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

4 Attorneys for Defendant  
Michael Pierattini

5  
6 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
7 FOR THE COUNTY OF LOS ANGELES  
8

9 JOSE DECASTRO,

10 Plaintiff,

11 v.

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

14 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 SPECIAL**  
) **INTERROGATORIES TO PLAINTIFF**  
) **JOSE DECASTRO, SET ONE**

15  
16 Date: February 21, 2025  
17 Time: 8:30 a.m.  
18 Dept: O  
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1 Defendant Michael Pierattini (“Mr. Pierattini”) hereby submits this Separate Statement in  
2 support of his Motion for Terminating Sanctions concerning Defendant Michael Pierattini’s Special  
3 Interrogatories to Plaintiff Jose DeCastro, Set One, as follows:

4 **THE SPECIAL INTERROGATORIES AT ISSUE IN THIS MOTION**

5 **SPECIAL INTERROGATORY NO. 3:**

6 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR first cause of action for  
7 “libel, slander, and false light” against PIERATTINI.

8 (*“DOCUMENTS,” as used in these Special Interrogatories, shall have the same meaning as*  
9 *the term "Writing" as defined in Evidence Code § 250 and shall include any medium upon which*  
10 *intelligence or information can be recorded, maintained or retrieved, including without limitation,*  
11 *any handwritten, typed, printed, electronic, graphic or illustrative material of any kind or*  
12 *description, including drafts and final versions, however produced or reproduced, whether reduced*  
13 *to hard copy or prepared and/or maintained in electronic form and regardless of whether approved,*  
14 *signed, sent, received, redrafted, prepared by or for or in YOUR possession, custody, or control.*

15 *“DESCRIBE,” as used in these Special Interrogatories when referring to an event, behavior,*  
16 *communication, person, or thing, shall mean to include the date(s), a detailed description, and the*  
17 *names and contact information of anyone related to the event, behavior, communication, person, or*  
18 *thing. “IDENTIFY,” as used in these Special Interrogatories when referring to a DOCUMENT,*  
19 *shall mean to provide a description of the DOCUMENT including the name(s) of the person(s) who*  
20 *prepared the DOCUMENT, the recipient of the DOCUMENT, the date the DOCUMENT was*  
21 *prepared, the date the DOCUMENT was transmitted, the content of the DOCUMENT and all*  
22 *persons believed to be in possession of the DOCUMENT.)*

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

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

1 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

2 I am submitting screenshots that were taken from the discord account called, troll mafia

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

4 This response fails to comply with CCP § 2030.220 which states:

5 a) Each answer in a response to interrogatories shall be as complete and straightforward  
6 as the information reasonably available to the responding party permits.

7 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
8 possible.

9 (c) If the responding party does not have personal knowledge sufficient to respond  
10 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
11 faith effort to obtain the information by inquiry to other natural persons or  
12 organizations, except where the information is equally available to the propounding  
13 party.

14 Plaintiff has not provided a responsive answer in compliance with the Court’s Order. It is  
15 outrageous that Plaintiff has not properly responded to this Special Interrogatory in violation of the  
16 Court's Order and in the face of a Motion for Terminating Sanctions. It is over a year since these  
17 Special Interrogatories were served and over eight months since the May 2, 2024 Court  
18 Order. Plaintiff has had a lawyer since July and plainly the ability to properly respond. Plaintiff is  
19 simply flouting the Court's Order. Terminating Sanctions should be issued and Plaintiff's Complaint  
20 should be dismissed.

21 **SPECIAL INTERROGATORY NO. 4:**

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

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

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

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1 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

2 [No response provided.]

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

4 This response fails to comply with CCP § 2030.220 which states:

5 a) Each answer in a response to interrogatories shall be as complete and straightforward  
6 as the information reasonably available to the responding party permits.

7 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
8 possible.

9 (c) If the responding party does not have personal knowledge sufficient to respond  
10 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
11 faith effort to obtain the information by inquiry to other natural persons or  
12 organizations, except where the information is equally available to the propounding  
13 party.

14 Plaintiff has not provided a response at all. It is outrageous that Plaintiff has not properly  
15 responded to this Special Interrogatory in violation of the Court's Order and in the face of a Motion  
16 for Terminating Sanctions. It is over a year since these Special Interrogatories were served and over  
17 eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since July and plainly  
18 the ability to properly respond. Plaintiff is simply flouting the Court's Order. Terminating  
19 Sanctions should be issued and Plaintiff's Complaint should be dismissed.

20 **SPECIAL INTERROGATORY NO. 5:**

21 IDENTIFY all WITNESSES that support YOUR second cause of action for "battery"  
22 against PIERATTINI.

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

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

28 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

[No response provided.]

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

This response fails to comply with CCP § 2030.220 which states:

- a) Each answer in a response to interrogatories shall be as complete and straightforward as the information reasonably available to the responding party permits.
- (b) If an interrogatory cannot be answered completely, it shall be answered to the extent possible.
- (c) If the responding party does not have personal knowledge sufficient to respond fully to an interrogatory, that party shall so state, but shall make a reasonable and good faith effort to obtain the information by inquiry to other natural persons or organizations, except where the information is equally available to the propounding party.

Plaintiff has not provided a response at all. It is outrageous that Plaintiff has not properly responded to this Special Interrogatory in violation of the Court's Order and in the face of a Motion for Terminating Sanctions. It is over a year since these Special Interrogatories were served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

**SPECIAL INTERROGATORY NO. 6:**

DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR second cause of action for "battery" against PIERATTINI.

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

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

**COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

[No response provided.]

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

This response fails to comply with CCP § 2030.220 which states:

- a) Each answer in a response to interrogatories shall be as complete and straightforward as the information reasonably available to the responding party permits.
- (b) If an interrogatory cannot be answered completely, it shall be answered to the extent possible.
- (c) If the responding party does not have personal knowledge sufficient to respond fully to an interrogatory, that party shall so state, but shall make a reasonable and good faith effort to obtain the information by inquiry to other natural persons or

1 organizations, except where the information is equally available to the propounding  
2 party.

3 Plaintiff has not provided a response at all. It is outrageous that Plaintiff has not properly  
4 responded to this Special Interrogatory in violation of the Court's Order and in the face of a Motion  
5 for Terminating Sanctions. It is over a year since these Special Interrogatories were served and over  
6 eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since July and plainly  
7 the ability to properly respond. Plaintiff is simply flouting the Court's Order. Terminating  
8 Sanctions should be issued and Plaintiff's Complaint should be dismissed.

8 **SPECIAL INTERROGATORY NO. 7:**

9 State all facts that establish that PIERATTINI is allegedly liable for YOUR third cause of  
10 action for "trespass" against PIERATTINI.

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

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

17 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

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

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

24 This response fails to comply with CCP § 2030.220 which states:

- 25 a) Each answer in a response to interrogatories shall be as complete and straightforward  
26 as the information reasonably available to the responding party permits.  
27 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
28 possible.  
(c) If the responding party does not have personal knowledge sufficient to respond  
fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
faith effort to obtain the information by inquiry to other natural persons or

1 organizations, except where the information is equally available to the propounding  
2 party.

3 Plaintiff has not provided a responsive answer, and there is no indication in the response that  
4 Plaintiff has made a reasonable and good faith effort to obtain the information requested. This is a  
5 non-answer.

6 It is outrageous that Plaintiff has not properly responded to this Special Interrogatory in  
7 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. It is over a  
8 year since these Special Interrogatories were served and over eight months since the May 2, 2024  
9 Court Order. Plaintiff has had a lawyer since July and plainly the ability to properly  
10 respond. Plaintiff is simply flouting the Court's Order. Terminating Sanctions should be issued and  
11 Plaintiff's Complaint should be dismissed.

12 **SPECIAL INTERROGATORY NO. 8:**

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

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

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

20 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 8:**

21 [No response provided.]

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

23 This response fails to comply with CCP § 2030.220 which states:

- 24 a) Each answer in a response to interrogatories shall be as complete and straightforward  
25 as the information reasonably available to the responding party permits.  
26 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
27 possible.  
28 (c) If the responding party does not have personal knowledge sufficient to respond  
fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
faith effort to obtain the information by inquiry to other natural persons or  
organizations, except where the information is equally available to the propounding  
party.

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

7 **SPECIAL INTERROGATORY NO. 9:**

8 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR third cause of action for  
9 "trespass" against PIERATTINI.

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

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

15 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 9:**

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

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

23 This response fails to comply with CCP § 2030.220 which states:

- 24 a) Each answer in a response to interrogatories shall be as complete and straightforward  
25 as the information reasonably available to the responding party permits.  
26 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
27 possible.  
28 (c) If the responding party does not have personal knowledge sufficient to respond  
fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
faith effort to obtain the information by inquiry to other natural persons or  
organizations, except where the information is equally available to the propounding  
party.



1 Plaintiff has not provided a responsive answer, and there is no indication in the response that  
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested. It is  
3 outrageous that Plaintiff has not properly responded to this Special Interrogatory in violation of the  
4 Court's Order and in the face of a Motion for Terminating Sanctions. It is over a year since these  
5 Special Interrogatories were served and over eight months since the May 2, 2024 Court  
6 Order. Plaintiff has had a lawyer since July and plainly the ability to properly respond. Plaintiff is  
7 simply flouting the Court's Order. Terminating Sanctions should be issued and Plaintiff's Complaint  
8 should be dismissed.

9 **SPECIAL INTERROGATORY NO. 10:**

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

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

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

18 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 10:**

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

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

23 This response fails to comply with CCP § 2030.220 which states:

- 24 a) Each answer in a response to interrogatories shall be as complete and straightforward  
25 as the information reasonably available to the responding party permits.  
26 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
27 possible.  
28 (c) If the responding party does not have personal knowledge sufficient to respond  
fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
faith effort to obtain the information by inquiry to other natural persons or  
organizations, except where the information is equally available to the propounding  
party.

1 Plaintiff has not provided a responsive answer. This “answer” is non-responsive. It is  
2 outrageous that Plaintiff has not properly responded to this Special Interrogatory in violation of the  
3 Court's Order and in the face of a Motion for Terminating Sanctions. It is over a year since these  
4 Special Interrogatories were served and over eight months since the May 2, 2024 Court  
5 Order. Plaintiff has had a lawyer since July and plainly the ability to properly respond. Plaintiff is  
6 simply flouting the Court's Order. Terminating Sanctions should be issued and Plaintiff's Complaint  
7 should be dismissed.

8 **SPECIAL INTERROGATORY NO. 11:**

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

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

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

16 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 11:**

17 [No response provided.]

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

19 This response fails to comply with CCP § 2030.220 which states:

- 20 a) Each answer in a response to interrogatories shall be as complete and straightforward  
21 as the information reasonably available to the responding party permits.  
22 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
23 possible.  
24 (c) If the responding party does not have personal knowledge sufficient to respond  
25 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
26 faith effort to obtain the information by inquiry to other natural persons or  
27 organizations, except where the information is equally available to the propounding  
28 party.

29 Plaintiff has not provided a response at all. It is outrageous that Plaintiff has not properly  
30 responded to this Special Interrogatory in violation of the Court's Order and in the face of a Motion  
31 for Terminating Sanctions. It is over a year since these Special Interrogatories were served and over  
32 eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since July and plainly

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

3 **SPECIAL INTERROGATORY NO. 12:**

4 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR fourth cause of action  
5 for "harassment and civil conspiracy" against PIERATTINI.

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

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

12 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 12:**

13 [No response provided.]

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

15 This response fails to comply with CCP § 2030.220 which states:

- 16 a) Each answer in a response to interrogatories shall be as complete and straightforward  
17 as the information reasonably available to the responding party permits.  
18 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
19 possible.  
20 (c) If the responding party does not have personal knowledge sufficient to respond  
21 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
22 faith effort to obtain the information by inquiry to other natural persons or  
23 organizations, except where the information is equally available to the propounding  
24 party.

21 Plaintiff has not provided a response at all. It is outrageous that Plaintiff has not properly  
22 responded to this Special Interrogatory in violation of the Court's Order and in the face of a Motion  
23 for Terminating Sanctions. It is over a year since these Special Interrogatories were served and over  
24 eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since July and plainly  
25 the ability to properly respond. Plaintiff is simply flouting the Court's Order. Terminating  
26 Sanctions should be issued and Plaintiff's Complaint should be dismissed.

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1 **SPECIAL INTERROGATORY NO. 13:**

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

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

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

10 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 13:**

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

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

16 This response fails to comply with CCP § 2030.220 which states:

- 17 a) Each answer in a response to interrogatories shall be as complete and straightforward  
18 as the information reasonably available to the responding party permits.  
19 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
20 possible.  
21 (c) If the responding party does not have personal knowledge sufficient to respond  
22 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
23 faith effort to obtain the information by inquiry to other natural persons or  
24 organizations, except where the information is equally available to the propounding  
25 party.

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

1 **SPECIAL INTERROGATORY NO. 14:**

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

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

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

9 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 14:**

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

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

13 This response fails to comply with CCP § 2030.220 which states:

- 14 a) Each answer in a response to interrogatories shall be as complete and straightforward  
15 as the information reasonably available to the responding party permits.  
16 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
17 possible.  
18 (c) If the responding party does not have personal knowledge sufficient to respond  
19 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
20 faith effort to obtain the information by inquiry to other natural persons or  
21 organizations, except where the information is equally available to the propounding  
22 party.

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

26 **SPECIAL INTERROGATORY NO. 15:**

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

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

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

7 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 15:**

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

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

11 This response fails to comply with CCP § 2030.220 which states:

- 12 a) Each answer in a response to interrogatories shall be as complete and straightforward  
13 as the information reasonably available to the responding party permits.  
14 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
15 possible.  
16 (c) If the responding party does not have personal knowledge sufficient to respond  
17 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
18 faith effort to obtain the information by inquiry to other natural persons or  
19 organizations, except where the information is equally available to the propounding  
20 party.

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

24 **SPECIAL INTERROGATORY NO. 16:**

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

27 ///

28 ///

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

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

7 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 16:**

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

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

11 This response fails to comply with CCP § 2030.220 which states:

- 12 a) Each answer in a response to interrogatories shall be as complete and straightforward  
13 as the information reasonably available to the responding party permits.  
14 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
15 possible.  
16 (c) If the responding party does not have personal knowledge sufficient to respond  
17 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
18 faith effort to obtain the information by inquiry to other natural persons or  
19 organizations, except where the information is equally available to the propounding  
20 party.

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

28 **SPECIAL INTERROGATORY NO. 17:**

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

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

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

4 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 17:**

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

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

8 This response fails to comply with CCP § 2030.220 which states:

- 9 a) Each answer in a response to interrogatories shall be as complete and straightforward  
10 as the information reasonably available to the responding party permits.  
11 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
12 possible.  
13 (c) If the responding party does not have personal knowledge sufficient to respond  
14 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
15 faith effort to obtain the information by inquiry to other natural persons or  
16 organizations, except where the information is equally available to the propounding  
17 party.

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

21 **SPECIAL INTERROGATORY NO. 18:**

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

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

25 Plaintiff objects in full on the following grounds: 1) Not self-contained, refers to the  
26 complaint; 2) Premature contention as Plaintiff has not concluded discovery to determine all of the  
27 documents; 3) Will require a continuing duty to supplement; 4) Equally (or more) available to  
28



1 Pierattini as he is the one that caused his acts to be documented. 5) Unduly burdensome due to the  
2 long history of Pierattini harming Plaintiff.

3 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 18:**

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

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

7 This response fails to comply with CCP § 2030.220 which states:

- 8 a) Each answer in a response to interrogatories shall be as complete and straightforward  
9 as the information reasonably available to the responding party permits.  
10 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
11 possible.  
12 (c) If the responding party does not have personal knowledge sufficient to respond  
13 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
14 faith effort to obtain the information by inquiry to other natural persons or  
15 organizations, except where the information is equally available to the propounding  
16 party.

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

24 **SPECIAL INTERROGATORY NO. 20:**

25 IDENTIFY all WITNESSES that support YOUR seventh cause of action for “economic  
26 interference” against PIERATTINI.

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

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

1 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 20:**

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

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

7 This response fails to comply with CCP § 2030.220 which states:

- 8 a) Each answer in a response to interrogatories shall be as complete and straightforward  
9 as the information reasonably available to the responding party permits.  
10 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
11 possible.  
12 (c) If the responding party does not have personal knowledge sufficient to respond  
13 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
14 faith effort to obtain the information by inquiry to other natural persons or  
15 organizations, except where the information is equally available to the propounding  
16 party.

17 Plaintiff has not provided a responsive answer. This response is non-responsive. Also, there  
18 is a Protective Order in place. It is outrageous that Plaintiff has not properly responded to this  
19 Special Interrogatory in violation of the Court's Order and in the face of a Motion for Terminating  
20 Sanctions. It is over a year since these Special Interrogatories were served and over eight months  
21 since the May 2, 2024 Court Order. Plaintiff has had a lawyer since July and plainly the ability to  
22 properly respond. Plaintiff is simply flouting the Court's Order. Terminating Sanctions should be  
23 issued and Plaintiff's Complaint should be dismissed.

24 **SPECIAL INTERROGATORY NO. 21:**

25 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR seventh cause of action  
26 for “economic interference” against PIERATTINI.

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

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

1 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 21:**

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

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

10 This response fails to comply with CCP § 2030.220 which states:

- 11 a) Each answer in a response to interrogatories shall be as complete and straightforward  
12 as the information reasonably available to the responding party permits.  
13 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
14 possible.  
15 (c) If the responding party does not have personal knowledge sufficient to respond  
16 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
17 faith effort to obtain the information by inquiry to other natural persons or  
18 organizations, except where the information is equally available to the propounding  
19 party.

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

27 **SPECIAL INTERROGATORY NO. 22:**

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

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

Plaintiff objects in full on the following grounds: 1) Unduly burdensome due to the long  
history of Pierattini harming Plaintiff; 2) Premature contention as Plaintiff has not concluded

1 discovery to determine all of the facts; 3) Will require a continuing duty to supplement; 4) Equally  
2 (or more) available to Pierattini as he is the one that committed the acts; 5) Not self-contained, refers  
3 to the complaint.

4 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 22:**

5 Please see the PDF called, “Michael Pertini’s screenshots from his YouTube channel called  
6 blue bacon”

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

8 This response fails to comply with CCP § 2030.220 which states:

9 a) Each answer in a response to interrogatories shall be as complete and straightforward  
10 as the information reasonably available to the responding party permits.

11 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
12 possible.

13 (c) If the responding party does not have personal knowledge sufficient to respond  
14 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
15 faith effort to obtain the information by inquiry to other natural persons or  
16 organizations, except where the information is equally available to the propounding  
17 party.

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

25 **SPECIAL INTERROGATORY NO. 23:**

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

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

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

1 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 23:**

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

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

5 This response fails to comply with CCP § 2030.220 which states:

6 a) Each answer in a response to interrogatories shall be as complete and straightforward  
7 as the information reasonably available to the responding party permits.

8 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
9 possible.

10 (c) If the responding party does not have personal knowledge sufficient to respond  
11 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
12 faith effort to obtain the information by inquiry to other natural persons or  
13 organizations, except where the information is equally available to the propounding  
14 party.

15 Plaintiff has not provided a responsive answer. This response is non-responsive. Also, there  
16 is a Protective Order in place. It is outrageous that Plaintiff has not properly responded to this  
17 Special Interrogatory 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 Special Interrogatories were served and over eight months  
19 since 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 **SPECIAL INTERROGATORY NO. 24:**

23 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR eighth cause of action  
24 for "right to publicity torts" against PIERATTINI.

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

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

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1 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 24:**

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

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

6 This response fails to comply with CCP § 2030.220 which states:

- 7 a) Each answer in a response to interrogatories shall be as complete and straightforward  
8 as the information reasonably available to the responding party permits.  
9 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
10 possible.  
11 (c) If the responding party does not have personal knowledge sufficient to respond  
12 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
13 faith effort to obtain the information by inquiry to other natural persons or  
14 organizations, except where the information is equally available to the propounding  
15 party.

12 Plaintiff has not provided a responsive answer. This response is non-responsive. It is  
13 outrageous that Plaintiff has not properly responded to this Special Interrogatory in violation of the  
14 Court's Order and in the face of a Motion for Terminating Sanctions. It is over a year since these  
15 Special Interrogatories were served and over eight months since the May 2, 2024 Court  
16 Order. Plaintiff has had a lawyer since July and plainly the ability to properly respond. Plaintiff is  
17 simply flouting the Court's Order. Terminating Sanctions should be issued and Plaintiff's Complaint  
18 should be dismissed.

19 **SPECIAL INTERROGATORY NO. 25:**

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

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

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

28 ///

1 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 25:**

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

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

5 This response fails to comply with CCP § 2030.220 which states:

6 a) Each answer in a response to interrogatories shall be as complete and straightforward  
7 as the information reasonably available to the responding party permits.

8 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
9 possible.

10 (c) If the responding party does not have personal knowledge sufficient to respond  
11 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
12 faith effort to obtain the information by inquiry to other natural persons or  
13 organizations, except where the information is equally available to the propounding  
14 party.

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

22 **SPECIAL INTERROGATORY NO. 26:**

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

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

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

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1 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 26:**

2 [No response provided.]

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

4 This response fails to comply with CCP § 2030.220 which states:

5 a) Each answer in a response to interrogatories shall be as complete and straightforward  
6 as the information reasonably available to the responding party permits.

7 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
8 possible.

9 (c) If the responding party does not have personal knowledge sufficient to respond  
10 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
11 faith effort to obtain the information by inquiry to other natural persons or  
12 organizations, except where the information is equally available to the propounding  
13 party.

14 Plaintiff has not provided a response at all. It is outrageous that Plaintiff has not properly  
15 responded to this Special Interrogatory in violation of the Court's Order and in the face of a Motion  
16 for Terminating Sanctions. It is over a year since these Special Interrogatories were served and over  
17 eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since July and plainly  
18 the ability to properly respond. Plaintiff is simply flouting the Court's Order. Terminating  
19 Sanctions should be issued and Plaintiff's Complaint should be dismissed.

20 **SPECIAL INTERROGATORY NO. 27:**

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

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

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

29 **COURT ORDERED RESPONSE TO SPECIAL INTERROGATORY NO. 27:**

30 I am submitting several documents. However, I cannot submit every time Michael Pertini  
31 stalked me, harassed me, interfered with my job, harassed people who invest in me, and in my  
32 company, called my family members, called my friends. Many of my family and friends absolutely



1 refuse to be a part of any of the legal proceedings because of how much harassment they dealt with  
2 from Michael Pertini working as an agent for Troll mafia official.

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

4 This response fails to comply with CCP § 2030.220 which states:

5 a) Each answer in a response to interrogatories shall be as complete and straightforward  
6 as the information reasonably available to the responding party permits.

7 (b) If an interrogatory cannot be answered completely, it shall be answered to the extent  
8 possible.

9 (c) If the responding party does not have personal knowledge sufficient to respond  
10 fully to an interrogatory, that party shall so state, but shall make a reasonable and good  
11 faith effort to obtain the information by inquiry to other natural persons or  
12 organizations, except where the information is equally available to the propounding  
13 party.

14 Plaintiff has not provided a responsive answer. This response is non-responsive. It is  
15 outrageous that Plaintiff has not properly responded to this Special Interrogatory in violation of the  
16 Court's Order and in the face of a Motion for Terminating Sanctions. It is over a year since these  
17 Special Interrogatories were served and over eight months since the May 2, 2024 Court  
18 Order. Plaintiff has had a lawyer since July and plainly the ability to properly respond. Plaintiff is  
19 simply flouting the Court's Order. Terminating Sanctions should be issued and Plaintiff's Complaint  
20 should be dismissed.

21 DATED: January 31, 2025

22 THE LAW OFFICES OF  
23 R. PAUL KATRINAK



24 R. Paul Katrinak  
25 Attorneys for Defendant  
26 Michael Pierattini  
27  
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 SPECIAL INTERROGATORIES TO  
12 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

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