

1 R. Paul Katrinak, State Bar No. 164057
LAW OFFICES OF R. PAUL KATRINAK
2 9663 Santa Monica Blvd., 458
Beverly Hills, California 90210
3 Telephone: (310) 990-4348
Facsimile: (310) 921-5398

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David W. Slayton,
Executive Officer/Clerk of Court,
By S. Gardner, Deputy Clerk

4 Attorneys for Defendant
Michael Pierattini

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6
7 IN THE SUPERIOR COURT OF THE STATE OF CALIFORNIA
8 IN AND FOR THE COUNTY OF LOS ANGELES

9
10 JOSE DECASTRO,

11 Plaintiff,

12 v.

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

15 Defendants.

) Case No. 23SMCV00538

)
) Assigned for all purposes to the Honorable
) H. Jay Ford, Dept. O

)
) **SEPARATE STATEMENT IN SUPPORT**
) **OF DEFENDANT MICHAEL**
) **PIERATTINI'S MOTION FOR**
) **TERMINATING SANCTIONS**
) **CONCERNING DEFENDANT MICHAEL**
) **PIERATTINI'S FORM**
) **INTERROGATORIES TO PLAINTIFF**
) **JOSE DECASTRO, SET ONE**

16
17 Date: February 21, 2025
18 Time: 8:30 A.M.
19 Dept: O

1 Defendant, Michail Pierattini, hereby submits this Separate Statement in support of its
2 Motion for Terminating Sanctions concerning Form Interrogatories, Set One.

3 **I. SUMMARY OF THE DISCOVERY AT ISSUE**

4 These are simple, basic form interrogatories. The idea behind these form interrogatories
5 is to allow Plaintiff to be ready for trial and narrow the issues. They are essential for trial
6 preparation. Plaintiff only responded to Form Interrogatories 2.1, 2.8, and 2.9 four out of the
7 46 total Form Interrogatories served in December 2023, over a year ago. This evidences a
8 complete contempt of the Court's Order and California law. Enough is enough. Terminating
9 Sanctions are plainly appropriate

10 **II. DEFENDANT'S COURT ORDERED ANSWERS TO FORM**
11 **INTERROGATORIES ARE GROSSLY DEFICIENT UNDER CALIFORNIA**
12 **LAW**

13 **FORM INTERROGATORY NO. 2.1:**

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

16 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 2.1:**

17 Jose DeCastro. Chille.

18 **FORM INTERROGATORY 2.2**

19 State the date and place of your birth.

20 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 2.2:**

21 California

22 **WHY THIS RESPONSE TO INTERROGATORY NO. 2.2 IS IN VIOLATION OF THE**
23 **COURT'S ORDER**

24 Each answer in an interrogatory response must be "as *complete* and *straightforward* as
25 the information reasonably available to the responding party permits." CCP §§ 2030.220(a)
26 and (b). Finally, in answering interrogatories, a party must furnish information available from
27 sources under the party's control. "[A party] cannot plead ignorance to information which can
28 be obtained from sources under his control." *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
(1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

1 There is no justification not to respond to this basic interrogatory that was ordered by
2 the Court. Plaintiff did not provide his date of birth. This interrogatory is a Judicial Form
3 Interrogatory and should be responded to. Defendant needs this information to conduct an
4 investigation of Plaintiff. It is outrageous that Plaintiff simply ignored the Court’s Order.
5 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

6 **FORM INTERROGATORY 2.3**

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

11 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 2.3:**

12 n/a

13 **WHY THIS RESPONSE TO INTERROGATORY NO. 2.3 IS IN VIOLATION OF THE**
14 **COURT’S ORDER**

15 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
16 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
17 and (b). Finally, in answering interrogatories, a party must furnish information available from
18 sources under the party's control. “[A party] cannot plead ignorance to information which can
19 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
20 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

21 There is no justification not to respond to this basic interrogatory that was ordered by
22 the Court. Plaintiff’s driver’s license information was ordered by the Court. This interrogatory
23 is a Judicial Form Interrogatory and should be responded to. Defendant needs this information
24 to conduct an investigation of Plaintiff. It is outrageous that Plaintiff simply ignored the
25 Court’s Order. Terminating Sanctions should be issued and Plaintiff’s Complaint should be
26 dismissed.

27 ///

28 ///

1 **FORM INTERROGATORY NO. 2.4**

2 At the time of the **INCIDENT**, did you have any other
3 permit or license for the operation of a motor vehicle? If so,
4 state:

- 5 (a) the state or other issuing entity;
- 6 (b) the license number and type;
- 7 (c) the date of issuance; and
- 8 (d) all restrictions.

9 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 2.4:**

10 n/a

11 **WHY THIS RESPONSE TO INTERROGATORY NO. 2.4 IS IN VOIATION OF THE**
12 **COURT’S ORDER**

13 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
14 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
15 and (b). Finally, in answering interrogatories, a party must furnish information available from
16 sources under the party's control. “[A party] cannot plead ignorance to information which can
17 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
(1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

18 There is no justification not to respond to this basic interrogatory that was ordered by
19 the Court. N/A is not an answer. This interrogatory is a Judicial Form Interrogatory and
20 should be responded to. Defendant needs this information to conduct an investigation of
21 Plaintiff. It is outrageous that Plaintiff simply ignored the Court’s Order. Terminating
22 Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

23 **FORM INTERROGATORY NO. 2.5**

24 State:

- 25 (a) your present residence **ADDRESS**;
- 26 (b) your residence **ADDRESSES** for the past five years;
27 and
- 28 (c) the dates you lived at each **ADDRESS**.

29 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 2.5:**

1258 Franklin, Santa Monica, CA 90404

1 **WHY THIS RESPONSE TO INTERROGATORY NO. 2.5 IS IN VIOLATION OF THE**
2 **COURT’S ORDER**

3 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
4 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
5 and (b). Finally, in answering interrogatories, a party must furnish information available from
6 sources under the party's control. “[A party] cannot plead ignorance to information which can
7 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
8 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

9 There is no justification not to respond to this basic interrogatory that was ordered by
10 the Court and provide the information requested. Plaintiff professes to live in Nevada and
11 provided a Nevada address when ordered by the Court. Plaintiff plainly does not live at this
12 address and Plaintiff failed to provide his address information. This interrogatory is a Judicial
13 Form Interrogatory and should be responded to. Defendant needs this information to conduct
14 an investigation of Plaintiff. It is outrageous that Plaintiff simply ignored the Court’s Order.
15 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

16 **FORM INTERROGATORY NO. 2.6**

17 State:

- 18 (a) the name, **ADDRESS**, and telephone number of your
19 present employer or place of self-employment; and
20 (b) the name, **ADDRESS**, dates of employment, job title,
21 and nature of work for each employer or self-
22 employment you have had from five years before the
23 **INCIDENT** until today.

24 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 2.6:**

25 No. It’s irrelevant. “The Incident” is why Michael Pierattini got himself sued.

26 **WHY THIS RESPONSE TO INTERROGATORY NO. 2.6 IS IN VIOLATION OF THE**
27 **COURT’S ORDER**

28 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
and (b). Finally, in answering interrogatories, a party must furnish information available from
sources under the party's control. “[A party] cannot plead ignorance to information which can

1 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
2 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

3 There is no justification not to respond to this basic interrogatory that was ordered by
4 the Court. The Court ordered a response. Plaintiff provided no information and claims this
5 interrogatory is “irrelevant.” This interrogatory is a Judicial Form Interrogatory and should be
6 responded to. Defendant needs this information to conduct an investigation of Plaintiff. It is
7 outrageous that Plaintiff simply ignored the Court’s Order. Terminating Sanctions should be
8 issued and Plaintiff’s Complaint should be dismissed.

9 **FORM INTERROGATORY NO. 2.7**

10 State:

- 11 (a) the name and **ADDRESS** of each school or other
12 academic or vocational institution you have attended,
beginning with high school;
13 (b) the dates you attended;
14 (c) the highest grade level you have completed; and
(d) the degrees received.

15 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 2.7:**

16 No.

17 **WHY THIS RESPONSE TO INTERROGATORY NO. 2.7 IS IN VIOLATION OF THE**
18 **COURT’S ORDER**

19 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
20 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
21 and (b). Finally, in answering interrogatories, a party must furnish information available from
22 sources under the party's control. “[A party] cannot plead ignorance to information which can
23 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
(1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

24 There is no justification not to respond to this basic interrogatory that was ordered by
25 the Court. No is not an answer to this interrogatory. This interrogatory is a Judicial Form
26 Interrogatory and should be responded to. Defendant needs this information to conduct an
27 investigation of Plaintiff. It is outrageous that Plaintiff simply ignored the Court’s Order.
28 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

1 **FORM INTERROGATORY NO. 2.8:**

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

5 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 2.8:**

6 No, I have not.

7 **FORM INTERROGATORY NO. 2.9:**

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

10 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 2.9:**

11 Yup, English.

12 **FORM INTERROGATORY NO. 2.10:**

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

15 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 2.10:**

16 English is a good language.

17 **FORM INTERROGATORY NO. 2.11**

18 At the time of the **INCIDENT** were you acting as an
19 agent or employee for any **PERSON**? If so, state:

- 20 (a) the name, **ADDRESS**, and telephone number of that
21 **PERSON**; and
22 (b) a description of your duties.

23 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 2.11:**

24 n/a

25 **WHY THIS RESPONSE TO INTERROGATORY NO. 2.11 IS IN VIOLATION OF**
26 **THE COURT'S ORDER**

27 Each answer in an interrogatory response must be "as *complete* and *straightforward* as
28 the information reasonably available to the responding party permits." CCP §§ 2030.220(a)
and (b). Finally, in answering interrogatories, a party must furnish information available from
sources under the party's control. "[A party] cannot plead ignorance to information which can

1 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
2 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

3 There is no justification not to respond to this basic interrogatory that was ordered by
4 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
5 should be responded to. Defendant needs this information to conduct an investigation of
6 Plaintiff. It is outrageous that Plaintiff simply ignored the Court’s Order. Terminating
7 Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

8 **FORM INTERROGATORY NO. 2.12**

9 At the time of the **INCIDENT** did you or any other person have any physical,
10 emotional, or mental disability or condition that may have contributed to the occurrence of the
11 **INCIDENT?** If so, for each person state:

- 12 (a) the name, **ADDRESS**, and telephone number;
- 13 (b) the nature of the disability or condition; and
- 14 (c) the manner in which the disability or condition
contributed to the occurrence of the **INCIDENT**.

15 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 2.12:**

16 No. I won’t put my friends and family “out” on a public document.

17 **WHY THIS RESPONSE TO INTERROGATORY NO. 2.12 IS IN VIOLATION OF**
18 **THE COURT’S ORDER**

19 As stated in the Motion, each answer in an interrogatory response must be “as *complete*
20 and *straightforward* as the information reasonably available to the responding party permits.”
21 CCP §§ 2030.220(a) and (b). Finally, in answering interrogatories, a party must furnish
22 information available from sources under the party's control. “[A party] cannot plead ignorance
23 to information which can be obtained from sources under his control.” *Deyo v. Kilbourne*, 84
24 Cal. App. 3d 771, 783 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal.
25 App. 4th 1496, 1504. Defendants’ answers are not straightforward but are convoluted and
26 combined and do not provide the information requested in the Interrogatory.

27 There is no justification not to respond to this basic interrogatory that was ordered by
28 the Court. There is a Protective Order in place. This interrogatory is a Judicial Form
Interrogatory and should be responded to. Defendant needs this information to conduct an

1 investigation of Plaintiff. It is outrageous that Plaintiff simply ignored the Court's Order.
2 Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

3 **FORM INTERROGATORY NO. 4.1:**

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

- 8 (a) the kind of coverage;
9 (b) the name and ADDRESS of the insurance company;
10 (c) the name, ADDRESS, and telephone number of each named insured;
11 (d) the policy number;
12 (e) the limits of coverage for each type of coverage contained in the policy;
13 (f) whether any reservation of rights or controversy or coverage dispute exists between
14 you and the insurance company; and
15 (g) the name, ADDRESS, and telephone number of the custodian of the policy.

16 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 4.1:**

17 n/a

18 **WHY THIS RESPONSE TO INTERROGATORY NO. 4.1 IS IN VIOLATION OF THE**
19 **COURT'S ORDER**

20 Each answer in an interrogatory response must be "as *complete* and *straightforward* as
21 the information reasonably available to the responding party permits." CCP §§ 2030.220(a)
22 and (b). Finally, in answering interrogatories, a party must furnish information available from
23 sources under the party's control. "[A party] cannot plead ignorance to information which can
24 be obtained from sources under his control." *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
25 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

26 There is no justification not to respond to this basic interrogatory that was ordered by
27 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
28 should be responded to. It is outrageous that Plaintiff simply ignored the Court's Order.

Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

1 **FORM INTERROGATORY NO. 4.2:**

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

4 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 4.2:**

5 n/a

6 **WHY THIS RESPONSE TO INTERROGATORY NO. 4.2 IS IN VIOLATION OF THE**
7 **COURT’S ORDER**

8 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
9 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
10 and (b). Finally, in answering interrogatories, a party must furnish information available from
11 sources under the party's control. “[A party] cannot plead ignorance to information which can
12 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
13 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

14 There is no justification not to respond to this basic interrogatory that was ordered by
15 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
16 should be responded to. It is outrageous that Plaintiff simply ignored the Court’s Order.
17 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

18 **FORM INTERROGATORY NO. 6.1:**

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

21 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 6.1**

22 n/a

23 **WHY THIS RESPONSE TO INTERROGATORY NO. 6.1 IS IN VIOLATION OF THE**
24 **COURT’S ORDER**

25 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
26 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
27 and (b). Finally, in answering interrogatories, a party must furnish information available from
28 sources under the party's control. “[A party] cannot plead ignorance to information which can

1 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
2 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

3 There is no justification not to respond to this basic interrogatory that was ordered by
4 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
5 should be responded to. It is outrageous that Plaintiff simply ignored the Court’s Order.
6 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

7 **FORM INTERROGATORY NO. 6.2:**

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

9 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 6.2:**

10 n/a

11 **WHY THIS RESPONSE TO INTERROGATORY NO. 6.2 IS IN VIOLATION OF THE**
12 **COURT’S ORDER**

13 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
14 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
15 and (b). Finally, in answering interrogatories, a party must furnish information available from
16 sources under the party's control. “[A party] cannot plead ignorance to information which can
17 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
18 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

19 There is no justification not to respond to this basic interrogatory that was ordered by
20 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
21 should be responded to. It is outrageous that Plaintiff simply ignored the Court’s Order.
22 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

23 **FORM INTERROGATORY NO. 6.3:**

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

27 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 6.3:**

28 n/a

1 **WHY THIS RESPONSE TO INTERROGATORY NO. 6.3 IS IN VIOLATION OF THE**
2 **COURT’S ORDER**

3 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
4 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
5 and (b). Finally, in answering interrogatories, a party must furnish information available from
6 sources under the party's control. “[A party] cannot plead ignorance to information which can
7 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
8 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

9 There is no justification not to respond to this basic interrogatory that was ordered by
10 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
11 should be responded to. It is outrageous that Plaintiff simply ignored the Court’s Order.
12 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

13 **FORM INTERROGATORY NO. 6.4:**

14 Did you receive any consultation or examination (except from expert witnesses covered
15 by Code of Civil Procedure sections 2034.210–2034.310) or treatment from a **HEALTH**
16 **CARE PROVIDER** for any injury you attribute to the **INCIDENT**? If so, for each **HEALTH**
17 **CARE PROVIDER** state: (a) the name, **ADDRESS**, and telephone number; (b) the type of
18 consultation, examination, or treatment provided; (c) the dates you received consultation,
19 examination, or treatment; and (d) the charges to date.

20 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 6.4:**

21 n/a

22 **WHY THIS RESPONSE TO INTERROGATORY NO. 6.4 IS IN VIOLATION OF THE**
23 **COURT’S ORDER**

24 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
25 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
26 and (b). Finally, in answering interrogatories, a party must furnish information available from
27 sources under the party's control. “[A party] cannot plead ignorance to information which can
28 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
(1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

1 There is no justification not to respond to this basic interrogatory that was ordered by
2 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
3 should be responded to. It is outrageous that Plaintiff simply ignored the Court’s Order.
4 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

5 **FORM INTERROGATORY NO. 6.5:**

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

10 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 6.5:**

11 Hippa

12 **WHY THIS RESPONSE TO INTERROGATORY NO. 6.5 IS IN VIOLATION OF THE**
13 **COURT’S ORDER**

14 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
15 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
16 and (b). Finally, in answering interrogatories, a party must furnish information available from
17 sources under the party's control. “[A party] cannot plead ignorance to information which can
18 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
19 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

20 There is no justification not to respond to this basic interrogatory that was ordered by
21 the Court. HIPPA is not a response. This interrogatory is a Judicial Form Interrogatory and
22 should be responded to. Defendant needs this information to conduct an investigation of
23 Plaintiff. It is outrageous that Plaintiff simply ignored the Court’s Order. Terminating
24 Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

25 **FORM INTERROGATORY NO. 6.6:**

26 Are there any other medical services necessitated by the injuries that you attribute to
27 the **INCIDENT** that were not previously listed (for example, ambulance, nursing, prosthetics)?
28 If so, for each service state: (a) the nature; (b) the date; (c) the cost; and (d) the name,

ADDRESS, and telephone number of each provider.

1 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 6.6:**

2 n/a

3 **WHY THIS RESPONSE TO INTERROGATORY NO. 6.6 IS IN VIOLATION OF THE**
4 **COURT’S ORDER**

5 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
6 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
7 and (b). Finally, in answering interrogatories, a party must furnish information available from
8 sources under the party's control. “[A party] cannot plead ignorance to information which can
9 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
10 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

11 There is no justification not to respond to this basic interrogatory that was ordered by
12 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
13 should be responded to. It is outrageous that Plaintiff simply ignored the Court’s Order.
14 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

15 **FORM INTERROGATORY NO. 6.7:**

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

21 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 6.7:**

22 n/a

23 **WHY THIS RESPONSE TO INTERROGATORY NO. 6.7 IS IN VIOLATION OF THE**
24 **COURT’S ORDER**

25 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
26 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
27 and (b). Finally, in answering interrogatories, a party must furnish information available from
28 sources under the party's control. “[A party] cannot plead ignorance to information which can

1 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
2 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

3 There is no justification not to respond to this basic interrogatory that was ordered by
4 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
5 should be responded to. It is outrageous that Plaintiff simply ignored the Court’s Order.
6 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

7 **FORM INTERROGATORY NO. 7.1:**

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

14 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 7.1:**

15 n/a

16 **WHY THIS RESPONSE TO INTERROGATORY NO. 7.1 IS IN VIOLATION OF THE**
17 **COURT’S ORDER**

18 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
19 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
20 and (b). Finally, in answering interrogatories, a party must furnish information available from
21 sources under the party's control. “[A party] cannot plead ignorance to information which can
22 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
23 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

24 There is no justification not to respond to this basic interrogatory that was ordered by
25 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
26 should be responded to. It is outrageous that Plaintiff simply ignored the Court’s Order.
27 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

28 ///

1 **FORM INTERROGATORY NO. 7.2:**

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

7 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 7.2:**

8 n/a

9 **WHY THIS RESPONSE TO INTERROGATORY NO. 7.2 IS IN VIOLATION OF THE**
10 **COURT’S ORDER**

11 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
12 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
13 and (b). Finally, in answering interrogatories, a party must furnish information available from
14 sources under the party's control. “[A party] cannot plead ignorance to information which can
15 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
16 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

17 There is no justification not to respond to this basic interrogatory that was ordered by
18 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
19 should be responded to. It is outrageous that Plaintiff simply ignored the Court’s Order.
20 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

21 **FORM INTERROGATORY NO. 9.1:**

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

25 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 9.1:**

26 *No, I won’t put other’s information out for “The Troll Mafia”*

27 ///

28 ///

1 **WHY THIS RESPONSE TO INTERROGATORY NO. 9.1 IS IN VIOLATION OF THE**
2 **COURT'S ORDER**

3 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
4 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
5 and (b). Finally, in answering interrogatories, a party must furnish information available from
6 sources under the party's control. “[A party] cannot plead ignorance to information which can
7 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
8 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

9 There is no justification not to respond to this basic interrogatory that was ordered by
10 the Court. This is a nonsense response and provides no information. This interrogatory is a
11 Judicial Form Interrogatory and should be responded to. It is outrageous that Plaintiff simply
12 ignored the Court’s Order. Terminating Sanctions should be issued and Plaintiff’s Complaint
13 should be dismissed.

14 **FORM INTERROGATORY NO. 9.2:**

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

18 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 9.2:**

19 *n/a*

20 **WHY THIS RESPONSE TO INTERROGATORY NO. 9.2 IS IN VIOLATION OF THE**
21 **COURT'S ORDER**

22 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
23 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
24 and (b). Finally, in answering interrogatories, a party must furnish information available from
25 sources under the party's control. “[A party] cannot plead ignorance to information which can
26 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
27 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

28 There is no justification not to respond to this basic interrogatory that was ordered by
the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and

1 should be responded to. It is outrageous that Plaintiff simply ignored the Court’s Order.
2 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

3 **FORM INTERROGATORY NO. 11.1:**

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

12 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 11.1:**

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

14 **WHY THIS RESPONSE TO INTERROGATORY NO. 11.1 IS IN VIOLATION OF**
15 **THE COURT’S ORDER**

16 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
17 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
18 and (b). Finally, in answering interrogatories, a party must furnish information available from
19 sources under the party's control. “[A party] cannot plead ignorance to information which can
20 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
21 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

22 There is no justification not to respond to this basic interrogatory that was ordered by
23 the Court. Whether Plaintiff received compensation is irrelevant. The question is whether
24 Plaintiff filed any other actions. This is a non-response. This interrogatory is a Judicial Form
25 Interrogatory and should be responded to. Defendant needs this information to conduct an
26 investigation of Plaintiff. It is outrageous that Plaintiff simply ignored the Court’s Order.
27 Terminating Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

28 ///

1 **FORM INTERROGATORY NO. 11.2:**

2 In the past 10 years have you made a written claim or demand for workers'
3 compensation benefits? If so, for each claim or demand state: (a) the date, time, and place of
4 the **INCIDENT** giving rise to the claim; (b) the name, **ADDRESS**, and telephone number of
5 your employer at the time of the injury; (c) the name, **ADDRESS**, and telephone number of the
6 workers' compensation insurer and the claim number; (d) the period of time during which you
7 received workers' compensation benefits; (e) a description of the injury; (f) the name,
8 **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who provided
9 services; and (g) the case number at the Workers' Compensation Appeals Board.

10 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 11.2:**

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

13 **WHY THIS RESPONSE TO INTERROGATORY NO. 11.2 IS IN VIOLATION OF**
14 **THE COURT'S ORDER**

15 Each answer in an interrogatory response must be "as *complete* and *straightforward* as
16 the information reasonably available to the responding party permits." CCP §§ 2030.220(a)
17 and (b). Finally, in answering interrogatories, a party must furnish information available from
18 sources under the party's control. "[A party] cannot plead ignorance to information which can
19 be obtained from sources under his control." *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
20 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

21 There is no justification not to respond to this basic interrogatory that was ordered by
22 the Court. This is a non-response and evidences contempt of the Court's order. This
23 interrogatory is a Judicial Form Interrogatory and should be responded to. Defendant needs
24 this information to conduct an investigation of Plaintiff. It is outrageous that Plaintiff simply
25 ignored the Court's Order. Terminating Sanctions should be issued and Plaintiff's Complaint
26 should be dismissed.

27 ///

28 ///

1 **FORM INTERROGATORY NO. 12.1**

2 State the name, **ADDRESS**, and telephone number of each individual:

- 3 (a) who witnessed the **INCIDENT** or the events occurring
4 immediately before or after the **INCIDENT**;
5 (b) who made any statement at the scene of the **INCIDENT**;
6 (c) who heard any statements made about the **INCIDENT**
7 by any individual at the scene; and
8 (d) who **YOU OR ANYONE ACTING ON YOUR BEHALF**
claim has knowledge of the **INCIDENT** (except for
expert witnesses covered by Code of Civil Procedure
section 2034).

9 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 12.1:**

10 *Four People have submitted statements.*

11 **WHY THIS RESPONSE TO INTERROGATORY NO. 12.1 IS IN VIOLATION OF**
12 **THE COURT'S ORDER**

13 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
14 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
15 and (b). Finally, in answering interrogatories, a party must furnish information available from
16 sources under the party's control. “[A party] cannot plead ignorance to information which can
17 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
18 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

19 There is no justification not to respond to this basic interrogatory that was ordered by
20 the Court. This is a non-response and does not identify the witnesses. This interrogatory is a
21 Judicial Form Interrogatory and should be responded to. Defendant needs this information to
22 conduct an investigation of Plaintiff. It is outrageous that Plaintiff simply ignored the Court's
23 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

24 **FORM INTERROGATORY NO. 12.2**

25 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** interviewed any
26 individual concerning the **INCIDENT**? If so, for each individual state:

- 27 (a) the name, **ADDRESS**, and telephone number of the
individual interviewed;
28 (b) the date of the interview; and
(c) the name, **ADDRESS**, and telephone number of the
PERSON who conducted the interview.

1 **WHY THIS RESPONSE TO INTERROGATORY NO. 12.3 IS IN VIOLATION OF**
2 **THE COURT'S ORDER**

3 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
4 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
5 and (b). Finally, in answering interrogatories, a party must furnish information available from
6 sources under the party's control. “[A party] cannot plead ignorance to information which can
7 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
8 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

9 There is no justification not to respond to this basic interrogatory that was ordered by
10 the Court. This is an absurd “response.” This interrogatory is a Judicial Form Interrogatory
11 and should be responded to. Defendant needs this information to conduct an investigation of
12 Plaintiff. It is outrageous that Plaintiff simply ignored the Court’s Order. Terminating
13 Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

14 **FORM INTERROGATORY NO. 12.4**

15 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any photographs,
16 films, or videotapes depicting any place, object, or individual concerning the **INCIDENT** or
17 plaintiff's injuries? If so, state:

- 18 (a) the number of photographs or feet of film or videotape;
- 19 (b) the places, objects, or persons photographed, filmed, or
20 videotaped;
- 21 (c) the date the photographs, films, or videotapes were
22 taken;
- 23 (d) the name, **ADDRESS**, and telephone number of the
24 individual taking the photographs, films, or videotapes;
25 and
- 26 (e) the name, **ADDRESS**, and telephone number of each
27 **PERSON** who has the original or a copy of the
28 photographs, films, or videotapes.

29 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 12.4:**

30 *There are plenty of videos and evidence from discord.*

31 ///

32 ///

1 **WHY THIS RESPONSE TO INTERROGATORY NO. 12.4 IS IN VIOLATION OF**
2 **THE COURT'S ORDER**

3 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
4 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
5 and (b). Finally, in answering interrogatories, a party must furnish information available from
6 sources under the party's control. “[A party] cannot plead ignorance to information which can
7 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
8 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

9 There is no justification not to respond to this basic interrogatory that was ordered by
10 the Court. This is a nothing response. This interrogatory is a Judicial Form Interrogatory and
11 should be responded to. Defendant needs this information to conduct an investigation of
12 Plaintiff. It is outrageous that Plaintiff simply ignored the Court's Order. Terminating
13 Sanctions should be issued and Plaintiff's Complaint should be dismissed.

14 **FORM INTERROGATORY NO. 12.5**

15 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any diagram,
16 reproduction, or model of any place or thing (except for items developed by expert witnesses
17 covered by Code of Civil Procedure sections 2034.210–2034.310) concerning
18 the **INCIDENT**? If so, for each item state:

- 19 (a) the type (i.e., diagram, reproduction, or model);
20 (b) the subject matter; and
21 (c) the name, **ADDRESS**, and telephone number of each
PERSON who has it.

22 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 12.5:**

23 *n/a*

24 **WHY THIS RESPONSE TO INTERROGATORY NO. 12.5 IS IN VIOLATION OF**
25 **THE COURT'S ORDER**

26 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
27 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
28 and (b). Finally, in answering interrogatories, a party must furnish information available from
sources under the party's control. “[A party] cannot plead ignorance to information which can

1 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
2 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

3 There is no justification not to respond to this basic interrogatory that was ordered by
4 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
5 should be responded to. Defendant needs this information to conduct an investigation of
6 Plaintiff. It is outrageous that Plaintiff simply ignored the Court’s Order. Terminating
7 Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

8 **FORM INTERROGATORY NO. 12.6**

9 Was a report made by any **PERSON** concerning the **INCIDENT**? If so, state:

- 10 (a) the name, title, identification number, and employer of
11 the **PERSON** who made the report;
12 (b) the date and type of report made;
13 (c) the name, **ADDRESS**, and telephone number of the
14 **PERSON** for whom the report was made; and
15 (d) the name, **ADDRESS**, and telephone number of each
16 **PERSON** who has the original or a copy of the report.

17 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 12.6:**

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

19 **WHY THIS RESPONSE TO INTERROGATORY NO. 12.6 IS IN VIOLATION OF**
20 **THE COURT’S ORDER**

21 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
22 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
23 and (b). Finally, in answering interrogatories, a party must furnish information available from
24 sources under the party's control. “[A party] cannot plead ignorance to information which can
25 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
26 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

27 There is no justification not to respond to this basic interrogatory that was ordered by
28 the Court. This is not a response. Plaintiff thinks that Court Orders and discovery are a joke.
This interrogatory is a Judicial Form Interrogatory and should be responded to. Defendant
needs this information to conduct an investigation of Plaintiff. It is outrageous that Plaintiff

1 simply ignored the Court's Order. Terminating Sanctions should be issued and Plaintiff's
2 Complaint should be dismissed.

3 **FORM INTERROGATORY NO. 12.7**

4 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** inspected the scene of
5 the **INCIDENT**? If so, for each inspection state:

- 6 (a) the name, **ADDRESS**, and telephone number of the
7 individual making the inspection (except for expert
8 witnesses covered by Code of Civil Procedure
sections 2034.210–2034.310); and
9 (b) the date of the inspection.

9 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 12.7:**

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

11 **WHY THIS RESPONSE TO INTERROGATORY NO. 12.7 IS IN VIOLATION OF**
12 **THE COURT'S ORDER**

13 Each answer in an interrogatory response must be "as *complete* and *straightforward* as
14 the information reasonably available to the responding party permits." CCP §§ 2030.220(a)
15 and (b). Finally, in answering interrogatories, a party must furnish information available from
16 sources under the party's control. "[A party] cannot plead ignorance to information which can
17 be obtained from sources under his control." *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
18 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

19 There is no justification not to respond to this basic interrogatory that was ordered by
20 the Court. It's Plaintiff's Complaint. Only Plaintiff knows. This interrogatory is a Judicial
21 Form Interrogatory and should be responded to. Defendant needs this information to conduct
22 an investigation of Plaintiff. It is outrageous that Plaintiff simply ignored the Court's Order.
23 Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

24 **FORM INTERROGATORY NO. 13.1**

25 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** conducted surveillance of
26 any individual involved in the **INCIDENT** or any party to this action? If so, for each sur-
27 veillance state:

- 28 (a) the name, **ADDRESS**, and telephone number of the
individual or party;
(b) the time, date, and place of the surveillance;
(c) the name, **ADDRESS**, and telephone number of the

1 individual who conducted the surveillance; and
2 (d) the name, **ADDRESS**, and telephone number of each
3 **PERSON** who has the original or a copy of any
4 surveillance photograph, film, or videotape.

5 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 13.1:**

6 *n/a*

7 **WHY THIS RESPONSE TO INTERROGATORY NO. 13.1 IS IN VIOLATION OF**
8 **THE COURT'S ORDER**

9 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
10 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
11 and (b). Finally, in answering interrogatories, a party must furnish information available from
12 sources under the party's control. “[A party] cannot plead ignorance to information which can
13 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
(1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

14 There is no justification not to respond to this basic interrogatory that was ordered by
15 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
16 should be responded to. Defendant needs this information to conduct an investigation of
17 Plaintiff. It is outrageous that Plaintiff simply ignored the Court’s Order. Terminating
18 Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

19 **FORM INTERROGATORY NO. 13.2**

20 Has a written report been prepared on them surveillance? If so, for each written report
21 state:

- 22 (a) the title;
23 (b) the date;
24 (c) the name, **ADDRESS**, and telephone number of the
25 individual who prepared the report; and
26 (d) the name, **ADDRESS**, and telephone number of each
27 **PERSON** who has the original or a copy.

28 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 13.2:**

n/a

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1 **WHY THIS RESPONSE TO INTERROGATORY NO. 13.2 IS IN VIOLATION OF**
2 **THE COURT'S ORDER**

3 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
4 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
5 and (b). Finally, in answering interrogatories, a party must furnish information available from
6 sources under the party's control. “[A party] cannot plead ignorance to information which can
7 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
8 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

9 There is no justification not to respond to this basic interrogatory that was ordered by
10 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
11 should be responded to. Defendant needs this information to conduct an investigation of
12 Plaintiff. It is outrageous that Plaintiff simply ignored the Court’s Order. Terminating
13 Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

14 **FORM INTERROGATORY NO. 14.1**

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

20 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 14.1:**

21 *n/a*

22 **WHY THIS RESPONSE TO INTERROGATORY NO. 14.1 IS IN VIOLATION OF**
23 **THE COURT'S ORDER**

24 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
25 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
26 and (b). Finally, in answering interrogatories, a party must furnish information available from
27 sources under the party's control. “[A party] cannot plead ignorance to information which can
28 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
(1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

1 There is no justification not to respond to this basic interrogatory that was ordered by
2 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
3 should be responded to. Defendant needs this information to conduct an investigation of
4 Plaintiff. It is outrageous that Plaintiff simply ignored the Court’s Order. Terminating
5 Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

6 **FORM INTERROGATORY NO. 14.2**

7 Was any **PERSON** cited or charged with a violation of any statute, ordinance, or
8 regulation as a result of this **INCIDENT**? If so, for each **PERSON** state:

- 9 (a) the name, **ADDRESS**, and telephone number of the
10 **PERSON**;
11 (b) the statute, ordinance, or regulation allegedly violated;
12 (c) whether the **PERSON** entered a plea in response to the
13 citation or charge and, if so, the plea entered; and
14 (d) the name and **ADDRESS** of the court or administrative
15 agency, names of the parties, and case number.

16 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 14.2:**

17 *n/a*

18 **WHY THIS RESPONSE TO INTERROGATORY NO. 14.2 IS IN VIOLATION OF**
19 **THE COURT’S ORDER**

20 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
21 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
22 and (b). Finally, in answering interrogatories, a party must furnish information available from
23 sources under the party's control. “[A party] cannot plead ignorance to information which can
24 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
25 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

26 There is no justification not to respond to this basic interrogatory that was ordered by
27 the Court. N/A is not a response. This interrogatory is a Judicial Form Interrogatory and
28 should be responded to. Defendant needs this information to conduct an investigation of
Plaintiff. It is outrageous that Plaintiff simply ignored the Court’s Order. Terminating
Sanctions should be issued and Plaintiff’s Complaint should be dismissed.

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1 **FORM INTERROGATORY NO. 17.1**

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

- 4 (a) state the number of the request;
5 (b) state all facts on which you base your response;
6 (c) state the names, **ADDRESSES**, and telephone numbers
7 of all **PERSONS** who have knowledge of those facts;
8 and
9 (d) identify all **DOCUMENTS** and other tangible things that
10 support your response and state the name, **ADDRESS**,
11 and telephone number of the **PERSON** who has each
12 **DOCUMENT** or thing.

13 **COURT ORDERED RESPONSE TO FORM INTERROGATORY NO. 17.1:**

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

20 **WHY THIS RESPONSE TO INTERROGATORY NO. 17.1 IS IN VIOLATION OF**
21 **THE COURT’S ORDER**

22 Each answer in an interrogatory response must be “as *complete* and *straightforward* as
23 the information reasonably available to the responding party permits.” CCP §§ 2030.220(a)
24 and (b). Finally, in answering interrogatories, a party must furnish information available from
25 sources under the party's control. “[A party] cannot plead ignorance to information which can
26 be obtained from sources under his control.” *Deyo v. Kilbourne*, 84 Cal. App. 3d 771, 783
27 (1978); *Regency Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 Cal. App. 4th 1496, 1504.

28 There is no justification not to respond to this basic interrogatory that was ordered by
the Court. This is not a response. His statement “I’m the one suing Michael Pertini, I’m not
being sued” speaks volumes. Plaintiff will never respond to discovery. This interrogatory is a
Judicial Form Interrogatory and should be responded to. Defendant needs this information to

1 conduct an investigation of Plaintiff. It is outrageous that Plaintiff simply ignored the Court's
2 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

3
4 DATED: January 31, 2025

LAW OFFICES OF R. PAUL KATRINAK



By: _____
R. Paul Katrinak
Attorneys for Defendant
Michael Pierattini

LAW OFFICES OF R. PAUL KATRINAK
9963 Santa Monica Blvd., 458
Beverly Hills, California 90210
Telephone: (310) 990-4348
Facsimile: (310) 921-5398

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PROOF OF SERVICE

STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

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

On January 31, 2025, I served the foregoing document(s) described as:

SEPARATE STATEMENT IN SUPPORT OF DEFENDANT MICHAEL PIERATTINI'S MOTION FOR TERMINATING SANCTIONS CONCERNING DEFENDANT MICHAEL PIERATTINI'S FORM INTERROGATORIES TO PLAINTIFF JOSE DECASTRO, SET ONE

on the interested parties to this action addressed as follows:

Steven T. Gebelin, Esq.
LESOWITZ GEBELIN LLP
8383 Wilshire Blvd., Suite 800
Beverly Hills, CA 90211
steven@lawbylg.com

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

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

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

Executed January 31, 2025, at Los Angeles, California.

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



R. Paul Katrinak