongfully*  
13 *incarcerated. I feel as though the honorable judge, Jay Ford is a part of this madness against me.*  
14 *He is not giving me due process and is not giving me proper consideration. The honorable judge*  
15 *Jay Ford has never been thrown into a dungeon, unlawfully, treated inhumanely, and then*  
16 *supposed to be able to get out of that dungeon and function properly and jump right into a*  
17 *defamation lawsuit.*

18  
19 **REQUEST FOR ADMISSION NO. 47:**

20 Admit that PIERATTINI has never directly emailed YOU stating that he planted an Apple  
21 AirTag in and/or on YOUR vehicle.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 47:**

23 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
24 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
25 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

26 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 47:**

27  
28 **REQUEST FOR ADMISSION NO. 48:**

1 Admit that PIERATTINI has never written and/or stated in Defendant Peter’s videos that  
2 he is actively tracking YOU.

3 **RESPONSE TO REQUEST FOR ADMISSION NO. 48:**

4 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
5 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
6 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

7 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 48:**

8 *He was absolutely tracking and stalking me, with Troll mafia official and even using his*  
9 *own subscribers on YouTube. In the screenshots regarding The, “right to publicity” his*  
10 *subscribers are actively tracking me during his live stream. Then, Michael Pertini would end his*  
11 *live stream and go to the Troll mafia official discord server and participate in stalking me and*  
12 *tracking me. There is definitive proof being submitted today from his live stream chat alone. That*  
13 *is not including the discord screenshots that the honorable Judge J Ford has not allowed me to*  
14 *submit, denying me, consider consideration and do process.*

15

16 **REQUEST FOR ADMISSION NO. 49:**

17 Admit that PIERATTINI has never posted YOUR exact location in the “Live Chat” of one  
18 of YOUR live streams.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 49:**

20 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
21 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
22 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

23

24 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 49:**

25 He absolutely did exactly that. It even goes further. Pertini, conspiring with his subscribers  
26 and, “Troll mafia official”, in his live chat, in the evidence submitted today regarding, “right to  
27 publicity”, one of Michael Pertini, subscribers, and a paying member of Michael Pertini’s channel,  
28 the name of his YouTube username is, “StateLine Cabins” – where the user, “Sergeant blue

1 bacon” had posted a picture of my vehicle in front of the state line cabins where I was sleeping.  
2 Thousands and thousands of people responded to this picture posted and Michael Pertini’s  
3 subscribers created that username. Michael Pertini conspired to stalk me and put the exact location  
4 in both my live stream and his live stream. It’s morbid and preposterous to believe that we would  
5 be in this court today if these Ludacris and unconscionable things were not happening. There is  
6 proof. Let’s see if the honorable Jay Ford is going to ever give me the proper consideration and  
7 allow me due process. The honorable Judge J Ford is the one who insisted that I get an attorney.  
8 Once I hired an attorney, I realized the reason why it was so important to have one so that my due  
9 process would be respected. Now, even with an attorney, when I was incarcerated and could not  
10 respond, the honorable judge J Ford pressed forward with my lawsuit when I was unable to  
11 participate and did not understand the proper processes.

12

13 **REQUEST FOR ADMISSION NO. 50:**

14 Admit that PIERATTINI has never created a fake username in YOUR name or in the name  
15 of one of YOUR friends.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 50:**

17 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
18 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
19 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

20 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 50:**

21 *I never created a fake username to interact with Michael Pertini on social media, on*  
22 *discord or through email or phone. I’ve never been interested in Michael Pertini, I never wanted*  
23 *to be involved with him, I certainly wouldn’t spend any time, pretending to be someone else and*  
24 *participating on his live streams. Now that I have been forced to watch this narcissist’s content, I*  
25 *see(and hear) on dozens of occasions where he addresses me directly, as though I as someone*  
26 *posing as another username, in the chat. This is completely false. Narcissist like Michael Pertini,*  
27 *believe that people who are prime movers would be interested in the parasites, sucking off of*  
28 *them. I am not, and I did not participate at all whatsoever. The only time I ever watched his*

1 *content was when I was forced to because he interrupted my live streams, as I was doing my job.*

2  
3 **REQUEST FOR ADMISSION NO. 51:**

4 Admit that YOU have never been previously been asked to leave locations based on any  
5 alleged acts or statements by PIERATTINI.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 51:**

7 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
8 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
9 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

10 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 51:**

11 *I was, in fact, essentially kicked out of an Airbnb. As Michael Pertini conspired with,*  
12 *“Troll mafia official” to ensure this. That’s the entire thing about a conspiracy and why there are*  
13 *multiple defendants, that way they can all pass the blame on and say it wasn’t me.*

14  
15 **REQUEST FOR ADMISSION NO. 52:**

16 Admit that PIERATTINI has never had “obvious, malicious intentions” to cause YOU fear  
17 and panic.

18 **RESPONSE TO REQUEST FOR ADMISSION NO. 52:**

19 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
20 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
21 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

22 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 52:**

23 *He absolutely did exactly that. As stated in previous answers, in his live streams, being*  
24 *submitted today regarding the, “right of publicity”, his users are using, and creating screen*  
25 *names, docking my exact location, even my exact location where I’m driving on the freeway. When*  
26 *you are asleep in an Airbnb in the middle of nowhere, and Michael Pertini is conspiring to post*  
27 *your location, even up to where you are on the freeway, that is obvious malicious intent to cause*  
28 *me fear and panic.*

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**REQUEST FOR ADMISSION NO. 54:**

Admit that YOU have not been harassed at YOUR residences in New Hampshire, Boston, New Mexico, Colorado, Nevada and/or California by PIERATTINI.

**RESPONSE TO REQUEST FOR ADMISSION NO. 54:**

Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2) Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed limit. Plaintiff requests the opportunity to further object to these if they are later granted.

**SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 54:**

*I absolutely have been harassed in all of those states and locations. Michael Pertini's deep involvement with, "Troll mafia official" and his codefendant; absolutely harassed me in every one of these places. Michael Pertini is 100% guilty of doing these things.*

**REQUEST FOR ADMISSION NO. 55:**

Admit that YOU have not suffered any alleged vandalism by PIERATTINI.

**RESPONSE TO REQUEST FOR ADMISSION NO. 55:**

Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2) Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed limit. Plaintiff requests the opportunity to further object to these if they are later granted.

**SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 55:**

*There was vandalism done at my location in Colorado, where Michael Pertini conspired with other members of, "Troll mafia official" to put dog shit on my doorstep and then put Nutella on my door knob, breaking the door knob. There are screenshots from the discord where Michael Pertini completely denies having anything to do with something like this. He is being sarcastic, it is absolute reverse psychology, just like a racist, dog whistle, "I would never recommend that you hang blacks from the tree using a Noose". Michael Pertini's character has been revealed as he has posed as a fake military police officer working in narcotics. He plays the tuba in the band.*

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**REQUEST FOR ADMISSION NO. 56:**

Admit that PIERATTINI did not allegedly steal YOUR van.

**RESPONSE TO REQUEST FOR ADMISSION NO. 56:**

Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2) Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed limit. Plaintiff requests the opportunity to further object to these if they are later granted.

**SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 56:**

*Michael Pertini worked in a conspiracy to dox my location which led to the theft of my van. That is why there are multiple defendants in this lawsuit. I'm sure that the honorable judge J Ford must have some experience where people like Michael Pertini conspire with others. It's not like this is brand new. The number one case for the federal government against citizens of this country is conspiracy. Michael pertini. is a conspirator.*

**REQUEST FOR ADMISSION NO. 57:**

Admit that PIERATTINI has never taken credit for allegedly stealing YOUR van.

**RESPONSE TO REQUEST FOR ADMISSION NO. 57:**

Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2) Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed limit. Plaintiff requests the opportunity to further object to these if they are later granted.

**SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 57:**

That's true, he did the opposite. He stated, "I would never be a part of stealing Chille's van."

**REQUEST FOR ADMISSION NO. 58:**

Admit that PIERATTINI has never stated that your allegedly stolen van is "under water" and "will never be found."

**RESPONSE TO REQUEST FOR ADMISSION NO. 58:**

Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)

1 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
2 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

3 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 58:**

4 *Michael Pertini absolutely stated that and I have a screenshot of that from the discord*  
5 *account, "Troll mafia official". Of course Michael Pertini was using the username, "Sergeant*  
6 *blue bacon" the exact same screen name he uses across all of social media. Do I believe that*  
7 *Michael Pertini has multiple screen names and that he uses aliases? Absolutely. However in this*  
8 *particular instance, he used the username, "Sergeant blue Bacon" - Trolls in the discord account*  
9 *do not allow other trolls to pretend to be the troll that they are not. Stated another way; Parasites*  
10 *insist that you be the parasite that you are and not try to pretend that you are a different parasite.*

11  
12 **REQUEST FOR ADMISSION NO. 59:**

13 Admit that PIERATTINI has never used YOUR location information to cause damage,  
14 intimidate, and "instill fear" in YOU and people around YOU.

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 59:**

16 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
17 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
18 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

19 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 59:**

20 *He absolutely stalked, tracked, and tried to use my location to instill fear in me. The*  
21 *screenshots from his live stream submitted today, show this fact.*

22  
23 **REQUEST FOR ADMISSION NO. 61:**

24 Admit that PIERATTINI has never called a gas station attendant at a gas station at which  
25 YOU were filling gas.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 61:**

27 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
28 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed



1 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

2 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 61:**

3 *Michael Pertini conspired with members in, "Troll mafia official" to stalk me, track me*  
4 *and harass me. Even when I was live streaming from a gas station, pretty much in the middle of*  
5 *nowhere, the trolls with Michael Pertini did exactly that. Surely the honorable Jay Ford*  
6 *understands that people work in conspiracies.*

7  
8 **REQUEST FOR ADMISSION NO. 62:**

9 Admit that PIERATTINI has not contacted the hosts of accommodations YOU have stayed  
10 at while traveling.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 62:**

12 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
13 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
14 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

15 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 62:**

16 *He did exactly that. He conspired with other members of, "Troll mafia official" to stock,*  
17 *harass, and Two defame my name and my reputation; that includes my Airbnb locations. I was*  
18 *kicked out of an Airbnb location because Michael Pertini along with dozens of other trolls, self-*  
19 *described trolls, from troll mafia official, contacted the host of the house I was staying at in*  
20 *Denver.*

21  
22  
23 **REQUEST FOR ADMISSION NO. 63:**

24 Admit that PIERATTINI has never stated "Did you know that DeCastro is a dangerous  
25 man who carries guns and is wanted by the police in multiple states" to the hosts of  
26 accommodations YOU have stayed at while traveling.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 63:**

28 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)

1 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
2 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

3 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 63:**

4 *He did exactly that and there is a screenshot from the discord proving that he made that*  
5 *statement exactly. I can provide that evidence if I am only allowed proper consideration and do*  
6 *process by the honorable judge J Ford.*

7  
8 **REQUEST FOR ADMISSION NO. 64:**

9 Admit that the individual who allegedly drove up to YOU and YOUR roommate in a  
10 vehicle with Florida license plates on October 6, 2022, was not PIERATTINI.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 64:**

12 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
13 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
14 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

15 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 64:**

16 *Michael Pertini, along with members of Troll, mafia official, sent over codefendant, “Dan*  
17 *Clemente” to do exactly that. The letter being submitted today by Mr. David Condon, corroborate*  
18 *this fact. Mr. Condon has written a letter that I will submit to the court today. Mr. Condon is an*  
19 *accredited, investor, with no criminal record and an impeccable reputation.*

20  
21 **REQUEST FOR ADMISSION NO. 65:**

22 Admit that PIERATTINI has never said to you “I see you, Chille! I know where you live!  
23 Kate always wins!”

24 **RESPONSE TO REQUEST FOR ADMISSION NO. 65:**

25 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
26 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
27 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

28 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 65:**

1           *That is true however he was a part of the Troll mafia who sent codefendant, Dan*  
2 *Clemente” to approach me on Hollywood Boulevard and say exactly those words. This is on*  
3 *video. Michael Pertini was actively participating in the discord account, “Troll mafia official”.*  
4 *Perhaps the honorable Judge J Ford will allow me to submit the screenshots that show that he*  
5 *was actively participating where members of Troll mafia official, paid Dan Clemente to approach*  
6 *me on Hollywood Boulevard and threatened to fight me. No journalist should have to deal or*  
7 *endure this kind of never-ending cyber stocking, harassing and defamation.*

8  
9 **REQUEST FOR ADMISSION NO. 66:**

10           Admit that PIERATTINI has never come to YOUR house and threatened YOU and/or  
11 YOUR roommate.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 66:**

13           Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
14 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
15 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

16 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 66:**

17           *I’ve never seen Michael Piattini at my house- I did see Dan Clemente pull up to me and do*  
18 *exactly that, and that’s the reason why he is Michael Pertini’s codefendant. Because Michael*  
19 *Pertini was involved with all that. With the vast experience, the honorable Judge J Ford Hass,*  
20 *perhaps he seen similar cases where things like this have happened where multiple people were in*  
21 *a conspiracy.*

22  
23 **REQUEST FOR ADMISSION NO. 67:**

24           Admit that YOUR mother has never received an allegedly harassing phone call from  
25 PIERATTINI.

26 **RESPONSE TO REQUEST FOR ADMISSION NO. 67:**

27           Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
28 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed

1 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

2 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 67:**

3 *I cannot admit or deny this because Michael Pertini uses fake phone numbers and works in*  
4 *a conspiracy with dozens, hundreds and even thousand members of, “Troll mafia official”. I can*  
5 *and I have submitted dozens and dozens of screenshots of phone calls that I have received from*  
6 *Google numbers or line 2 numbers; these are commonly used in the place of your phone number*  
7 *so that you can hide your identity. Additionally, I have dozens if not, hundreds of voicemails, one*  
8 *even from Michael Pertini, leaving a voicemail on my answering machine, harassing me.*  
9 *Meaning, it’s not hard to extrapolate, that Michael Pertini has done this exact same thing to my*  
10 *mother. In the discovery that Michael Pertini submitted, Michael Pertini continually pushes and*  
11 *urges his codefendant, David Omo, that he has stories about my mother. Who does that?*

12  
13 **REQUEST FOR ADMISSION NO. 68:**

14 Admit that no one in YOUR immediate or extended family has ever received an allegedly  
15 harassing phone call from PIERATTINI.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 68:**

17 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
18 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
19 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

20 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 68:**

21 *Again, Michael Pertini is working in a conspiracy with, “Troll mafia official”. And even*  
22 *though I am not being given consideration, and certainly being denied to process, I’m sure the*  
23 *honorable judge J Ford has seen similar cases where people were in a conspiracy to pass the buck*  
24 *of responsibility..*

25 **REQUEST FOR ADMISSION NO. 69:**

26 Admit that none of YOUR “smalltown-friends” has ever received an allegedly harassing  
27 phone call from PIERATTINI.

28 **RESPONSE TO REQUEST FOR ADMISSION NO. 69:**

1 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
2 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
3 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

4 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 69:**

5 *Dozens of my “small town friends” have received inquiries from Kate Peter, working as*  
6 *the agent, and co-conspirator, of Michael Pertini. I can provide written statements from several of*  
7 *my hometown friends, who I have known since I was five years old. Again, this is a conspiracy,*  
8 *and that is why there are multiple codefendant. If I had known the process and had more money,*  
9 *there would be even more defendants.*

10  
11  
12 **REQUEST FOR ADMISSION NO. 70:**

13 Admit that PIERATTINI has not contacted any of the “62 young men” YOU graduated  
14 with in 1992

15 **RESPONSE TO REQUEST FOR ADMISSION NO. 70:**

16 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
17 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
18 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

19 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 70:**

20 *That’s absolutely not true. As a matter of fact, I can get a letter from a couple of those*  
21 *people and get those letters notarized. Whether it was Michael Pertini or Michael Pertini working*  
22 *in conspiracy with, “Troll mafia official”, these things have happened.*

23  
24 **REQUEST FOR ADMISSION NO. 71:**

25 Admit that YOUR roommate, David Condon, has never experienced any alleged  
26 harassment, trespass, and/or vandalism from PIERATTINI.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 71:**

28 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)

1 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
2 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

3 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 71:**

4 *In the letter being submitted today, David Condon clearly identifies these things as fact; he*  
5 *has received dozens of phone calls from random people. Michael Pertini is working in a*  
6 *conspiracy way with other members of, "Troll mafia official" which is why there are multiple*  
7 *defendants in this case.*

8  
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10 **REQUEST FOR ADMISSION NO. 72:**

11 Admit that none of YOUR alleged previous investors, colleagues, and co-workers have  
12 received calls questioning who YOU are and warning that YOU have "become a danger to them  
13 and they should stay away from [YOU], 'if they know what's good for them'" from PIERATTINI.

14 **RESPONSE TO REQUEST FOR ADMISSION NO. 72:**

15 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
16 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
17 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

18 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 72:**

19 *Many of my former coworkers, investors, friends, family have received phone calls stating*  
20 *these exact things. Michael Pertini is working in a conspiracy with thousands of other people. If*  
21 *the honorable judge J Ford will allow me to process and allow me to submit my evidence, I can*  
22 *prove these things. Of course, Michael Pertini is working under the fake name, "Sergeant blue*  
23 *bacon" because he was never a military police officer investigating narcotics.*

24 **REQUEST FOR ADMISSION NO. 73:**

25 Admit that PIERATTINI has not sent YOU any allegedly harassing emails "forged to look  
26 like they're from a court, two to three times a day since at least November 2022".

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 73:**

28 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)

1 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
2 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

3 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 73:**

4 *That is absolutely true, and I will be submitting screenshots of those correspondence*  
5 *today. And then in the discovery that Michael Pertini submitted, he's discussing this with his co-*  
6 *conspirators.*

7 **REQUEST FOR ADMISSION NO. 74:**

8 Admit that PIERATTINI did not tell the owners of the property where Mr. Kane was  
9 residing that YOU were armed, dangerous, and wanted by the FBI.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 74:**

11 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
12 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
13 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

14 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 74:**

15 *Again, Michael Pertini is working in a conspiracy. Michael Pertini is deeply involved with,*  
16 *"Troll mafia official". In the screenshots from his live stream today, during his live chat,*  
17 *codefendant, David Omo (also known as team skeptic), where Omo clearly POSTS a comment in*  
18 *the livestream that that he will speak with Michael Pertini in the discord "troll mafia official"*  
19 *after his(Pierattini's) live stream ends.*

20

21

22 **REQUEST FOR ADMISSION NO. 75:**

23 Admit that PIERATTINI has not have used YOUR likeness to advertise any YouTube  
24 videos about YOU.

25 **RESPONSE TO REQUEST FOR ADMISSION NO. 75:**

26 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
27 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
28 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

1 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 75:**

2 *Is this a joke? The screenshots of the thumbnails from Michael Pertini's YouTube account*  
3 *called, "blue bacon" clear clearly show that Michael Pertini's intent was to stock, harassed,*  
4 *defame, and to use my likeness, "right to publicity" to make money Michael Pertini only makes*  
5 *money when he makes videos about other people deframing them. He has very limited views on*  
6 *any video that he produces where he is not cutting down another person.*

7

8

9 **REQUEST FOR ADMISSION NO. 76:**

10 Admit that PIERATTINI has not gained a commercial benefit from any alleged wrongful  
11 actions alleged in YOUR Complaint

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 76:**

13 Plaintiff objects in full on the following grounds: 1) Number of requests exceeded; 2)  
14 Unduly burdensome due to the number of frivolous, duplicative, and number over the allowed  
15 limit. Plaintiff requests the opportunity to further object to these if they are later granted.

16 **SUPPLEMENTAL RESPONSE TO REQUEST FOR ADMISSION NO. 76:**

17 *Michael Pertini has absolutely gained commercial benefit from making videos about me to*  
18 *framing me, cyber stocking, tracking, and harassing me. All of this is proof in the screenshots*  
19 *from his live stream, only four live streams, that we are submitting today. You can read the chat*  
20 *section of the screenshots and clearly see that this is exactly what Michael did. He made*  
21 *thousands and thousands of dollars by using my likeness to make money. It's documented.*

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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

*DeCastro v. Peter, et al.*, Los Angeles County Superior Court Case No 23SMCV00538

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action; my business address is 8383 Wilshire Blvd., Suite 800, Beverly Hills, CA 90211.

On January 10, 2025, I served the following document(s) on the interested parties in this action:  
**PLAINTIFF JOSE DECASTRO'S SUPPLEMENTAL RESPONSES TO DEFENDANT MICHAEL PIERATTINI'S REQUESTS FOR ADMISSION TO PLAINTIFF JOSE DECASTRO, SET ONE**

by placing true copies thereof enclosed in sealed envelopes addressed as follows:

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

*Attorneys for Defendant*  
Michael Pierattini

(BY E-MAIL) Pursuant to CCP § 1010.6, based on the named party's electronic filing in this case being deemed assent to electronic service under the local rules, I sent such document to the individual(s) identified at the email address referenced above.

(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct

Executed on January 22, 2025, at Los Angeles, California.

  
Steven T. Gebelin

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**EXHIBIT 4**

Plaintiff Jose DeCastro's Supplemental Responses To Defendant Michael Pierattini's Form Interrogatories, Set One

1 **LESOWITZ GEBELIN LLP**  
Steven T. Gebelin, Esq. (Bar No. 261507)  
2 steven@lawbylg.com  
8383 Wilshire Blvd., Suite 800  
3 Beverly Hills, CA 90211  
4 Telephone: (310) 341-3072  
Facsimile: (310) 341-3070  
5 Attorneys for Plaintiff Jose DeCastro

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **COUNTY OF LOS ANGELES, SANTA MONICA COURTHOUSE**

9 JOSE DECASTRO,  
10  
11 Plaintiff,  
12 V.  
13 KATHERINE PETER; DANIEL  
CLEMENT; MICHAEL PIERATTINI;  
14 DAVID OMO JR.; and DOES 1 TO 30,  
15 inclusive,  
16 Defendants.

Case No.: 23SMCV00538  
Assigned for all Purposes to  
*Hon. H. Jay Ford III*, Department O  
**PLAINTIFF JOSE DECASTRO'S  
SUPPLEMENTAL RESPONSES TO  
DEFENDANT MICHAEL PIERATTINI'S  
FORM INTERROGATORIES, SET ONE**  
Case Filed: February 6, 2023  
Trial Date: February 24, 2025

18 PROPOUNDING PARTY: **DEFENDANT MICHAEL PIERATTINI**  
19 RESPONDING PARTY: **PLAINTIFF JOSE DECASTRO**  
20 SET NUMBER: ONE (1)  
21  
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1 Pursuant to California Code of Civil Procedure § 2031.010, *et seq.*, and this Court’s Order  
2 dated May 2, 2024, Plaintiff JOSE DECASTRO (“Plaintiff” or “Responding Party”) hereby  
3 supplements his response to these Demands for FORM INTERROGATORIES, as follows:

4 **FORM INTERROGATORY NO. 1.1:**

5 State the name, **ADDRESS**, telephone number, and relationship to you of each **PERSON**  
6 who prepared or assisted in the preparation of the responses to these interrogatories. (*Do not*  
7 *identify anyone who simply typed or reproduced the responses.*)

8 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 1.1:**

9  
10 **FORM INTERROGATORY NO. 2.1:**

11 State: (a) your name; (b) every name you have used in the past; and (c) the dates you used  
12 each name.

13 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.1:**

14 Jose DeCastro. Chille.

15 **FORM INTERROGATORY NO. 2.2:**

16 State the date and place of your birth.

17 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.2:**

18 California

19 **FORM INTERROGATORY NO. 2.3:**

20 At the time of the **INCIDENT**, did you have a driver's license? If so state: (a) the state or  
21 other issuing entity; (b) the license number and type; (c) the date of issuance; and (d) all  
22 restrictions.

23 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.3:**

24 n/a

25 **FORM INTERROGATORY NO. 2.4:**

26 At the time of the **INCIDENT**, did you have any other permit or license for the operation  
27 of a motor vehicle? If so, state: (a) the state or other issuing entity; (b) the license number and  
28 type; (c) the date of issuance; and (d) all restrictions.

1 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.4:**

2 n/a

3 **FORM INTERROGATORY NO. 2.5:**

4 State: (a) your present residence **ADDRESS**; (b) your residence **ADDRESSES** for the  
5 past five years; and (c) the dates you lived at each **ADDRESS**.

6 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.5:**

7 1258 Franklin, Santa Monica, CA 90404

8 **FORM INTERROGATORY NO. 2.6:**

9 State: (a) the name, **ADDRESS**, and telephone number of your present employer or place  
10 of self-employment; and (b) the name, **ADDRESS**, dates of employment, job title, and nature of  
11 work for each employer or self-employment you have had from five years before the **INCIDENT**  
12 until today.

13 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.6:**

14 No. It's irrelevant. "The Incident" is why Michael Pierattini got himself sued.

15 **FORM INTERROGATORY NO. 2.7:**

16 State: (a) the name and **ADDRESS** of each school or other academic or vocational  
17 institution you have attended, beginning with high school; (b) the dates you attended; (c) the  
18 highest grade level you have completed; and (d) the degrees received

19 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.7:**

20 No.

21

22

23 **FORM INTERROGATORY NO. 2.8:**

24 Have you ever been convicted of a felony? If so, for each conviction state: (a) the city and  
25 state where you were convicted; (b) the date of conviction; (c) the offense; and (d) the court and  
26 case number.

27 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.8:**

28 No, I have not.

1 **FORM INTERROGATORY NO. 2.9:**

2 Can you speak English with ease? If not, what language and dialect do you normally use?

3 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.9:**

4 Yup, English.

5 **FORM INTERROGATORY NO. 2.10:**

6 Can you read and write English with ease? If not, what language and dialect do you  
7 normally use?

8 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.10:**

9 English is a good language.

10 **FORM INTERROGATORY NO. 2.10:**

11 Can you read and write English with ease? If not, what language and dialect do you  
12 normally use?

13 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.10:**

14 English

15

16 **FORM INTERROGATORY NO. 2.11:**

17 At the time of the INCIDENT were you acting as an agent or employee for any PERSON?  
18 If so, state: (a) the name, ADDRESS, and telephone number of that PERSON; and (b) a  
19 description of your duties.

20 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.11:**

21 n/a

22

23 **FORM INTERROGATORY NO. 2.12:**

24 At the time of the INCIDENT did you or any other person have any physical, emotional,  
25 or mental disability or condition that may have contributed to the occurrence of the INCIDENT?  
26 If so, for each person state: (a) the name, ADDRESS, and telephone number; (b) the nature of the  
27 disability or condition; and (c) the manner in which the disability or condition contributed to the  
28 occurrence of the INCIDENT.

1 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.12:**

2 No. I won't put my friends and family "out" on a public document.

3 **FORM INTERROGATORY NO. 2.13:**

4 Within 24 hours before the **INCIDENT** did you or any person involved in the **INCIDENT**  
5 use or take any of the following substances: alcoholic beverage, marijuana, or other drug or  
6 medication of any kind (prescription or not)? If so, for each person state: (a) the name,  
7 **ADDRESS**, and telephone number; (b) the nature or description of each substance; (c) the  
8 quantity of each substance used or taken; (d) the date and time of day when each substance was  
9 used or taken; (e) the **ADDRESS** where each substance was used or taken; (f) the name,  
10 **ADDRESS**, and telephone number of each person who was present when each substance was  
11 used or taken; and (g) the name, **ADDRESS**, and telephone number of any **HEALTH CARE**  
12 **PROVIDER** who prescribed or furnished the substance and the condition for which it was  
13 prescribed or furnished.

14 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 2.13:**

15 I don't drink, smoke or do drugs.

16 **FORM INTERROGATORY NO. 4.1:**

17 At the time of the **INCIDENT**, was there in effect any policy of insurance through which  
18 you were or might be insured in any manner (for example, primary, pro-rata, or excess liability  
19 coverage or medical expense coverage) for the damages, claims, or actions that have arisen out of  
20 the **INCIDENT**? If so, for each policy state:

21 (a) the kind of coverage;

22 (b) the name and **ADDRESS** of the insurance company;

23 (c) the name, **ADDRESS**, and telephone number of each named insured;

24 (d) the policy number;

25 (e) the limits of coverage for each type of coverage contained in the policy;

26 (f) whether any reservation of rights or controversy or coverage dispute exists between you  
27 and the insurance company; and

28 (g) the name, **ADDRESS**, and telephone number of the custodian of the policy.



1 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 4.1:**

2 n/a

3 **FORM INTERROGATORY NO. 4.2:**

4 Are you self-insured under any statute for the damages, claims, or actions that have arisen  
5 out of the INCIDENT? If so, specify the statute.

6 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 4.2:**

7 n/a

8 **FORM INTERROGATORY NO. 6.1:**

9 Do you attribute any physical, mental, or emotional injuries to the INCIDENT? (*If your answer*  
10 *is "no," do not answer interrogatories 6.2 through 6.7).*

11 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 6.1**

12 n/a

13 **FORM INTERROGATORY NO. 6.2:**

14 Identify each injury you attribute to the INCIDENT and the area of your body affected.

15 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 6.2:**

16 n/a

17 **FORM INTERROGATORY NO. 6.3:**

18 Do you still have any complaints that you attribute to the INCIDENT? If so, for each  
19 complaint state: (a) a description; (b) whether the complaint is subsiding, remaining the same, or  
20 becoming worse; and (c) the frequency and duration.

21 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 6.3:**

22 n/a

23 **FORM INTERROGATORY NO. 6.4:**

24 Did you receive any consultation or examination (except from expert witnesses covered  
25 by Code of Civil Procedure sections 2034.210–2034.310) or treatment from a HEALTH CARE  
26 PROVIDER for any injury you attribute to the INCIDENT? If so, for each HEALTH CARE  
27 PROVIDER state: (a) the name, ADDRESS, and telephone number; (b) the type of consultation,  
28

1 examination, or treatment provided; (c) the dates you received consultation, examination, or  
2 treatment; and (d) the charges to date.

3 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 6.4:**

4 n/a

5 **FORM INTERROGATORY NO. 6.5:**

6 Have you taken any medication, prescribed or not, as a result of injuries that you attribute  
7 to the **INCIDENT**? If so, for each medication state: (a) the name; (b) the **PERSON** who  
8 prescribed or furnished it; (c) the date it was prescribed or furnished; (d) the dates you began and  
9 stopped taking it; and (e) the cost to date.

10 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 6.5:**

11 Hipaa

12  
13 **FORM INTERROGATORY NO. 6.6:**

14 Are there any other medical services necessitated by the injuries that you attribute to the  
15 **INCIDENT** that were not previously listed (for example, ambulance, nursing, prosthetics)? If so,  
16 for each service state: (a) the nature; (b) the date; (c) the cost; and (d) the name, **ADDRESS**, and  
17 telephone number of each provider.

18 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 6.6:**

19 n/a

20  
21 **FORM INTERROGATORY NO. 6.7:**

22 Has any **HEALTH CARE PROVIDER** advised that you may require future or  
23 additional treatment for any injuries that you attribute to the **INCIDENT**? If so, for each injury  
24 state: (a) the name and **ADDRESS** of each **HEALTH CARE PROVIDER**; (b) the complaints  
25 for which the treatment was advised; and (c) the nature, duration, and estimated cost of the  
26 treatment.

27 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 6.7:**

28 n/a

1 **FORM INTERROGATORY NO. 7.1:**

2 Do you attribute any loss of or damage to a vehicle or other property to the **INCIDENT**?  
3 If so, for each item of property: (a) describe the property; (b) describe the nature and location of  
4 the damage to the property; (c) state the amount of damage you are claiming for each item of  
5 property and how the amount was calculated; and (d) if the property was sold, state the  
6 name, **ADDRESS**, and telephone number of the seller, the date of the sale, and the sale price.

7 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 7.1:**

8 n/a  
9

10 **FORM INTERROGATORY NO. 7.2:**

11 Has a written estimate or evaluation been made for any item of property referred to in you  
12 answer to the preceding interrogatory? If so, for each estimate or evaluation state: (a) the name,  
13 **ADDRESS**, and telephone number of the **PERSON** who prepared it and the date prepared; (b)  
14 the name, **ADDRESS**, and telephone number of each **PERSON** who has a copy of it; and (c) the  
15 amount of damage stated.

16 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 7.2:**

17 n/a  
18

19 **FORM INTERROGATORY NO. 7.3:**

20 Has any item of property referred to in your answer to interrogatory 7.1 been repaired? If  
21 so, for each item state: (a) the date repaired; (b) a description of the repair; (c) the repair cost;  
22 (d) the name, **ADDRESS**, and telephone number of the **PERSON** who repaired it; and (e) the  
23 name, **ADDRESS**, and telephone number of the **PERSON** who paid for the repair.

24 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 7.3:**

25 **n/a**  
26

27 **FORM INTERROGATORY NO. 9.1:**  
28

1 Are there any other damages that you attribute to the **INCIDENT**? If so, for each item of  
2 damage state: (a) the nature; (b) the date it occurred; (c) the amount; and (d) the name,  
3 **ADDRESS**, and telephone number of each **PERSON** to whom an obligation was incurred.

4 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 9.1:**

5 *No, I won't put other's information out for "The Troll Mafia"*

6 **FORM INTERROGATORY NO. 9.2:**

7 Do any **DOCUMENTS** support the existence or amount of any item of damages claimed  
8 in interrogatory 9.1? If so, describe each document and state the name, **ADDRESS**, and  
9 telephone number of the **PERSON** who has each **DOCUMENT**.

10 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 9.2:**

11  
12 *n/a*

13  
14 **FORM INTERROGATORY NO. 11.1:**

15 Except for this action, in the past 10 years have you filed an action or made a written  
16 claim or demand for compensation for your personal injuries? If so, for each action, claim, or  
17 demand state: (a) the date, time, and place and location (closest street **ADDRESS** or intersection)  
18 of the **INCIDENT** giving rise to the action, claim, or demand; (b) the name, **ADDRESS**, and  
19 telephone number of each **PERSON** against whom the claim or demand was made or the action  
20 filed; (c) the court, names of the parties, and case number of any action filed; (d) the name,  
21 **ADDRESS**, and telephone number of any attorney representing you; (e) whether the claim or  
22 action has been resolved or is pending; and (f) a description of the injury.

23 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 11.1:**

24 *I have not received any compensation for any personal injury in the past 10 years*

25  
26 **FORM INTERROGATORY NO. 11.2:**

27 In the past 10 years have you made a written claim or demand for workers' compensation  
28 benefits? If so, for each claim or demand state: (a) the date, time, and place of the **INCIDENT**

1 giving rise to the claim; (b) the name, **ADDRESS**, and telephone number of your employer at the  
2 time of the injury; (c) the name, **ADDRESS**, and telephone number of the workers' compensation  
3 insurer and the claim number; (d) the period of time during which you received workers'  
4 compensation benefits; (e) a description of the injury; (f) the name, **ADDRESS**, and telephone  
5 number of any **HEALTH CARE PROVIDER** who provided services; and (g) the case number  
6 at the Workers' Compensation Appeals Board.

7 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 11.2:**

8 *No. I won't release any information about anybody I work with, friends or family members.*  
9 *My associates and friends have submitted letters that I'll submit to the court.*

10  
11  
12 **FORM INTERROGATORY NO. 12.1:**

13 State the name, **ADDRESS**, and telephone number of each individual: (a) who witnessed  
14 the **INCIDENT** or the events occurring immediately before or after the **INCIDENT**; (b) who  
15 made any statement at the scene of the **INCIDENT**; (c) who heard any statements made about  
16 the **INCIDENT** by any individual at the scene; and (d) who **YOU OR ANYONE ACTING ON**  
17 **YOUR BEHALF** claim has knowledge of the **INCIDENT** (except for expert witnesses covered  
18 by Code of Civil Procedure section 2034).

19 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 12.1:**

20 *Four People have submitted statements.*

21 **FORM INTERROGATORY NO. 12.2:**

22 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** interviewed any individual  
23 concerning the **INCIDENT**? If so, for each individual state: (a) the name, **ADDRESS**, and  
24 telephone number of the individual interviewed; (b) the date of the interview; and (c) the name,  
25 **ADDRESS**, and telephone number of the **PERSON** who conducted the interview.

26 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 12.2:**

27 *No. I won't be putting my mom, sisters, family or friends here.*  
28

1 **FORM INTERROGATORY NO. 12.3:**

2 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** obtained a written or recorded  
3 statement from any individual concerning the **INCIDENT**? If so, for each statement state: (a)  
4 the name, **ADDRESS**, and telephone number of the individual from whom the statement was  
5 obtained; (b) the name, **ADDRESS**, and telephone number of the individual who obtained the  
6 statement; (c) the date the statement was obtained; and (d) the name, **ADDRESS**, and telephone  
7 number of each **PERSON** who has the original statement or a copy.

8 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 12.3:**

9 *I'm not sure what "Incident" this is about. There have been several things that happened*  
10 *during the stalking & harassing. The defamation & right of publicity.*  
11

12 **FORM INTERROGATORY NO. 12.4:**

13 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any photographs,  
14 films, or videotapes depicting any place, object, or individual concerning the **INCIDENT** or  
15 plaintiff's injuries? If so, state: (a) the number of photographs or feet of film or videotape; (b) the  
16 places, objects, or persons photographed, filmed, or videotaped; (c) the date the photographs,  
17 films, or videotapes were taken; (d) the name, **ADDRESS**, and telephone number of the  
18 individual taking the photographs, films, or videotapes; and (e) the name, **ADDRESS**, and  
19 telephone number of each **PERSON** who has the original or a copy of the photographs, films, or  
20 videotapes.

21 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 12.4:**

22 *There are plenty of videos and evidence from discord.*  
23

24 **FORM INTERROGATORY NO. 12.5:**

25 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any diagram,  
26 reproduction, or model of any place or thing (except for items developed by expert witnesses  
27 covered by Code of Civil Procedure sections 2034.210– 2034.310) concerning the **INCIDENT**?  
28

1 If so, for each item state: (a) the type (i.e., diagram, reproduction, or model); (b) the subject  
2 matter; and (c) the name, ADDRESS, and telephone number of each PERSON who has it

3 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 12.5:**

4 *n/a*

5  
6 **FORM INTERROGATORY NO. 12.6:**

7 Was a report made by any PERSON concerning the INCIDENT? If so, state: (a) the  
8 name, title, identification number, and employer of the PERSON who made the report; (b) the  
9 date and type of report made; (c) the name, ADDRESS, and telephone number of the PERSON  
10 for whom the report was made; and (d) the name, ADDRESS, and telephone number of each  
11 PERSON who has the original or a copy of the report

12 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 12.6:**

13 *Four people have submitted statement, please refer to those*

14  
15 **FORM INTERROGATORY NO. 12.7:**

16 Have YOU OR ANYONE ACTING ON YOUR BEHALF inspected the scene of the  
17 INCIDENT? If so, for each inspection state: (a) the name, ADDRESS, and telephone number of  
18 the individual making the inspection (except for expert witnesses covered by Code of Civil  
19 Procedure sections 2034.210–2034.310); and (b) the date of the inspection.

20 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 12.7:**

21 *I don't know what "Incident" is being referred to.*

22  
23 **FORM INTERROGATORY NO. 13.1:**

24 Have YOU OR ANYONE ACTING ON YOUR BEHALF conducted surveillance of  
25 any individual involved in the INCIDENT or any party to this action? If so, for each surveillance  
26 state: (a) the name, ADDRESS, and telephone number of the individual or party; (b) the time,  
27 date, and place of the surveillance; (c) the name, ADDRESS, and telephone number of the  
28 individual who conducted the surveillance; and (d) the name, ADDRESS, and telephone number

1 of each **PERSON** who has the original or a copy of any surveillance photograph, film, or  
2 videotape.

3 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 13.1:**

4 *n/a*

7 **FORM INTERROGATORY NO. 13.2:**

8 Has a written report been prepared on the surveillance? If so, for each written report state:  
9 (a) the title; (b) the date; (c) the name, **ADDRESS**, and telephone number of the individual who  
10 prepared the report; and (d) the name, **ADDRESS**, and telephone number of each **PERSON** who  
11 has the original or a copy.

12 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 13.2:**

13 *n/a*

15 **FORM INTERROGATORY NO. 14.1:**

16 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** contend that any **PERSON**  
17 involved in the **INCIDENT** violated any statute, ordinance, or regulation and that the violation  
18 was a legal (proximate) cause of the **INCIDENT**? If so, identify the name, **ADDRESS**, and  
19 telephone number of each **PERSON** and the statute, ordinance, or regulation that was violated.

20 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 14.1:**

21  
22 *n/a*

24 **FORM INTERROGATORY NO. 14.2:**

25 Was any **PERSON** cited or charged with a violation of any statute, ordinance, or  
26 regulation as a result of this **INCIDENT**? If so, for each **PERSON** state: (a) the name,  
27 **ADDRESS**, and telephone number of the **PERSON**; (b) the statute, ordinance, or regulation  
28 allegedly violated; (c) whether the **PERSON** entered a plea in response to the citation or charge



1 and, if so, the plea entered; and (d) the name and **ADDRESS** of the court or administrative  
2 agency, names of the parties, and case number.

3 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 14.2:**

4

5 *n/a*

6

7 **FORM INTERROGATORY NO. 17.1:**

8 Is your response to each request for admission served with these interrogatories an unqualified  
9 admission? If not, for each response that is not an unqualified admission:

10 a) state the number of the request; b) state all facts upon which you base your response; c) state  
11 the names, ADDRESSES, and telephone numbers of all PERSONS who have knowledge of those  
12 facts; and d) identify all DOCUMENTS and other tangible things that support your response and  
13 state the name, ADDRESS, and telephone number of the PERSON who has each DOCUMENT  
14 or thing.

15 **SUPPLEMENTAL RESPONSE TO FORM INTERROGATORY NO. 17.1:**

16 *I will not be listing the names of my mother, family members, coworkers, colleagues, investors,*  
17 *or anything of the sort in any sort of public document. Four people have written letters on my*  
18 *behalf and will testify to the statements made in those letters or even give it a sworn statement.*  
19 *However, in dealing with, “the Troll mafia”, I will not be submitting any of my personal*  
20 *contact information in public documents. I’m the one suing Michael Pertini, I’m not being*  
21 *sued.*

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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

*DeCastro v. Peter, et al.*, Los Angeles County Superior Court Case No 23SMCV00538

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action; my business address is 8383 Wilshire Blvd., Suite 800, Beverly Hills, CA 90211.

On January 11, 2025, I served the following document(s) on the interested parties in this action:  
**PLAINTIFF JOSE DECASTRO'S SUPPLEMENTAL RESPONSES TO DEFENDANT MICHAEL PIERATTINI'S FORM INTERROGATORIES TO PLAINTIFF JOSE DECASTRO, SET ONE**

by placing true copies thereof enclosed in sealed envelopes addressed as follows:

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

*Attorneys for Defendant*  
Michael Pierattini

(BY E-MAIL) Pursuant to CCP § 1010.6, based on the named party's electronic filing in this case being deemed assent to electronic service under the local rules, I sent such document to the individual(s) identified at the email address referenced above.

(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct

Executed on January 22, 2025, at Los Angeles, California.

  
\_\_\_\_\_  
Steven T. Gebelin

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**EXHIBIT 5**

Plaintiff Jose DeCastro’s Supplemental Responses To Defendant Michael Pierattini’s Special Interrogatories, Set One

1 **LESOWITZ GEBELIN LLP**  
Steven T. Gebelin, Esq. (Bar No. 261507)  
2 steven@lawbylg.com  
3 8383 Wilshire Blvd., Suite 800  
Beverly Hills, CA 90211  
4 Telephone: (310) 341-3072  
Facsimile: (310) 341-3070  
5 Attorneys for Plaintiff Jose DeCastro

7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
8 **COUNTY OF LOS ANGELES, SANTA MONICA COURTHOUSE**

9 JOSE DECASTRO,  
10 Plaintiff,  
11  
12 V.  
13 KATHERINE PETER; DANIEL  
CLEMENT; MICHAEL PIERATTINI;  
14 DAVID OMO JR.; and DOES 1 TO 30,  
inclusive,  
15 Defendants.  
16

Case No.: 23SMCV00538  
Assigned for all Purposes to  
*Hon. H. Jay Ford III*, Department O  
**PLAINTIFF JOSE DECASTRO'S  
SUPPLEMENTAL RESPONSES TO  
DEFENDANT MICHAEL PIERATTINI'S  
SPECIAL INTERROGATORIES, SET ONE**  
Case Filed: February 6, 2023  
Trial Date: February 24, 2025

18 PROPOUNDING PARTY: **DEFENDANT MICHAEL PIERATTINI**  
19 RESPONDING PARTY: **PLAINTIFF JOSE DECASTRO**  
20 SET NUMBER: ONE (1)  
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1 Pursuant to California Code of Civil Procedure § 2031.010, *et seq.*, and this Court’s Order  
2 dated May 2, 2024, Plaintiff JOSE DECASTRO (“Plaintiff” or “Responding Party”) hereby  
3 supplements his response to these Demands for SPECIAL INTERROGATORIES, as follows:

4 **SPECIAL INTERROGATORY NO. 1**

5 State all facts that establish that PIERATTINI is allegedly liable for YOUR first cause of  
6 action for “libel, slander, and false light” against PIERATTINI.

7 (“YOU” or “YOUR,” as used in these Special Interrogatories, shall mean Plaintiff Jose  
8 DeCastro, and all persons or entities acting on his behalf or under his direction and control,  
9 including, but not limited to attorneys, agents, employees, accountants, investigators, insurance  
10 companies, their agents, and their employees. “PIERATTINI” as used in these special  
11 interrogatories, shall mean Defendant Michael Pierattini.)

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

13 Plaintiff objects in full on the following grounds: 1) Unduly burdensome due to the long  
14 history of defendant Michael Pierattini (“Pierattini”) harming Plaintiff; 2) Premature contention as  
15 Plaintiff has not concluded discovery to determine all of the facts; 3) Will require a continuing  
16 duty to supplement; 4) Equally (or more) available to Pierattini as he is the one that committed the  
17 acts; 5) Not self-contained, refers to the complaint.

18 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

19 Michael has called me a drug dealer, said I sold the Day, rape drug, called me a fugitive of  
20 the law that I was on the run, said that I stole my roommates identification, stated I was on  
21 probation and didn’t wanna go back to jail. All of these things are demonstratively false.

22  
23  
24 **SPECIAL INTERROGATORY NO. 2:**

25 IDENTIFY all WITNESSES that support YOUR first cause of action for “libel, slander,  
26 and false light” against PIERATTINI.

27 (“WITNESSES,” as used in these Special Interrogatories, shall mean any natural  
28 individual, firm, association, partnership, corporation, public entity, or any other form of legal

1 entity or governmental body unless the context indicates otherwise. "IDENTIFY," as used in  
2 these Special Interrogatories when referring to WITNESSES, shall mean to provide the witness's  
3 name, address, telephone number, email address, employer, and job title.)

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

5 Plaintiff objects in part on the following grounds: 1) Premature contention as Plaintiff has  
6 not concluded discovery to determine all of the witnesses; 2) Equally (or more) available to  
7 Pierattini as he is the one that knows who was there when he committed the acts; 3) Lack of  
8 personal knowledge; 4) Not self-contained, refers to the complaint.

9 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

10 Michael broadcast these things to his audience. He wrote these things down in on the  
11 discord server called Troll mafia.

12 **SPECIAL INTERROGATORY NO. 3:**

13 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR first cause of action  
14 for "libel, slander, and false light" against PIERATTINI. ("DOCUMENTS," as used in these  
15 Special Interrogatories, shall have the same meaning as the term "Writing" as defined in Evidence  
16 Code § 250 and shall include any medium upon which intelligence or information can be  
17 recorded, maintained or retrieved, including without limitation, any handwritten, typed, printed,  
18 electronic, graphic or illustrative material of any kind or description, including drafts and final  
19 versions, however produced or reproduced, whether reduced to hard copy or prepared and/or  
20 maintained in electronic form and regardless of whether approved, signed, sent, received,  
21 redrafted, prepared by or for or in YOUR possession, custody, or control. "DESCRIBE," as used  
22 in these Special Interrogatories when referring to an event, behavior, communication, person, or  
23 thing, shall mean to include the date(s), a detailed description, and the names and contact  
24 information of anyone related to the event, behavior, communication, person, or thing.  
25 "IDENTIFY," as used in these Special Interrogatories when referring to a DOCUMENT, shall  
26 mean to provide a description of the DOCUMENT including the name(s) of the person(s) who  
27 prepared the DOCUMENT, the recipient of the DOCUMENT, the date the DOCUMENT was  
28

1 prepared, the date the DOCUMENT was transmitted, the content of the DOCUMENT and all  
2 persons believed to be in possession of the DOCUMENT.)

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

4 Plaintiff objects in full on the following grounds: 1) Not self-contained, refers to the  
5 complaint; 2) Premature contention as Plaintiff has not concluded discovery to determine all of  
6 the documents; 3) Will require a continuing duty to supplement; 4) Equally (or more) available to  
7 Pierattini as he is the one that caused his acts to be documented. 5) Unduly burdensome due to the  
8 long history of Pierattini harming Plaintiff.

9 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

10 I am submitting screenshots that were taken from the discord account called, troll mafia  
11  
12

13 **SPECIAL INTERROGATORY NO. 4:**

14 State all facts that establish that PIERATTINI is allegedly liable for YOUR second cause  
15 of action for “battery” against PIERATTINI.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

17 Plaintiff objects in full on the following grounds: 1) Unduly burdensome due to the long  
18 history of Pierattini harming Plaintiff; 2) Premature contention as Plaintiff has not concluded  
19 discovery to determine all of the facts; 3) Will require a continuing duty to supplement; 4)  
20 Equally (or more) available to Pierattini as he is the one that committed the acts; 5) Not self-  
21 contained, refers to the complaint.

22 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

23  
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26 **SPECIAL INTERROGATORY NO. 5:**

27 IDENTIFY all WITNESSES that support YOUR second cause of action for “battery”  
28 against PIERATTINI.



1 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

2 Plaintiff objects in part on the following grounds: 1) Premature contention as Plaintiff has  
3 not concluded discovery to determine all of the witnesses; 2) Equally (or more) available to  
4 Pierattini as he is the one that knows who was there when he committed the acts; 3) Lack of  
5 personal knowledge; 4) Not self-contained, refers to the complaint.

6 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

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9 **SPECIAL INTERROGATORY NO. 6:**

10 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR second cause of  
11 action for “battery” against PIERATTINI.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

13 Plaintiff objects in full on the following grounds: 1) Not self-contained, refers to the  
14 complaint; 2) Premature contention as Plaintiff has not concluded discovery to determine all of  
15 the documents; 3) Will require a continuing duty to supplement; 4) Equally (or more) available to  
16 Pierattini as he is the one that caused his acts to be documented. 5) Unduly burdensome due to the  
17 long history of Pierattini harming Plaintiff.

18 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

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22 **SPECIAL INTERROGATORY NO. 7:**

23 State all facts that establish that PIERATTINI is allegedly liable for YOUR third cause of  
24 action for “trespass” against PIERATTINI.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

26 Plaintiff objects in full on the following grounds: 1) Unduly burdensome due to the long  
27 history of Pierattini harming Plaintiff; 2) Premature contention as Plaintiff has not concluded  
28 discovery to determine all of the facts; 3) Will require a continuing duty to supplement; 4)

1 Equally (or more) available to Pierattini as he is the one that committed the acts; 5) Not self-  
2 contained, refers to the complaint.

3 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

4 Michael contributed to DOXXING, my location, in various states, including, but not  
5 limited to, California, Arizona, Texas, Oklahoma, Ohio, New Mexico and Massachusetts as well  
6 as New Hampshire. These facts are well demonstrated in the screenshots from the discord account  
7 called, Troll mafia, Ware Michael has admitted that he has a dues paying member and a self  
8 identified Troll within the Troll mafia.

9  
10  
11 **SPECIAL INTERROGATORY NO. 8:**

12 IDENTIFY all WITNESSES that support YOUR third cause of action for “trespass”  
13 against PIERATTINI.

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

15 Plaintiff objects in part on the following grounds: 1) Premature contention as Plaintiff has  
16 not concluded discovery to determine all of the witnesses; 2) Equally (or more) available to  
17 Pierattini as he is the one that knows who was there when he harmed Plaintiff; 3) Lack of personal  
18 knowledge; 4) Not self-contained, refers to the complaint.

19 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

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23 **SPECIAL INTERROGATORY NO. 9:**

24 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR third cause of action  
25 for “trespass” against PIERATTINI.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

27 Plaintiff objects in full on the following grounds: 1) Not self-contained, refers to the  
28 complaint; 2) Premature contention as Plaintiff has not concluded discovery to determine all of

1 the documents; 3) Will require a continuing duty to supplement; 4) Equally (or more) available to  
2 Pierattini as he is the one that caused his acts to be documented. 5) Unduly burdensome due to the  
3 long history of Pierattini harming Plaintiff.

4 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

5 These documents come from screenshots of the discord account called, troll mafia.  
6 However, because I am not a member of Troll mafia and they would not allow me on the discord  
7 account, they come from people who took screenshots or took pictures of the commentary within  
8 the Troll mafia. Michael Pertini will have to deny under oath that he is a member of the Troll  
9 mafia. He is a member of the Troll mafia, and so he is a part of the conspiracy to instill fear,  
10 harassed, stock, defame, and take my right to publicity.

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13 **SPECIAL INTERROGATORY NO. 10:**

14 State all facts that establish that PIERATTINI is allegedly liable for YOUR fourth cause  
15 of action for “harassment and civil conspiracy” against PIERATTINI.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

17 Plaintiff objects in full on the following grounds: 1) Unduly burdensome due to the long  
18 history of Pierattini harming Plaintiff; 2) Premature contention as Plaintiff has not concluded  
19 discovery to determine all of the facts; 3) Will require a continuing duty to supplement; 4)  
20 Equally (or more) available to Pierattini as he is the one that committed the acts; 5) Not self-  
21 contained, refers to the complaint.

22 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

23 Please see the PDF documentation created from the account on discord called, “troll  
24 mafia” where Mr. Pertini clearly communicates with others that he is actively stalking me and  
25 updating my location.

26  
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28 **SPECIAL INTERROGATORY NO. 11:**

1 IDENTIFY all WITNESSES that support YOUR fourth cause of action for “harassment  
2 and civil conspiracy” against PIERATTINI.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

4 Plaintiff objects in part on the following grounds: 1) Premature contention as Plaintiff has  
5 not concluded discovery to determine all of the witnesses; 2) Equally (or more) available to  
6 Pierattini as he is the one that knows who was there when he harmed Plaintiff; 3) Lack of personal  
7 knowledge; 4) Not self-contained, refers to the complaint.

8 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

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12 **SPECIAL INTERROGATORY NO. 12:**

13 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR fourth cause of action  
14 for “harassment and civil conspiracy” against PIERATTINI.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

16 Plaintiff objects in full on the following grounds: 1) Not self-contained, refers to the  
17 complaint; 2) Premature contention as Plaintiff has not concluded discovery to determine all of  
18 the documents; 3) Will require a continuing duty to supplement; 4) Equally (or more) available to  
19 Pierattini as he is the one that caused his acts to be documented. 5) Unduly burdensome due to the  
20 long history of Pierattini harming Plaintiff.

21 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

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25 **SPECIAL INTERROGATORY NO. 13:**

26 State all facts that establish that PIERATTINI is allegedly liable for YOUR fifth cause of  
27 action for “stalking, cyberstalking, and civil conspiracy” against PIERATTINI.

28 **RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

1 Plaintiff objects in full on the following grounds: 1) Unduly burdensome due to the long  
2 history of Pierattini harming Plaintiff; 2) Premature contention as Plaintiff has not concluded  
3 discovery to determine all of the facts; 3) Will require a continuing duty to supplement; 4)  
4 Equally (or more) available to Pierattini as he is the one that committed the acts; 5) Not self-  
5 contained, refers to the complaint.

6 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

7 Please see the documentation provided from the discord account called, “troll mafia”.  
8 Where Michael has clearly stated that he is a member and an active participant. However, since it  
9 has been revealed that he is a fraud and he is not a private investigator, and he was not in military  
10 police as a narcotics, police officer; they have banished him from the group.

11  
12  
13 **SPECIAL INTERROGATORY NO. 14:**

14 IDENTIFY all WITNESSES that support YOUR fifth cause of action for “stalking,  
15 cyberstalking, and civil conspiracy” against PIERATTINI.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

17 Plaintiff objects in part on the following grounds: 1) Premature contention as Plaintiff has  
18 not concluded discovery to determine all of the witnesses; 2) Equally (or more) available to  
19 Pierattini as he is the one that knows who was there when he harmed Plaintiff; 3) Lack of personal  
20 knowledge; 4) Not self-contained, refers to the complaint.

21 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

22 Please see the PDF where the screenshots are available from the discord account called,  
23 “Troll mafia”  
24

25 **SPECIAL INTERROGATORY NO. 15:**

26 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR fifth cause of action  
27 for “stalking, cyberstalking, and civil conspiracy” against PIERATTINI.

28 **RESPONSE TO SPECIAL INTERROGATORY NO. 15:**

1 Plaintiff objects in full on the following grounds: 1) Not self-contained, refers to the  
2 complaint; 2) Premature contention as Plaintiff has not concluded discovery to determine all of  
3 the documents; 3) Will require a continuing duty to supplement; 4) Equally (or more) available to  
4 Pierattini as he is the one that caused his acts to be documented. 5) Unduly burdensome due to the  
5 long history of Pierattini harming Plaintiff.

6 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 15:**

7 Please see the PDF where the screenshots are available from the discord account called,  
8 “Troll mafia”

9 **SPECIAL INTERROGATORY NO. 16:**

10 State all facts that establish that PIERATTINI is allegedly liable for YOUR sixth cause of  
11 action for “assault” against PIERATTINI.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

13 Plaintiff objects in full on the following grounds: 1) Unduly burdensome due to the long  
14 history of Pierattini harming Plaintiff; 2) Premature contention as Plaintiff has not concluded  
15 discovery to determine all of the facts; 3) Will require a continuing duty to supplement; 4)  
16 Equally (or more) available to Pierattini as he is the one that committed the acts; 5) Not self-  
17 contained, refers to the complaint.

18 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

19 Please see the PDF where the screenshots are available from the discord account called,  
20 “Troll mafia”

21 **SPECIAL INTERROGATORY NO. 17:**

22 IDENTIFY all WITNESSES that support YOUR sixth cause of action for “assault”  
23 against PIERATTINI.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 17:**

25 Plaintiff objects in part on the following grounds: 1) Premature contention as Plaintiff has  
26 not concluded discovery to determine all of the witnesses; 2) Equally (or more) available to  
27 Pierattini as he is the one that knows who was there when he harmed Plaintiff; 3) Lack of personal  
28 knowledge; 4) Not self-contained, refers to the complaint.

1 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 17:**

2 Please see the PDF where the screenshots are available from the discord account called,  
3 “Troll mafia”  
4

5 **SPECIAL INTERROGATORY NO. 18:**

6 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR sixth cause of action  
7 for “assault” against PIERATTINI.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

9 Plaintiff objects in full on the following grounds: 1) Not self-contained, refers to the  
10 complaint; 2) Premature contention as Plaintiff has not concluded discovery to determine all of  
11 the documents; 3) Will require a continuing duty to supplement; 4) Equally (or more) available to  
12 Pierattini as he is the one that caused his acts to be documented. 5) Unduly burdensome due to the  
13 long history of Pierattini harming Plaintiff.

14 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

15 Please see the PDF where the screenshots are available from the discord account called,  
16 “Troll mafia”

17 **SPECIAL INTERROGATORY NO. 19:**

18 State all facts that establish that PIERATTINI is allegedly liable for YOUR seventh cause  
19 of action for “economic interference” against PIERATTINI.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 19:**

21 Plaintiff objects in full on the following grounds: 1) Unduly burdensome due to the long  
22 history of Pierattini harming Plaintiff; 2) Premature contention as Plaintiff has not concluded  
23 discovery to determine all of the facts; 3) Will require a continuing duty to supplement; 4)  
24 Equally (or more) available to Pierattini as he is the one that committed the acts; 5) Not self-  
25 contained, refers to the complaint.

26 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 19:**

27 There are three specific ways this was done. One, calling my phone over and over and  
28 over and over when I’m doing my live stream and interrupting my live stream. I have screenshots

1 that show this and I have videos that show that this is done where people will literally call me and  
2 say blue bacon and then hang up. Too, holding my product up and saying how my product is a  
3 scam and it's a lie, and that the Supreme Court cases are not valid or the circuit cases are not  
4 valid. They absolutely are. Three, calling me a scammer and a grifter, and that I'm selling  
5 products as a way to scam and drift people.

6  
7  
8 **SPECIAL INTERROGATORY NO. 20:**

9 IDENTIFY all WITNESSES that support YOUR seventh cause of action for "economic  
10 interference" against PIERATTINI.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 20:**

12 Plaintiff objects in part on the following grounds: 1) Premature contention as Plaintiff has  
13 not concluded discovery to determine all of the witnesses; 2) Equally (or more) available to  
14 Pierattini as he is the one that knows who was there when he harmed Plaintiff; 3) Lack of personal  
15 knowledge; 4) Not self-contained, refers to the complaint.

16 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 20:**

17 Unfortunately, because Michael is associated with the group called, "Troll mafia", I  
18 cannot list the names of the people here for lack of their physical safety and most certainly their  
19 mental clarity. Troll mafia has no boundaries and will harass any person because of discord and  
20 using Google numbers that are untraceable.

21  
22  
23 **SPECIAL INTERROGATORY NO. 21:**

24 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR seventh cause of  
25 action for "economic interference" against PIERATTINI.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

27 Plaintiff objects in full on the following grounds: 1) Not self-contained, refers to the complaint; 2)  
28 Premature contention as Plaintiff has not concluded discovery to determine all of the documents;



1 3) Will require a continuing duty to supplement; 4) Equally (or more) available to Pierattini as he  
2 is the one that caused his acts to be documented. 5) Unduly burdensome due to the long history of  
3 Pierattini harming Plaintiff.

4 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

5 There are three specific ways this was done. One, calling my phone over and over and  
6 over and over when I'm doing my live stream and interrupting my live stream. I have screenshots  
7 that show this and I have videos that show that this is done where people will literally call me and  
8 say blue bacon and then hang up. Too, holding my product up and saying how my product is a  
9 scam and it's a lie, and that the Supreme Court cases are not valid or the circuit cases are not  
10 valid. They absolutely are. Three, calling me a scammer and a grifter, and that I'm selling  
11 products as a way to scam and drift people.

12  
13  
14 **SPECIAL INTERROGATORY NO. 22:**

15 State all facts that establish that PIERATTINI is allegedly liable for YOUR eighth cause  
16 of action for "right to publicity torts" against PIERATTINI.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

18 Plaintiff objects in full on the following grounds: 1) Unduly burdensome due to the long  
19 history of Pierattini harming Plaintiff; 2) Premature contention as Plaintiff has not concluded  
20 discovery to determine all of the facts; 3) Will require a continuing duty to supplement; 4)  
21 Equally (or more) available to Pierattini as he is the one that committed the acts; 5) Not self-  
22 contained, refers to the complaint.

23 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

24 Please see the PDF called, "Michael Pertini's screenshots from his YouTube channel  
25 called blue bacon"

26  
27  
28 **SPECIAL INTERROGATORY NO. 23:**

1 IDENTIFY all WITNESSES that support YOUR eighth cause of action for “right to  
2 publicity torts” against PIERATTINI.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

4 Plaintiff objects in part on the following grounds: 1) Premature contention as Plaintiff has  
5 not concluded discovery to determine all of the witnesses; 2) Equally (or more) available to  
6 Pierattini as he is the one that knows who was there when he harmed Plaintiff; 3) Lack of personal  
7 knowledge; 4) Not self-contained, refers to the complaint.

8 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

9 Again, I cannot identify witnesses here for fear that they will be stocked, harassed, their  
10 Google ratings will be downgraded for their business

11  
12 **SPECIAL INTERROGATORY NO. 24:**

13 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR eighth cause of action  
14 for “right to publicity torts” against PIERATTINI.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 24:**

16 Plaintiff objects in full on the following grounds: 1) Not self-contained, refers to the  
17 complaint; 2) Premature contention as Plaintiff has not concluded discovery to determine all of  
18 the documents; 3) Will require a continuing duty to supplement; 4) Equally (or more) available to  
19 Pierattini as he is the one that caused his acts to be documented. 5) Unduly burdensome due to the  
20 long history of Pierattini harming Plaintiff.

21 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 24:**

22 Please see the PDF titled, “screenshots from Michael Pertini’s YouTube channel called  
23 blue Bacon.” These are screenshots of the thumbnail that Michael Pitney created to steal my right  
24 of publicity

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27 **SPECIAL INTERROGATORY NO. 25:**

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1 State all facts that support YOUR position in Paragraph 12 of YOUR Complaint that  
2 PIERATTINI is an agent of Defendant Peter.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

4 Plaintiff objects in full on the following grounds: 1) Unduly burdensome due to the long  
5 history of Pierattini harming Plaintiff; 2) Premature contention as Plaintiff has not concluded  
6 discovery to determine all of the facts; 3) Will require a continuing duty to supplement; 4)  
7 Equally (or more) available to Pierattini as he is the one that committed the acts; 5) Not self-  
8 contained, refers to the complaint.

9 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

10 Please see the PDF where the screenshots are available from the discord account called,  
11 “Troll mafia”  
12  
13

14 **SPECIAL INTERROGATORY NO. 26:**

15 IDENTIFY all WITNESSES that support YOUR position in Paragraph 12 of YOUR  
16 Complaint that PIERATTINI is an agent of Defendant Peter.

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 26:**

18 Plaintiff objects in part on the following grounds: 1) Premature contention as Plaintiff has  
19 not concluded discovery to determine all of the witnesses; 2) Equally (or more) available to  
20 Pierattini as he is the one that knows who was there when he harmed Plaintiff; 3) Lack of personal  
21 knowledge; 4) Not self-contained, refers to the complaint.

22 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 26:**  
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26 **SPECIAL INTERROGATORY NO. 27:**

27 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph  
28 12 of YOUR Complaint that PIERATTINI is an agent of Defendant Peter.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 27:**

2 Plaintiff objects in full on the following grounds: 1) Not self-contained, refers to the  
3 complaint; 2) Premature contention as Plaintiff has not concluded discovery to determine all of  
4 the documents; 3) Will require a continuing duty to supplement; 4) Equally (or more) available to  
5 Pierattini as he is the one that caused his acts to be documented. 5) Unduly burdensome due to the  
6 long history of Pierattini harming Plaintiff.

7 **SUPPLEMENTAL RESPONSE TO SPECIAL INTERROGATORY NO. 27:**

8 I am submitting several documents. However, I cannot submit every time Michael Pertini stalked  
9 me, harassed me, interfered with my job, harassed people who invest in me, and in my company,  
10 called my family members, called my friends. Many of my family and friends absolutely refuse to  
11 be a part of any of the legal proceedings because of how much harassment they dealt with from  
12 Michael Pertini working as an agent for Troll mafia official.

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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

*DeCastro v. Peter, et al.*, Los Angeles County Superior Court Case No 23SMCV00538

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action; my business address is 8383 Wilshire Blvd., Suite 800, Beverly Hills, CA 90211.

On January 22, 2025, I served the following document(s) on the interested parties in this action:  
**PLAINTIFF JOSE DECASTRO'S SUPPLEMENTAL RESPONSES TO DEFENDANT MICHAEL PIERATTINI'S SPECIAL INTERROGATORIES TO PLAINTIFF JOSE DECASTRO, SET ONE**

by placing true copies thereof enclosed in sealed envelopes addressed as follows:

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

*Attorneys for Defendant*  
Michael Pierattini

(BY E-MAIL) Pursuant to CCP § 1010.6, based on the named party's electronic filing in this case being deemed assent to electronic service under the local rules, I sent such document to the individual(s) identified at the email address referenced above.

(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct

Executed on January 22, 2025, at Los Angeles, California.

  
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Steven T. Gebelin

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**PROOF OF SERVICE**

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

*DeCastro v. Peter, et al.*, Los Angeles County Superior Court Case No 23SMCV00538

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years and not a party to the within action; my business address is 8383 Wilshire Blvd., Suite 800, Beverly Hills, CA 90211.

On January 22, 2025, I served the following document(s) on the interested parties in this action:  
**DECLARATION OF STEVEN GEBELIN IN SUPPORT OF PLAINTIFF JOSE DECASTRO'S OPPOSITION TO DEFENDANT MICHAEL PIERATTINI'S MOTION FOR SANCTIONS, INCLUDING A REQUEST FOR MONETARY SANCTIONS AGAINST PLAINTIFF IN THE SUM OF \$4,560.00**

by placing true copies thereof enclosed in sealed envelopes addressed as follows:

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  
katrinaklaw@gmail.com  
*Attorneys for Defendant*  
Michael Pierattini

(BY E-MAIL) Pursuant to CCP § 1010.6, based on the named party's electronic filing in this case being deemed assent to electronic service under the local rules, I sent such document to the individual(s) identified at the email address referenced above.

(STATE) I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct

Executed on January 22, 2025, at Los Angeles, California.

  
Steven T. Gebelin