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

5 Attorneys for Defendant  
Michael Pierattini  
6

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

9 JOSE DECASTRO, )  
10 )  
Plaintiff, )  
11 )  
v. )  
12 )  
KATHERINE PETER; DANIEL CLEMENT; )  
13 )  
MICHAEL PIERATTINI; DAVID OMO JR.; )  
14 )  
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 REQUESTS FOR  
PRODUCTION OF DOCUMENTS TO  
PLAINTIFF JOSE DECASTRO, SET ONE**

Date: February 21, 2024  
Time: 8:30 a.m.  
Dept: O

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

1 Defendant Michael Pierattini (“Mr. Pierattini”) hereby submits this Separate Statement in  
2 support of his Motion for Terminating Sanctions concerning to Defendant Michael Pierattini’s  
3 Requests for Production of Documents to Plaintiff Jose DeCastro, Set One, as follows:

4 **THE DOCUMENT REQUESTS AT ISSUE IN THIS MOTION**

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 and  
14 Plaintiff will not proceed without an agreement of costs. 5) It is irrelevant and beyond the scope of  
15 discovery (Defendant Michael Pierattini (“Pierattini”) has no claims related to Plaintiff’s speech).

16 **COURT ORDERD RESPONSE TO DOCUMENT REQUEST NO.1:**

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

18 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT’S ORDER:**

19 This response fails to comply with CCP § 2031.220 which states:

20 A statement that the party to whom a demand for inspection, copying, testing, or  
21 sampling has been directed will comply with the particular demand shall state that  
22 the production, inspection, copying, testing, or sampling, and related activity  
23 demanded, will be allowed either in whole or in part, and that all documents or things  
in the demanded category that are in the possession, custody, or control of that party  
and to which no objection is being made will be included in the production.

24 There is no such indication in the response that the production is partial or complete as required. HE  
25 did not produce a single document. This Request was served December 2023.

26 It is outrageous that Plaintiff has not properly responded to the Request for Production of  
27 Documents in violation of the Court's Order and in the face of a Motion for Terminating  
28 Sanctions. It is over a year since these Document Requests were served and over eight months since

1 the May 2, 2024 Court Order. Plaintiff has had a lawyer since July and plainly the ability to  
2 properly respond. Plaintiff is simply flouting the Court's Order. Terminating Sanctions should be  
3 issued and Plaintiff's Complaint should be dismissed.

4 **DOCUMENT REQUEST NO. 2:**

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

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

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

17 **COURT ORDERED RESPONSE TO DOCUMENT REQUEST NO.2**

18 Michael Pertini has called me a drug dealer, claimed that I stole from my roommate, claimed  
19 that I was on probation, and I feared being put back in jail when that wasn't true. He has  
20 claimed that I sold the Date rape drug called GHB. This is defamation per se because that's not  
21 true. In his own videos, he has claimed that I am a drug dealer and he has called me a felon. I am  
22 not a felon.

23 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT'S ORDER:**

24 This response fails to comply with CCP § 2031.220 which states:

25 A statement that the party to whom a demand for inspection, copying, testing, or  
26 sampling has been directed will comply with the particular demand shall state that  
27 the production, inspection, copying, testing, or sampling, and related activity  
28 demanded, will be allowed either in whole or in part, and that all documents or things  
in the demanded category that are in the possession, custody, or control of that party  
and to which no objection is being made will be included in the production.

1 There is no such indication in the response that the production is partial or complete as required. HE  
2 did not produce a single document. This Request was served December 2023.

3 This is not a Request for Production of Documents Response. It is outrageous that Plaintiff  
4 has not properly responded to the Request for Production of Documents in violation of the Court's  
5 Order and in the face of a Motion for Terminating Sanctions. It is over a year since these Document  
6 Requests were served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a  
7 lawyer since July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
8 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

9 **DOCUMENT REQUEST NO. 4:**

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

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

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 **COURT ORDERED RESPONSE TO DOCUMENT REQUEST NO.4**

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

27 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT'S ORDER:**

28 This response fails to comply with CCP § 2031.220 which states:

1 A statement that the party to whom a demand for inspection, copying, testing, or  
2 sampling has been directed will comply with the particular demand shall state that  
3 the production, inspection, copying, testing, or sampling, and related activity  
4 demanded, will be allowed either in whole or in part, and that all documents or things  
5 in the demanded category that are in the possession, custody, or control of that party  
6 and to which no objection is being made will be included in the production.

7 There is no such indication in the response that the production is partial or complete as required. HE  
8 did not produce a single document. This Request was served December 2023.

9 This is a non-response in violation of the Court's Order. It is outrageous that Plaintiff has not  
10 properly responded to the Request for Production of Documents in violation of the Court's Order  
11 and in the face of a Motion for Terminating Sanctions. It is over a year since these Document  
12 Requests were served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a  
13 lawyer since July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
14 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

15 **DOCUMENT REQUEST NO. 5:**

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

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

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

**COURT ORDERED RESPONSE TO DOCUMENT REQUEST NO. 5:**

These things have been well documented in the screenshots. He is an active member and a

1 participating, paying member, of the Troll mafia. He has stalked me across the country, pinning  
2 my exact locations in the discord account for, Troll mafia. His associations are with Troll ma he  
3 has and continues to actively participate with this group that labels themselves, Troll mafia. It is  
4 all in the screenshots of the discord account, Troll mafia. It is in his own videos. It is in the  
5 thumbnails that he creates for his YouTube page. See, Michael doesn't get anybody to watch his  
6 channel unless he is attacking another person. Unless he is defaming, disparaging, degrading  
7 another human being. If Michael tries to create a video that just regards his interest, nobody  
8 watches his videos.

9 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT'S ORDER:**

10 This response fails to comply with CCP § 2031.220 which states:

11 A statement that the party to whom a demand for inspection, copying, testing, or  
12 sampling has been directed will comply with the particular demand shall state that  
13 the production, inspection, copying, testing, or sampling, and related activity  
14 demanded, will be allowed either in whole or in part, and that all documents or things  
in the demanded category that are in the possession, custody, or control of that party  
and to which no objection is being made will be included in the production.

15 There is no such indication in the response that the production is partial or complete as required. HE  
16 did not produce a single document. This Request was served December 2023.

17 This is a non-response in violation of the Court's Order. It is outrageous that Plaintiff has not  
18 properly responded to the Request for Production of Documents in violation of the Court's Order  
19 and in the face of a Motion for Terminating Sanctions. It is over a year since these Document  
20 Requests were served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a  
21 lawyer since July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
22 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

23 ///

24 ///

25 ///

26 **DOCUMENT REQUEST NO. 6:**

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

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

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 **COURT ORDERED RESPONSE TO DOCUMENT REQUEST NO. 6:**

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

17 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT'S ORDER:**

18 This response fails to comply with CCP § 2031.220 which states:

19 A statement that the party to whom a demand for inspection, copying, testing, or  
20 sampling has been directed will comply with the particular demand shall state that  
21 the production, inspection, copying, testing, or sampling, and related activity  
22 demanded, will be allowed either in whole or in part, and that all documents or things  
in the demanded category that are in the possession, custody, or control of that party  
and to which no objection is being made will be included in the production.

23 There is no such indication in the response that the production is partial or complete as required. HE  
24 did not produce a single document. This Request was served December 2023.

25 This is a non-response in violation of the Court's Order. It is outrageous that Plaintiff has not  
26 properly responded to the Request for Production of Documents in violation of the Court's Order  
27 and in the face of a Motion for Terminating Sanctions. It is over a year since these Document  
28 Requests were served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a

1 lawyer since July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
2 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

3 **DOCUMENT REQUEST NO. 7:**

4 Any and all DOCUMENTS that support YOUR second cause of action for “battery” against  
5 PIERATTINI.

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

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

17 **COURT ORDERED RESPONSE TO DOCUMENT REQUEST NO. 7:**

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

20 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT’S ORDER:**

21 This response fails to comply with CCP § 2031.220 which states:

22 A statement that the party to whom a demand for inspection, copying, testing, or  
23 sampling has been directed will comply with the particular demand shall state that  
24 the production, inspection, copying, testing, or sampling, and related activity  
25 demanded, will be allowed either in whole or in part, and that all documents or things  
in the demanded category that are in the possession, custody, or control of that party  
and to which no objection is being made will be included in the production.

26 There is no such indication in the response that the production is partial or complete as required. HE  
27 did not produce a single document. This Request was served December 2023.

28



1 It is outrageous that Plaintiff has not properly responded to the Request for Production of  
2 Documents in violation of the Court's Order and in the face of a Motion for Terminating  
3 Sanctions. It is over a year since these Document Requests were served and over eight months since  
4 the May 2, 2024 Court Order. Plaintiff has had a lawyer since July and plainly the ability to  
5 properly respond. Plaintiff is simply flouting the Court's Order. Terminating Sanctions should be  
6 issued and Plaintiff's Complaint should be dismissed.

7 **DOCUMENT REQUEST NO. 8:**

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

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

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 **COURT ORDERED RESPONSE TO DOCUMENT REQUEST NO. 8:**

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

28 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT'S ORDER:**

1 This response fails to comply with CCP § 2031.220 which states:

2 A statement that the party to whom a demand for inspection, copying, testing, or  
3 sampling has been directed will comply with the particular demand shall state that  
4 the production, inspection, copying, testing, or sampling, and related activity  
5 demanded, will be allowed either in whole or in part, and that all documents or things  
6 in the demanded category that are in the possession, custody, or control of that party  
7 and to which no objection is being made will be included in the production.

8 There is no such indication in the response that the production is partial or complete as required. HE  
9 did not produce a single document. This Request was served December 2023.

10 This is a non-response in violation of the Court's Order. It is outrageous that Plaintiff has not  
11 properly responded to the Request for Production of Documents in violation of the Court's Order  
12 and in the face of a Motion for Terminating Sanctions. It is over a year since these Document  
13 Requests were served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a  
14 lawyer since July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
15 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

16 **DOCUMENT REQUEST NO. 9:**

17 Any and all DOCUMENTS that support YOUR fourth cause of action for "harassment and  
18 civil conspiracy" against PIERATTINI.

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

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

30 **COURT ORDERED RESPONSE TO DOCUMENT REQUEST NO. 9:**

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

8 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT'S ORDER:**

9 This response fails to comply with CCP § 2031.220 which states:

10 A statement that the party to whom a demand for inspection, copying, testing, or  
11 sampling has been directed will comply with the particular demand shall state that  
12 the production, inspection, copying, testing, or sampling, and related activity  
13 demanded, will be allowed either in whole or in part, and that all documents or things  
14 in the demanded category that are in the possession, custody, or control of that party  
15 and to which no objection is being made will be included in the production.

16 There is no such indication in the response that the production is partial or complete as required. HE  
17 did not produce a single document. This Request was served December 2023.

18 This is a non-response in violation of the Court's Order. It is outrageous that Plaintiff has not  
19 properly responded to the Request for Production of Documents in violation of the Court's Order  
20 and in the face of a Motion for Terminating Sanctions. It is over a year since these Document  
21 Requests were served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a  
22 lawyer since July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
23 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

24 ///

25 **DOCUMENT REQUEST NO. 10:**

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

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

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

1 frame or the events relating to the subject matter of the litigation. 2) After a diligent search and  
2 reasonable inquiry, the responsive documents cannot be produced as they have never existed, have  
3 been destroyed, have been lost, misplaced, or stolen. Responding party believes that Pierattini has  
4 possession, custody, or control of the responsive documents. 3) It calls for the disclosure of  
5 information protected from discovery by the attorney-client privilege. 4) It is so vague and  
6 ambiguous that Plaintiff cannot in good faith determine the scope of the request. 5) It seeks  
7 proprietary information that is a trade secret. 6) It seeks ESI that is not reasonably accessible to the  
8 Plaintiff and Plaintiff will not proceed without an agreement of costs.

9 **COURT ORDERED RESPONSE TO DOCUMENT REQUEST NO. 10:**

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

13 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT'S ORDER:**

14 This response fails to comply with CCP § 2031.220 which states:

15 A statement that the party to whom a demand for inspection, copying, testing, or  
16 sampling has been directed will comply with the particular demand shall state that  
17 the production, inspection, copying, testing, or sampling, and related activity  
18 demanded, will be allowed either in whole or in part, and that all documents or things  
in the demanded category that are in the possession, custody, or control of that party  
and to which no objection is being made will be included in the production.

19 There is no such indication in the response that the production is partial or complete as required. HE  
20 did not produce a single document. This Request was served December 2023.

21 This is a non-response in violation of the Court's Order. It is outrageous that Plaintiff has not  
22 properly responded to the Request for Production of Documents in violation of the Court's Order  
23 and in the face of a Motion for Terminating Sanctions. It is over a year since these Document  
24 Requests were served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a  
25 lawyer since July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
26 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

27 **DOCUMENT REQUEST NO. 11:**

28

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

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

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 **COURT ORDERED RESPONSE TO DOCUMENT REQUEST NO. 11:**

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

17 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT’S ORDER:**

18 This response fails to comply with CCP § 2031.220 which states:

19 A statement that the party to whom a demand for inspection, copying, testing, or  
20 sampling has been directed will comply with the particular demand shall state that  
21 the production, inspection, copying, testing, or sampling, and related activity  
22 demanded, will be allowed either in whole or in part, and that all documents or things  
in the demanded category that are in the possession, custody, or control of that party  
and to which no objection is being made will be included in the production.

23 There is no such indication in the response that the production is partial or complete as required. HE  
24 did not produce a single document. This Request was served December 2023.

25 It is outrageous that Plaintiff has not properly responded to the Request for Production of  
26 Documents in violation of the Court's Order and in the face of a Motion for Terminating  
27 Sanctions. It is over a year since these Document Requests were served and over eight months since  
28 the May 2, 2024 Court Order. Plaintiff has had a lawyer since July and plainly the ability to

1 properly respond. Plaintiff is simply flouting the Court's Order. Terminating Sanctions should be  
2 issued and Plaintiff's Complaint should be dismissed.

3 **DOCUMENT REQUEST NO. 12:**

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

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

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

17 **COURT ORDERED RESPONSE TO DOCUMENT REQUEST NO. 12:**

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

22 ///

23 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT’S ORDER:**

24 This response fails to comply with CCP § 2031.220 which states:

25 A statement that the party to whom a demand for inspection, copying, testing, or  
26 sampling has been directed will comply with the particular demand shall state that  
27 the production, inspection, copying, testing, or sampling, and related activity  
28 demanded, will be allowed either in whole or in part, and that all documents or things  
in the demanded category that are in the possession, custody, or control of that party  
and to which no objection is being made will be included in the production.

1 There is no such indication in the response that the production is partial or complete as required. HE  
2 did not produce a single document. This Request was served December 2023.

3 This is a non-response in violation of the Court’s Order. It is outrageous that Plaintiff has not  
4 properly responded to the Request for Production of Documents in violation of the Court's Order  
5 and in the face of a Motion for Terminating Sanctions. It is over a year since these Document  
6 Requests were served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a  
7 lawyer since July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
8 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

9 **DOCUMENT REQUEST NO. 13:**

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

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

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 **COURT ORDERED RESPONSE TO DOCUMENT REQUEST NO. 13:**

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

28 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT’S ORDER:**

1 This response fails to comply with CCP § 2031.220 which states:

2 A statement that the party to whom a demand for inspection, copying, testing, or  
3 sampling has been directed will comply with the particular demand shall state that  
4 the production, inspection, copying, testing, or sampling, and related activity  
5 demanded, will be allowed either in whole or in part, and that all documents or things  
6 in the demanded category that are in the possession, custody, or control of that party  
7 and to which no objection is being made will be included in the production.

8 There is no such indication in the response that the production is partial or complete as required. HE  
9 did not produce a single document. This Request was served December 2023.

10 This is a non-response in violation of the Court's Order. It is outrageous that Plaintiff has not  
11 properly responded to the Request for Production of Documents in violation of the Court's Order  
12 and in the face of a Motion for Terminating Sanctions. It is over a year since these Document  
13 Requests were served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a  
14 lawyer since July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
15 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

16 **DOCUMENT REQUEST NO. 18:**

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

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

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

**COURT ORDERED RESPONSE TO DOCUMENT REQUEST NO. 18:**

Plaintiff produces herewith all emails received from Pierattini.



1 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT'S ORDER:**

2 This response fails to comply with CCP § 2031.220 which states:

3 A statement that the party to whom a demand for inspection, copying, testing, or  
4 sampling has been directed will comply with the particular demand shall state that  
5 the production, inspection, copying, testing, or sampling, and related activity  
6 demanded, will be allowed either in whole or in part, and that all documents or things  
in the demanded category that are in the possession, custody, or control of that party  
and to which no objection is being made will be included in the production.

7 There is no such indication in the response that the production is partial or complete as required. HE  
8 did not produce a single document. This Request was served December 2023.

9 It is outrageous that Plaintiff has not properly responded to the Request for Production of  
10 Documents in violation of the Court's Order and in the face of a Motion for Terminating  
11 Sanctions. It is over a year since these Document Requests were served and over eight months since  
12 the May 2, 2024 Court Order. Plaintiff has had a lawyer since July and plainly the ability to  
13 properly respond. Plaintiff is simply flouting the Court's Order. Terminating Sanctions should be  
14 issued and Plaintiff's Complaint should be dismissed.

15 **DOCUMENT REQUEST NO. 19:**

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

18 ///

19 ///

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

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 **COURT ORDERED RESPONSE TO DOCUMENT REQUEST NO. 19:**

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

6 **REASON WHY THIS RESPONSE IS IN VIOLATION OF THIS COURT'S ORDER:**

7 This response fails to comply with CCP § 2031.220 which states:

8 A statement that the party to whom a demand for inspection, copying, testing, or  
9 sampling has been directed will comply with the particular demand shall state that  
10 the production, inspection, copying, testing, or sampling, and related activity  
11 demanded, will be allowed either in whole or in part, and that all documents or things  
12 in the demanded category that are in the possession, custody, or control of that party  
13 and to which no objection is being made will be included in the production.

14 There is no such indication in the response that the production is partial or complete as required. HE  
15 did not produce a single document. This Request was served December 2023.

16 It is outrageous that Plaintiff has not properly responded to the Request for Production of  
17 Documents in violation of the Court's Order and in the face of a Motion for Terminating  
18 Sanctions. It is over a year since these Document Requests were served and over eight months since  
19 the May 2, 2024 Court Order. Plaintiff has had a lawyer since July and plainly the ability to  
20 properly respond. Plaintiff is simply flouting the Court's Order. Terminating Sanctions should be  
21 issued and Plaintiff's Complaint should be dismissed.

22 DATED: January 31, 2025

23 THE LAW OFFICES OF  
24 R. PAUL KATRINAK



25 R. Paul Katrinak  
26 Attorneys for Defendant  
27 Michael Pierattini  
28

1 **PROOF OF SERVICE**

2  
3 STATE OF CALIFORNIA  
4 COUNTY OF LOS ANGELES

5 I am employed in the County of Los Angeles, State of California; I am over the age of 18  
6 and not a party to the within action; my business address is 9663 Santa Monica Boulevard, Suite  
7 458, Beverly Hills, California 90210.

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

9 **SEPARATE STATEMENT IN SUPPORT OF DEFENDANT MICHAEL  
10 PIERATTINI'S MOTION FOR TERMINATING SANCTIONS CONCERNING  
11 DEFENDANT MICHAEL PIERATTINI'S REQUESTS FOR PRODUCTION OF  
12 DOCUMENTS TO PLAINTIFF JOSE DECASTRO, SET ONE**

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

14 Steven T. Gebelin, Esq.  
15 LESOWITZ GEBELIN LLP  
16 8383 Wilshire Blvd., Suite 800  
17 Beverly Hills, CA 90211  
18 steven@lawbylg.com

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

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

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

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

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

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R. Paul Katrinak