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

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 REQUESTS FOR**  
) **ADMISSION TO PLAINTIFF JOSE**  
) **DECASTRO, SET ONE**

15  
16 Date: February 21, 2024  
17 Time: 8:30 a.m.  
18 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 Defendant Michael Pierattini’s  
3 Requests for Admission to Plaintiff Jose DeCastro, Set One, as follows:

4 **THE REQUESTS FOR ADMISSION AT ISSUE IN THIS MOTION**

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

6 Admit that PIERATTINI has never entered onto YOUR property.

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

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

15 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

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

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

22 This response fails to comply with CCP § 2033.220 which states:

- 23 (a) Each answer in a response to requests for admission shall be as complete and  
24 straightforward as the information reasonably available to the responding party  
25 permits.  
26 (b) Each answer shall:  
27 (1) Admit so much of the matter involved in the request as is true, either as expressed  
28 in the request itself or as reasonably and clearly qualified by the responding party.  
(2) Deny so much of the matter involved in the request as is untrue.  
(3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.  
(c) If a responding party gives lack of information or knowledge as a reason for a  
failure to admit all or part of a request for admission, that party shall state in the answer

1 that a reasonable inquiry concerning the matter in the particular request has been made,  
2 and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

3 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
4 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
5 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
6 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
7 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 **REQUEST FOR ADMISSION NO. 23:**

10 Admit that PIERATTINI has never harmed YOUR property.

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

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

19 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

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

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

26 This response fails to comply with CCP § 2033.220 which states:

27 (a) Each answer in a response to requests for admission shall be as complete and  
28 straightforward as the information reasonably available to the responding party  
permits.

(b) Each answer shall:

(1) Admit so much of the matter involved in the request as is true, either as expressed in the request itself or as reasonably and clearly qualified by the responding party.

(2) Deny so much of the matter involved in the request as is untrue.

(3) Specify so much of the matter involved in the request as to the truth of which the responding party lacks sufficient information or knowledge.

(c) If a responding party gives lack of information or knowledge as a reason for a failure to admit all or part of a request for admission, that party shall state in the answer that a reasonable inquiry concerning the matter in the particular request has been made, and that the information known or readily obtainable is insufficient to enable that party to admit the matter.

It is outrageous that Plaintiff has not properly responded to this Request for Admission in violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to do was admit or deny the Request. It has been over a year since these Requests for Admission 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.

**REQUEST FOR ADMISSION NO. 24:**

Admit that PIERATTINI never admitted to the alleged theft of YOUR van.

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

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

**COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

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

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

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

10 This response fails to comply with CCP § 2033.220 which states:

11 (a) Each answer in a response to requests for admission shall be as complete and  
12 straightforward as the information reasonably available to the responding party  
permits.

13 (b) Each answer shall:

14 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

15 (2) Deny so much of the matter involved in the request as is untrue.

16 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

17 (c) If a responding party gives lack of information or knowledge as a reason for a  
18 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

19 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
20 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
21 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
22 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
23 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
24 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

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

26 Admit that PIERATTINI never took credit for the alleged theft of YOUR van.

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

28

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

8 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

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

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

14 This response fails to comply with CCP § 2033.220 which states:

- 15 (a) Each answer in a response to requests for admission shall be as complete and  
16 straightforward as the information reasonably available to the responding party  
17 permits.  
18 (b) Each answer shall:  
19 (1) Admit so much of the matter involved in the request as is true, either as expressed  
20 in the request itself or as reasonably and clearly qualified by the responding party.  
21 (2) Deny so much of the matter involved in the request as is untrue.  
22 (3) Specify so much of the matter involved in the request as to the truth of which the  
23 responding party lacks sufficient information or knowledge.  
24 (c) If a responding party gives lack of information or knowledge as a reason for a  
25 failure to admit all or part of a request for admission, that party shall state in the answer  
26 that a reasonable inquiry concerning the matter in the particular request has been made,  
27 and that the information known or readily obtainable is insufficient to enable that party  
28 to admit the matter.

23 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
24 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
25 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
26 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
27 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
28 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

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

2 Admit that PIERATTINI did not leave a bag of dog feces, a card stating, “Kate Always  
3 Wins,” and chocolate at YOUR front door.

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

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

12 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

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

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

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

25 This response fails to comply with CCP § 2033.220 which states:

26 (a) Each answer in a response to requests for admission shall be as complete and  
27 straightforward as the information reasonably available to the responding party  
permits.

28 (b) Each answer shall:

- 1 (1) Admit so much of the matter involved in the request as is true, either as expressed
- 2 in the request itself or as reasonably and clearly qualified by the responding party.
- 3 (2) Deny so much of the matter involved in the request as is untrue.
- 4 (3) Specify so much of the matter involved in the request as to the truth of which the
- 5 responding party lacks sufficient information or knowledge.
- 6 (c) If a responding party gives lack of information or knowledge as a reason for a
- 7 failure to admit all or part of a request for admission, that party shall state in the answer
- 8 that a reasonable inquiry concerning the matter in the particular request has been made,
- 9 and that the information known or readily obtainable is insufficient to enable that party
- 10 to admit the matter.

11 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
12 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
13 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
14 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
15 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
16 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

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

18 Admit that PIERATTINI did not leave balloons and a sign that read, "Kate's Tea Party" at  
19 YOUR friend's residence in New Hampshire.

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

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

28 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

Again, Michael Pertini was working in conjunction in a conspiracy with Kate, Peter and  
"Troll mafia". I have screenshots where he admits to being a part of this. I have not been allowed  
to submit them because I was incapable after being locked in jail for over 4 months; of course,  
later, I would be completely exonerated with a certificate of innocence. However. then for six



1 months after incarceration, I was experiencing such bad PTSD that I could not function. Thanks to  
2 the help of a counselor and getting back on to a healthy, fitness, lifestyle, I have broken through  
3 the PTSD and the brain fog.

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

5 This response fails to comply with CCP § 2033.220 which states:

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

8 (b) Each answer shall:

9 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

10 (2) Deny so much of the matter involved in the request as is untrue.

11 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

12 (c) If a responding party gives lack of information or knowledge as a reason for a  
failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

13  
14 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
15 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
16 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
17 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
18 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
19 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

20 **REQUEST FOR ADMISSION NO. 36:**

21 Admit that PIERATTINI did not watch YOUR livestream on May 3, 2022, to determine  
22 "when it would be best to harass" YOU.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 36:**

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

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

28 This response fails to comply with CCP § 2033.220 which states:

1 (a) Each answer in a response to requests for admission shall be as complete and  
2 straightforward as the information reasonably available to the responding party  
permits.

3 (b) Each answer shall:

4 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

5 (2) Deny so much of the matter involved in the request as is untrue.

6 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

7 (c) If a responding party gives lack of information or knowledge as a reason for a  
8 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

9 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
10 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
11 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
12 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
13 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 **REQUEST FOR ADMISSION NO. 37:**

16 Admit that PIERATTINI has not repeatedly emailed YOU.

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

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

21 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 37:**

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

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

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

8 This response fails to comply with CCP § 2033.220 which states:

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

11 (b) Each answer shall:

12 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

13 (2) Deny so much of the matter involved in the request as is untrue.

14 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

15 (c) If a responding party gives lack of information or knowledge as a reason for a  
16 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

17 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
18 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
19 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
20 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
21 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 **REQUEST FOR ADMISSION NO. 38:**

24 Admit that PIERATTINI has not cyberstalked YOU.

25 ///

26 ///

27 ///

28

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

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

5 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 38:**

6 *He absolutely has stalked me, and I am submitting proof today with just the screenshots*  
7 *alone from his live streams where he is colluding with "team skeptic", also known as David Omo,*  
8 *a defendant in this case. It is absolutely plain as day just from the, "right of publicity" screenshots*  
9 *from Michael Pertini's live stream that he was colluding with thousands of people, conspiring*  
10 *with thousands of people, to stalk me. The proof is in the screenshots from his live streams.*

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

12 This response fails to comply with CCP § 2033.220 which states:

- 13 (a) Each answer in a response to requests for admission shall be as complete and  
14 straightforward as the information reasonably available to the responding party  
permits.  
15 (b) Each answer shall:  
16 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.  
17 (2) Deny so much of the matter involved in the request as is untrue.  
18 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.  
19 (c) If a responding party gives lack of information or knowledge as a reason for a  
failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
20 to admit the matter.

21 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
22 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
23 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
24 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
25 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 **REQUEST FOR ADMISSION NO. 39:**

28 Admit that PIERATTINI has not stalked YOU.



1 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 40:**

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

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

14 This response fails to comply with CCP § 2033.220 which states:

- 15 (a) Each answer in a response to requests for admission shall be as complete and  
16 straightforward as the information reasonably available to the responding party  
17 permits.  
18 (b) Each answer shall:  
19 (1) Admit so much of the matter involved in the request as is true, either as expressed  
20 in the request itself or as reasonably and clearly qualified by the responding party.  
21 (2) Deny so much of the matter involved in the request as is untrue.  
22 (3) Specify so much of the matter involved in the request as to the truth of which the  
23 responding party lacks sufficient information or knowledge.  
24 (c) If a responding party gives lack of information or knowledge as a reason for a  
25 failure to admit all or part of a request for admission, that party shall state in the answer  
26 that a reasonable inquiry concerning the matter in the particular request has been made,  
27 and that the information known or readily obtainable is insufficient to enable that party  
28 to admit the matter.

23 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
24 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
25 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
26 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
27 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
28 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

1 **REQUEST FOR ADMISSION NO. 41:**

2 Admit that PIERATTINI has not trespassed on YOUR residence.

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

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

7 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 41:**

8 *Again, Michael Pertini, conspired with members of, "Troll mafia official" to come on my*  
9 *property and put dog shit on my steps. Michael Pertini is the kind of person who will write things*  
10 *in the discord, that I have screenshots of that I've never been submitted, because I'm being denied*  
11 *proper due process, where Michael Pertini states, "I would never be involved in putting dog shit*  
12 *on Chille's front porch"-*

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

14 This response fails to comply with CCP § 2033.220 which states:

- 15 (a) Each answer in a response to requests for admission shall be as complete and  
16 straightforward as the information reasonably available to the responding party  
permits.  
17 (b) Each answer shall:  
18 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.  
19 (2) Deny so much of the matter involved in the request as is untrue.  
(3) Specify so much of the matter involved in the request as to the truth of which the  
20 responding party lacks sufficient information or knowledge.  
(c) If a responding party gives lack of information or knowledge as a reason for a  
21 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
22 and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

23 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
24 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
25 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
26 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
27 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
28 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

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

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

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

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

8 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 42:**

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

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

18 This response fails to comply with CCP § 2033.220 which states:

- 19 (a) Each answer in a response to requests for admission shall be as complete and  
20 straightforward as the information reasonably available to the responding party  
permits.  
21 (b) Each answer shall:  
22 (1) Admit so much of the matter involved in the request as is true, either as expressed  
23 in the request itself or as reasonably and clearly qualified by the responding party.  
24 (2) Deny so much of the matter involved in the request as is untrue.  
25 (3) Specify so much of the matter involved in the request as to the truth of which the  
26 responding party lacks sufficient information or knowledge.  
27 (c) If a responding party gives lack of information or knowledge as a reason for a  
28 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

27 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
28 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to



1 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
2 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
3 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
4 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

5 **REQUEST FOR ADMISSION NO. 43:**

6 Admit that PIERATTINI has never harassed YOUR dog.

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

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

11 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 43:**

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

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

16 This response fails to comply with CCP § 2033.220 which states:

- 17 (a) Each answer in a response to requests for admission shall be as complete and  
18 straightforward as the information reasonably available to the responding party  
permits.  
19 (b) Each answer shall:  
20 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.  
21 (2) Deny so much of the matter involved in the request as is untrue.  
(3) Specify so much of the matter involved in the request as to the truth of which the  
22 responding party lacks sufficient information or knowledge.  
(c) If a responding party gives lack of information or knowledge as a reason for a  
23 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
24 and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

25 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
26 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
27 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
28 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since

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

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

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

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

10 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 44:**

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

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

15 This response fails to comply with CCP § 2033.220 which states:

- 16 (a) Each answer in a response to requests for admission shall be as complete and  
17 straightforward as the information reasonably available to the responding party  
permits.  
18 (b) Each answer shall:  
19 (1) Admit so much of the matter involved in the request as is true, either as expressed  
20 in the request itself or as reasonably and clearly qualified by the responding party.  
21 (2) Deny so much of the matter involved in the request as is untrue.  
22 (3) Specify so much of the matter involved in the request as to the truth of which the  
23 responding party lacks sufficient information or knowledge.  
24 (c) If a responding party gives lack of information or knowledge as a reason for a  
25 failure to admit all or part of a request for admission, that party shall state in the answer  
26 that a reasonable inquiry concerning the matter in the particular request has been made,  
27 and that the information known or readily obtainable is insufficient to enable that party  
28 to admit the matter.

24 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
25 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
26 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
27 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
28

1 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 **REQUEST FOR ADMISSION NO. 45:**

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

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

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

9 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 45:**

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

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

19 This response fails to comply with CCP § 2033.220 which states:

- 20 (a) Each answer in a response to requests for admission shall be as complete and  
21 straightforward as the information reasonably available to the responding party  
22 permits.  
23 (b) Each answer shall:  
24 (1) Admit so much of the matter involved in the request as is true, either as expressed  
25 in the request itself or as reasonably and clearly qualified by the responding party.  
26 (2) Deny so much of the matter involved in the request as is untrue.  
27 (3) Specify so much of the matter involved in the request as to the truth of which the  
28 responding party lacks sufficient information or knowledge.  
(c) If a responding party gives lack of information or knowledge as a reason for a  
failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

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

7 **REQUEST FOR ADMISSION NO. 46:**

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

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

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

14 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 46:**

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

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

27 This response fails to comply with CCP § 2033.220 which states:  
28

- 1 (a) Each answer in a response to requests for admission shall be as complete and  
2 straightforward as the information reasonably available to the responding party  
3 permits.  
4 (b) Each answer shall:  
5 (1) Admit so much of the matter involved in the request as is true, either as expressed  
6 in the request itself or as reasonably and clearly qualified by the responding party.  
7 (2) Deny so much of the matter involved in the request as is untrue.  
8 (3) Specify so much of the matter involved in the request as to the truth of which the  
9 responding party lacks sufficient information or knowledge.  
10 (c) If a responding party gives lack of information or knowledge as a reason for a  
11 failure to admit all or part of a request for admission, that party shall state in the answer  
12 that a reasonable inquiry concerning the matter in the particular request has been made,  
13 and that the information known or readily obtainable is insufficient to enable that party  
14 to admit the matter.

15 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
16 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
17 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
18 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
19 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
20 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

21 **REQUEST FOR ADMISSION NO. 47:**

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

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

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

28 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 47:**

[No response provided.]

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

This response fails to comply with CCP § 2033.220 which states:

- (a) Each answer in a response to requests for admission shall be as complete and straightforward as the information reasonably available to the responding party permits.  
(b) Each answer shall:  
(1) Admit so much of the matter involved in the request as is true, either as expressed in the request itself or as reasonably and clearly qualified by the responding party.

- 1 (2) Deny so much of the matter involved in the request as is untrue.  
2 (3) Specify so much of the matter involved in the request as to the truth of which the  
3 responding party lacks sufficient information or knowledge.  
4 (c) If a responding party gives lack of information or knowledge as a reason for a  
5 failure to admit all or part of a request for admission, that party shall state in the answer  
6 that a reasonable inquiry concerning the matter in the particular request has been made,  
7 and that the information known or readily obtainable is insufficient to enable that party  
8 to admit the matter.

9 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
10 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
11 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
12 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
13 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 **REQUEST FOR ADMISSION NO. 48:**

16 Admit that PIERATTINI has never written and/or stated in Defendant Peter's videos that he  
17 is actively tracking YOU.

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

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

22 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 48:**

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

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

This response fails to comply with CCP § 2033.220 which states:

- 1 (a) Each answer in a response to requests for admission shall be as complete and  
2 straightforward as the information reasonably available to the responding party  
3 permits.  
4 (b) Each answer shall:  
5 (1) Admit so much of the matter involved in the request as is true, either as expressed  
6 in the request itself or as reasonably and clearly qualified by the responding party.  
7 (2) Deny so much of the matter involved in the request as is untrue.  
8 (3) Specify so much of the matter involved in the request as to the truth of which the  
9 responding party lacks sufficient information or knowledge.  
10 (c) If a responding party gives lack of information or knowledge as a reason for a  
11 failure to admit all or part of a request for admission, that party shall state in the answer  
12 that a reasonable inquiry concerning the matter in the particular request has been made,  
13 and that the information known or readily obtainable is insufficient to enable that party  
14 to admit the matter.

15 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
16 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
17 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
18 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
19 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
20 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

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

22 Admit that PIERATTINI has never posted YOUR exact location in the "Live Chat" of one  
23 of YOUR live streams.

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

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

28 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 49:**

He absolutely did exactly that. It even goes further. Pertini, conspiring with his subscribers  
and, "Troll mafia official", in his live chat, in the evidence submitted today regarding, "right to  
publicity", one of Michael Pertini, subscribers, and a paying member of Michael Pertini's channel,  
the name of his YouTube username is, "StateLine Cabins" – where the user, "Sergeant blue bacon"  
had posted a picture of my vehicle in front of the state line cabins where I was sleeping. Thousands  
and thousands of people responded to this picture posted and Michael Pertini's subscribers created

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

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

11 This response fails to comply with CCP § 2033.220 which states:

12 (a) Each answer in a response to requests for admission shall be as complete and  
13 straightforward as the information reasonably available to the responding party  
permits.

14 (b) Each answer shall:

15 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

16 (2) Deny so much of the matter involved in the request as is untrue.

17 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

18 (c) If a responding party gives lack of information or knowledge as a reason for a  
19 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

20 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
21 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
22 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
23 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
24 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
25 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

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

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



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

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

5 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 50:**

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

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

15 This response fails to comply with CCP § 2033.220 which states:

- 16 (a) Each answer in a response to requests for admission shall be as complete and  
17 straightforward as the information reasonably available to the responding party  
18 permits.  
19 (b) Each answer shall:  
20 (1) Admit so much of the matter involved in the request as is true, either as expressed  
21 in the request itself or as reasonably and clearly qualified by the responding party.  
22 (2) Deny so much of the matter involved in the request as is untrue.  
23 (3) Specify so much of the matter involved in the request as to the truth of which the  
24 responding party lacks sufficient information or knowledge.  
25 (c) If a responding party gives lack of information or knowledge as a reason for a  
26 failure to admit all or part of a request for admission, that party shall state in the answer  
27 that a reasonable inquiry concerning the matter in the particular request has been made,  
28 and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

24 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
25 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
26 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
27 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
28

1 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 **REQUEST FOR ADMISSION NO. 51:**

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

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

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

10 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 51:**

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

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

15 This response fails to comply with CCP § 2033.220 which states:

16 (a) Each answer in a response to requests for admission shall be as complete and  
17 straightforward as the information reasonably available to the responding party  
permits.

18 (b) Each answer shall:

19 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

20 (2) Deny so much of the matter involved in the request as is untrue.

21 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

22 (c) If a responding party gives lack of information or knowledge as a reason for a  
failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

23  
24 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
25 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
26 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
27 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
28

1 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 **REQUEST FOR ADMISSION NO. 52:**

4 Admit that PIERATTINI has never had "obvious, malicious intentions" to cause YOU fear  
5 and panic.

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

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

10 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 52:**

11 *He absolutely did exactly that. As stated in previous answers, in his live streams, being*  
12 *submitted today regarding the, "right of publicity", his users are using, and creating screen names,*  
13 *docking my exact location, even my exact location where I'm driving on the freeway. When you are*  
14 *asleep in an Airbnb in the middle of nowhere, and Michael Pertini is conspiring to post your*  
15 *location, even up to where you are on the freeway, that is obvious malicious intent to cause me fear*  
16 *and panic.*

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

18 This response fails to comply with CCP § 2033.220 which states:

- 19 (a) Each answer in a response to requests for admission shall be as complete and  
20 straightforward as the information reasonably available to the responding party  
21 permits.  
22 (b) Each answer shall:  
23 (1) Admit so much of the matter involved in the request as is true, either as expressed  
24 in the request itself or as reasonably and clearly qualified by the responding party.  
25 (2) Deny so much of the matter involved in the request as is untrue.  
26 (3) Specify so much of the matter involved in the request as to the truth of which the  
27 responding party lacks sufficient information or knowledge.  
28 (c) If a responding party gives lack of information or knowledge as a reason for a  
failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

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

7 **REQUEST FOR ADMISSION NO. 53:**

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

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 53:**

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

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

15 This response fails to comply with CCP § 2033.220 which states:

16 (a) Each answer in a response to requests for admission shall be as complete and  
17 straightforward as the information reasonably available to the responding party  
permits.

18 (b) Each answer shall:

19 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

20 (2) Deny so much of the matter involved in the request as is untrue.

21 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

22 (c) If a responding party gives lack of information or knowledge as a reason for a  
23 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

24 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
25 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
26 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
27 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
28

1 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 **REQUEST FOR ADMISSION NO. 54:**

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

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

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

10 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 54:**

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

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

15 This response fails to comply with CCP § 2033.220 which states:

16 (a) Each answer in a response to requests for admission shall be as complete and  
17 straightforward as the information reasonably available to the responding party  
permits.

18 (b) Each answer shall:

19 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

20 (2) Deny so much of the matter involved in the request as is untrue.

21 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

22 (c) If a responding party gives lack of information or knowledge as a reason for a  
23 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

24 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
25 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
26 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
27 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
28

1 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 **REQUEST FOR ADMISSION NO. 55:**

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

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

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

9 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 55:**

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

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

18 This response fails to comply with CCP § 2033.220 which states:

- 19 (a) Each answer in a response to requests for admission shall be as complete and  
20 straightforward as the information reasonably available to the responding party  
21 permits.  
22 (b) Each answer shall:  
23 (1) Admit so much of the matter involved in the request as is true, either as expressed  
24 in the request itself or as reasonably and clearly qualified by the responding party.  
25 (2) Deny so much of the matter involved in the request as is untrue.  
26 (3) Specify so much of the matter involved in the request as to the truth of which the  
27 responding party lacks sufficient information or knowledge.  
28 (c) If a responding party gives lack of information or knowledge as a reason for a  
failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to

1 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
2 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
3 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
4 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

5 **REQUEST FOR ADMISSION NO. 56:**

6 Admit that PIERATTINI did not allegedly steal YOUR van.

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

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

11 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 56:**

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

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

18 This response fails to comply with CCP § 2033.220 which states:

- 19 (a) Each answer in a response to requests for admission shall be as complete and  
20 straightforward as the information reasonably available to the responding party  
permits.  
21 (b) Each answer shall:  
22 (1) Admit so much of the matter involved in the request as is true, either as expressed  
23 in the request itself or as reasonably and clearly qualified by the responding party.  
24 (2) Deny so much of the matter involved in the request as is untrue.  
25 (3) Specify so much of the matter involved in the request as to the truth of which the  
26 responding party lacks sufficient information or knowledge.  
27 (c) If a responding party gives lack of information or knowledge as a reason for a  
28 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to

1 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
2 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
3 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
4 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

5 **REQUEST FOR ADMISSION NO. 57:**

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

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

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

11 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 57:**

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

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

14 This response fails to comply with CCP § 2033.220 which states:

15 (a) Each answer in a response to requests for admission shall be as complete and  
16 straightforward as the information reasonably available to the responding party  
permits.

17 (b) Each answer shall:

18 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

19 (2) Deny so much of the matter involved in the request as is untrue.

20 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

21 (c) If a responding party gives lack of information or knowledge as a reason for a  
22 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

23 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
24 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
25 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
26 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
27 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
28 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.



1 **REQUEST FOR ADMISSION NO. 58:**

2 Admit that PIERATTINI has never stated that your allegedly stolen van is “under water” and  
3 “will never be found.”

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

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

8 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 58:**

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

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

17 This response fails to comply with CCP § 2033.220 which states:

- 18 (a) Each answer in a response to requests for admission shall be as complete and  
19 straightforward as the information reasonably available to the responding party  
20 permits.  
21 (b) Each answer shall:  
22 (1) Admit so much of the matter involved in the request as is true, either as expressed  
23 in the request itself or as reasonably and clearly qualified by the responding party.  
24 (2) Deny so much of the matter involved in the request as is untrue.  
25 (3) Specify so much of the matter involved in the request as to the truth of which the  
26 responding party lacks sufficient information or knowledge.  
27 (c) If a responding party gives lack of information or knowledge as a reason for a  
28 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

26 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
27 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
28 do was admit or deny the Request. It has been over a year since these Requests for Admission were

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

4 **REQUEST FOR ADMISSION NO. 59:**

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

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

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

11 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 59:**

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

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

15 This response fails to comply with CCP § 2033.220 which states:

16 (a) Each answer in a response to requests for admission shall be as complete and  
17 straightforward as the information reasonably available to the responding party  
permits.

18 (b) Each answer shall:

19 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

20 (2) Deny so much of the matter involved in the request as is untrue.

(3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

21 (c) If a responding party gives lack of information or knowledge as a reason for a  
22 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
23 to admit the matter.

24 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
25 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
26 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
27 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
28

1 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 **REQUEST FOR ADMISSION NO. 60:**

4 Admit that YOU have not been stalked by PIERATTINI.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 60:**

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

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

10 This response fails to comply with CCP § 2033.220 which states:

11 (a) Each answer in a response to requests for admission shall be as complete and  
12 straightforward as the information reasonably available to the responding party  
permits.

13 (b) Each answer shall:

14 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

15 (2) Deny so much of the matter involved in the request as is untrue.

16 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

17 (c) If a responding party gives lack of information or knowledge as a reason for a  
18 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

19 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
20 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
21 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
22 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
23 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
24 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

25 **REQUEST FOR ADMISSION NO. 61:**

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

28 ///

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

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

5 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 61:**

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

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

11 This response fails to comply with CCP § 2033.220 which states:

12 (a) Each answer in a response to requests for admission shall be as complete and  
13 straightforward as the information reasonably available to the responding party  
permits.

14 (b) Each answer shall:

15 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

16 (2) Deny so much of the matter involved in the request as is untrue.

17 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

18 (c) If a responding party gives lack of information or knowledge as a reason for a  
failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

19  
20 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
21 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
22 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
23 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
24 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
25 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

26 **REQUEST FOR ADMISSION NO. 62:**

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

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

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

5 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 62:**

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

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

11 This response fails to comply with CCP § 2033.220 which states:

12 (a) Each answer in a response to requests for admission shall be as complete and  
13 straightforward as the information reasonably available to the responding party  
permits.

14 (b) Each answer shall:

15 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

16 (2) Deny so much of the matter involved in the request as is untrue.

17 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

18 (c) If a responding party gives lack of information or knowledge as a reason for a  
19 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

20 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
21 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
22 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
23 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
24 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
25 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

26 ///

27 ///

28 ///

1 **REQUEST FOR ADMISSION NO. 63:**

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

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

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

9 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 63:**

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

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

14 This response fails to comply with CCP § 2033.220 which states:

- 15 (a) Each answer in a response to requests for admission shall be as complete and  
16 straightforward as the information reasonably available to the responding party  
permits.  
17 (b) Each answer shall:  
18 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.  
19 (2) Deny so much of the matter involved in the request as is untrue.  
(3) Specify so much of the matter involved in the request as to the truth of which the  
20 responding party lacks sufficient information or knowledge.  
(c) If a responding party gives lack of information or knowledge as a reason for a  
21 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
22 and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

23 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
24 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
25 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
26 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
27 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
28 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

1 **REQUEST FOR ADMISSION NO. 64:**

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

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

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

8 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 64:**

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

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

14 This response fails to comply with CCP § 2033.220 which states:

- 15 (a) Each answer in a response to requests for admission shall be as complete and  
16 straightforward as the information reasonably available to the responding party  
17 permits.  
18 (b) Each answer shall:  
19 (1) Admit so much of the matter involved in the request as is true, either as expressed  
20 in the request itself or as reasonably and clearly qualified by the responding party.  
21 (2) Deny so much of the matter involved in the request as is untrue.  
22 (3) Specify so much of the matter involved in the request as to the truth of which the  
23 responding party lacks sufficient information or knowledge.  
24 (c) If a responding party gives lack of information or knowledge as a reason for a  
25 failure to admit all or part of a request for admission, that party shall state in the answer  
26 that a reasonable inquiry concerning the matter in the particular request has been made,  
27 and that the information known or readily obtainable is insufficient to enable that party  
28 to admit the matter.

23 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
24 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
25 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
26 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
27 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
28 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

1 **REQUEST FOR ADMISSION NO. 65:**

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

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

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

8 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 65:**

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

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

17 This response fails to comply with CCP § 2033.220 which states:

- 18 (a) Each answer in a response to requests for admission shall be as complete and  
19 straightforward as the information reasonably available to the responding party  
20 permits.  
21 (b) Each answer shall:  
22 (1) Admit so much of the matter involved in the request as is true, either as expressed  
23 in the request itself or as reasonably and clearly qualified by the responding party.  
24 (2) Deny so much of the matter involved in the request as is untrue.  
25 (3) Specify so much of the matter involved in the request as to the truth of which the  
26 responding party lacks sufficient information or knowledge.  
27 (c) If a responding party gives lack of information or knowledge as a reason for a  
28 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

26 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
27 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
28 do was admit or deny the Request. It has been over a year since these Requests for Admission were



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

4 **REQUEST FOR ADMISSION NO. 66:**

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

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

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

11 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 66:**

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

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

18 This response fails to comply with CCP § 2033.220 which states:

- 19 (a) Each answer in a response to requests for admission shall be as complete and  
20 straightforward as the information reasonably available to the responding party  
permits.  
21 (b) Each answer shall:  
22 (1) Admit so much of the matter involved in the request as is true, either as expressed  
23 in the request itself or as reasonably and clearly qualified by the responding party.  
24 (2) Deny so much of the matter involved in the request as is untrue.  
25 (3) Specify so much of the matter involved in the request as to the truth of which the  
26 responding party lacks sufficient information or knowledge.  
27 (c) If a responding party gives lack of information or knowledge as a reason for a  
28 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to

1 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
2 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
3 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
4 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

5 **REQUEST FOR ADMISSION NO. 67:**

6 Admit that YOUR mother has never received an allegedly harassing phone call from  
7 PIERATTINI.

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

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

12 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 67:**

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

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

23 This response fails to comply with CCP § 2033.220 which states:

24 (a) Each answer in a response to requests for admission shall be as complete and  
25 straightforward as the information reasonably available to the responding party  
permits.

26 (b) Each answer shall:

27 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

28 (2) Deny so much of the matter involved in the request as is untrue.

(3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

1 (c) If a responding party gives lack of information or knowledge as a reason for a  
2 failure to admit all or part of a request for admission, that party shall state in the answer  
3 that a reasonable inquiry concerning the matter in the particular request has been made,  
4 and that the information known or readily obtainable is insufficient to enable that party  
5 to admit the matter.

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

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

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

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

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

19 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 68:**

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

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

25 This response fails to comply with CCP § 2033.220 which states:

26 (a) Each answer in a response to requests for admission shall be as complete and  
27 straightforward as the information reasonably available to the responding party  
28 permits.

(b) Each answer shall:

(1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

(2) Deny so much of the matter involved in the request as is untrue.

(3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

1 (c) If a responding party gives lack of information or knowledge as a reason for a  
2 failure to admit all or part of a request for admission, that party shall state in the answer  
3 that a reasonable inquiry concerning the matter in the particular request has been made,  
4 and that the information known or readily obtainable is insufficient to enable that party  
5 to admit the matter.

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

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

13 Admit that none of YOUR "smalltown-friends" has ever received an allegedly harassing  
14 phone call from PIERATTINI.

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

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

19 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 69:**

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

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

26 This response fails to comply with CCP § 2033.220 which states:

- 27 (a) Each answer in a response to requests for admission shall be as complete and  
28 straightforward as the information reasonably available to the responding party  
permits.  
(b) Each answer shall:  
(1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.  
(2) Deny so much of the matter involved in the request as is untrue.

1 (3) Specify so much of the matter involved in the request as to the truth of which the  
2 responding party lacks sufficient information or knowledge.  
3 (c) If a responding party gives lack of information or knowledge as a reason for a  
4 failure to admit all or part of a request for admission, that party shall state in the answer  
5 that a reasonable inquiry concerning the matter in the particular request has been made,  
6 and that the information known or readily obtainable is insufficient to enable that party  
7 to admit the matter.

8 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
9 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
10 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
11 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
12 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
13 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

14 **REQUEST FOR ADMISSION NO. 70:**

15 Admit that PIERATTINI has not contacted any of the "62 young men" YOU graduated with  
16 in 1992

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

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

21 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 70:**

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

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

26 This response fails to comply with CCP § 2033.220 which states:

- 27 (a) Each answer in a response to requests for admission shall be as complete and  
28 straightforward as the information reasonably available to the responding party  
permits.  
(b) Each answer shall:  
(1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.  
(2) Deny so much of the matter involved in the request as is untrue.  
(3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

1 (c) If a responding party gives lack of information or knowledge as a reason for a  
2 failure to admit all or part of a request for admission, that party shall state in the answer  
3 that a reasonable inquiry concerning the matter in the particular request has been made,  
4 and that the information known or readily obtainable is insufficient to enable that party  
5 to admit the matter.

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

12 **REQUEST FOR ADMISSION NO. 71:**

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

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

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

19 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 71:**

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

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

25 This response fails to comply with CCP § 2033.220 which states:

- 26 (a) Each answer in a response to requests for admission shall be as complete and  
27 straightforward as the information reasonably available to the responding party  
28 permits.  
(b) Each answer shall:  
(1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.  
(2) Deny so much of the matter involved in the request as is untrue.  
(3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

1 (c) If a responding party gives lack of information or knowledge as a reason for a  
2 failure to admit all or part of a request for admission, that party shall state in the answer  
3 that a reasonable inquiry concerning the matter in the particular request has been made,  
4 and that the information known or readily obtainable is insufficient to enable that party  
5 to admit the matter.

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

12 **REQUEST FOR ADMISSION NO. 72:**

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

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

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

20 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 72:**

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

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

27 This response fails to comply with CCP § 2033.220 which states:

- 28 (a) Each answer in a response to requests for admission shall be as complete and straightforward as the information reasonably available to the responding party permits.  
(b) Each answer shall:

- (1) Admit so much of the matter involved in the request as is true, either as expressed in the request itself or as reasonably and clearly qualified by the responding party.
- (2) Deny so much of the matter involved in the request as is untrue.
- (3) Specify so much of the matter involved in the request as to the truth of which the responding party lacks sufficient information or knowledge.
- (c) If a responding party gives lack of information or knowledge as a reason for a failure to admit all or part of a request for admission, that party shall state in the answer that a reasonable inquiry concerning the matter in the particular request has been made, and that the information known or readily obtainable is insufficient to enable that party to admit the matter.

It is outrageous that Plaintiff has not properly responded to this Request for Admission in violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to do was admit or deny the Request. It has been over a year since these Requests for Admission 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.

**REQUEST FOR ADMISSION NO. 73:**

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

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

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

**COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 73:**

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

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

This response fails to comply with CCP § 2033.220 which states:

- (a) Each answer in a response to requests for admission shall be as complete and straightforward as the information reasonably available to the responding party permits.
- (b) Each answer shall:
  - (1) Admit so much of the matter involved in the request as is true, either as expressed in the request itself or as reasonably and clearly qualified by the responding party.



- 1 (2) Deny so much of the matter involved in the request as is untrue.  
2 (3) Specify so much of the matter involved in the request as to the truth of which the  
3 responding party lacks sufficient information or knowledge.  
4 (c) If a responding party gives lack of information or knowledge as a reason for a  
5 failure to admit all or part of a request for admission, that party shall state in the answer  
6 that a reasonable inquiry concerning the matter in the particular request has been made,  
7 and that the information known or readily obtainable is insufficient to enable that party  
8 to admit the matter.  
9

10 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
11 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
12 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
13 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
14 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 **REQUEST FOR ADMISSION NO. 74:**

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

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

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

23 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 74:**

24 *Again, Michael Pertini is working in a conspiracy. Michael Pertini is deeply involved with,*  
25 *“Troll mafia official”. In the screenshots from his live stream today, during his live chat,*  
26 *codefendant, David Omo (also known as team skeptic), where Omo clearly POSTS a comment in the*  
27 *livestream that that he will speak with Michael Pertini in the discord “troll mafia official” after*  
28 *his(Pierattini’s) live stream ends.*

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

This response fails to comply with CCP § 2033.220 which states:

- (a) Each answer in a response to requests for admission shall be as complete and straightforward as the information reasonably available to the responding party permits.  
(b) Each answer shall:

- 1 (1) Admit so much of the matter involved in the request as is true, either as expressed  
2 in the request itself or as reasonably and clearly qualified by the responding party.  
3 (2) Deny so much of the matter involved in the request as is untrue.  
4 (3) Specify so much of the matter involved in the request as to the truth of which the  
5 responding party lacks sufficient information or knowledge.  
6 (c) If a responding party gives lack of information or knowledge as a reason for a  
7 failure to admit all or part of a request for admission, that party shall state in the answer  
8 that a reasonable inquiry concerning the matter in the particular request has been made,  
9 and that the information known or readily obtainable is insufficient to enable that party  
10 to admit the matter.

11 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
12 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
13 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
14 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
15 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
16 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

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

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

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

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

24 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 75:**

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

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

This response fails to comply with CCP § 2033.220 which states:

- 1 (a) Each answer in a response to requests for admission shall be as complete and  
2 straightforward as the information reasonably available to the responding party  
3 permits.  
4 (b) Each answer shall:  
5 (1) Admit so much of the matter involved in the request as is true, either as expressed  
6 in the request itself or as reasonably and clearly qualified by the responding party.  
7 (2) Deny so much of the matter involved in the request as is untrue.  
8 (3) Specify so much of the matter involved in the request as to the truth of which the  
9 responding party lacks sufficient information or knowledge.  
10 (c) If a responding party gives lack of information or knowledge as a reason for a  
11 failure to admit all or part of a request for admission, that party shall state in the answer  
12 that a reasonable inquiry concerning the matter in the particular request has been made,  
13 and that the information known or readily obtainable is insufficient to enable that party  
14 to admit the matter.

15 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
16 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
17 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
18 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
19 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
20 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

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

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

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

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

28 **COURT ORDERED RESPONSE TO REQUEST FOR ADMISSION NO. 76:**

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

///  
28

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

2 This response fails to comply with CCP § 2033.220 which states:

3 (a) Each answer in a response to requests for admission shall be as complete and  
4 straightforward as the information reasonably available to the responding party  
permits.

5 (b) Each answer shall:

6 (1) Admit so much of the matter involved in the request as is true, either as expressed  
in the request itself or as reasonably and clearly qualified by the responding party.

7 (2) Deny so much of the matter involved in the request as is untrue.

8 (3) Specify so much of the matter involved in the request as to the truth of which the  
responding party lacks sufficient information or knowledge.

9 (c) If a responding party gives lack of information or knowledge as a reason for a  
10 failure to admit all or part of a request for admission, that party shall state in the answer  
that a reasonable inquiry concerning the matter in the particular request has been made,  
and that the information known or readily obtainable is insufficient to enable that party  
to admit the matter.

11 It is outrageous that Plaintiff has not properly responded to this Request for Admission in  
12 violation of the Court's Order and in the face of a Motion for Terminating Sanctions. All he had to  
13 do was admit or deny the Request. It has been over a year since these Requests for Admission were  
14 served and over eight months since the May 2, 2024 Court Order. Plaintiff has had a lawyer since  
15 July and plainly the ability to properly respond. Plaintiff is simply flouting the Court's  
16 Order. Terminating Sanctions should be issued and Plaintiff's Complaint should be dismissed.

17  
18 DATED: January 31, 2025

19 THE LAW OFFICES OF  
20 R. PAUL KATRINAK



21 R. Paul Katrinak  
22 Attorneys for Defendant  
23 Michael Pierattini  
24  
25  
26  
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 REQUESTS FOR ADMISSION 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.

  
R. Paul Katrinak

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