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Superior Court of California,
County of Los Angeles
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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 TO COMPEL**
) **FURTHER RESPONSES TO DEFENDANT**
) **MICHAEL PIERATTINI'S SPECIAL**
) **INTERROGATORIES TO PLAINTIFF**
) **JOSE DECASTRO, SET ONE, AND**
) **REQUEST FOR MONETARY**
) **SANCTIONS AGAINST PLAINTIFF IN**
) **THE SUM OF \$4,560.00**

15 _____
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17 Date: March 7, 2024
18 Time: 8:30 a.m.
19 Dept: O

20 **RES ID: 171178967765**
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1 Defendant Michael Pierattini (“Mr. Pierattini”) hereby submits this Separate Statement in
2 support of his Motion to Compel Further Responses to Defendant Michael Pierattini’s Special
3 Interrogatories to Plaintiff Jose DeCastro, Set One, and Request for Monetary Sanctions Against
4 Plaintiff (the “Motion”) as follows:

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

6 **SPECIAL INTERROGATORY NO. 1**

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

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

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

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

20 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 1**

21 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

9 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
10 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
11 therefore supported by good cause. This request is specifically tailored to obtain information that is
12 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
13 him. Therefore, a proper response should be compelled.

14 **SPECIAL INTERROGATORY NO. 2:**

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

17 (*“WITNESSES,” as used in these Special Interrogatories, shall mean any natural individual,*
18 *firm, association, partnership, corporation, public entity, or any other form of legal entity or*
19 *governmental body unless the context indicates otherwise. “IDENTIFY,” as used in these Special*
20 *Interrogatories when referring to WITNESSES, shall mean to provide the witness’s name, address,*
21 *telephone number, email address, employer, and job title.)*

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

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

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1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 2**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
25 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
26 therefore supported by good cause. This request is specifically tailored to obtain information that is
27 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
28 him. Therefore, a proper response should be compelled.

29 **SPECIAL INTERROGATORY NO. 3:**

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

32 (“DOCUMENTS,” as used in these *Special Interrogatories*, shall have the same meaning as
33 the term “Writing” as defined in *Evidence Code § 250* and shall include any medium upon which
34 intelligence or information can be recorded, maintained or retrieved, including without limitation,
35 any handwritten, typed, printed, electronic, graphic or illustrative material of any kind or

1 *description, including drafts and final versions, however produced or reproduced, whether reduced*
2 *to hard copy or prepared and/or maintained in electronic form and regardless of whether approved,*
3 *signed, sent, received, redrafted, prepared by or for or in YOUR possession, custody, or control.*
4 *“DESCRIBE,” as used in these Special Interrogatories when referring to an event, behavior,*
5 *communication, person, or thing, shall mean to include the date(s), a detailed description, and the*
6 *names and contact information of anyone related to the event, behavior, communication, person, or*
7 *thing. “IDENTIFY,” as used in these Special Interrogatories when referring to a DOCUMENT,*
8 *shall mean to provide a description of the DOCUMENT including the name(s) of the person(s) who*
9 *prepared the DOCUMENT, the recipient of the DOCUMENT, the date the DOCUMENT was*
10 *prepared, the date the DOCUMENT was transmitted, the content of the DOCUMENT and all*
11 *persons believed to be in possession of the DOCUMENT.)*

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

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

18 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 3**

19 **SHOULD BE COMPELLED:**

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

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

26 Plaintiff has not provided a responsive answer, and there is no indication in the response that
27 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

28 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of

1 improper objections. As explained in *Brown & Weil*:

2 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
3 the responding party may serve objections. ... Objections must be specific. A motion
4 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
5 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
6 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
7 objections; and ¶8:1920]”
8 *Id.* at 8:1071.

9 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
10 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
11 therefore supported by good cause. This request is specifically tailored to obtain information that is
12 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
13 him. Therefore, a proper response should be compelled.

14 **SPECIAL INTERROGATORY NO. 4:**

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

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

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

23 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 4**

24 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
13 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
14 and is therefore supported by good cause. This request is specifically tailored to obtain information
15 that is essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims
16 against him. Therefore, a proper response should be compelled.

17 **SPECIAL INTERROGATORY NO. 5:**

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

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

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

25 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 5**
26 **SHOULD BE COMPELLED:**

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

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

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

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

Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of improper objections. As explained in *Brown & Weil*:

“[8:1071] Objections: In lieu of answering or allowing inspection of records, above, the responding party may serve objections. ... Objections must be specific. A motion to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate” objections; and ¶[8:1920]”
Id. at 8:1071.

Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is therefore supported by good cause. This request is specifically tailored to obtain information that is essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper response should be compelled.

SPECIAL INTERROGATORY NO. 6:

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

RESPONSE TO SPECIAL INTERROGATORY NO. 6:

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

REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 6

SHOULD BE COMPELLED:

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

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

10 Plaintiff has not provided a responsive answer, and there is no indication in the response that
11 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

12 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
13 improper objections. As explained in *Brown & Weil*:

14 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
15 the responding party may serve objections. ... Objections must be specific. A motion
16 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
17 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
18 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
19 objections; and ¶8:1920]”
20 *Id.* at 8:1071.

21 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
22 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
23 therefore supported by good cause. This request is specifically tailored to obtain information that is
24 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
25 him. Therefore, a proper response should be compelled.

26 **SPECIAL INTERROGATORY NO. 7:**

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

RESPONSE TO SPECIAL INTERROGATORY NO. 7:

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

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1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 7**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
25 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
26 therefore supported by good cause. This request is specifically tailored to obtain information that is
27 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
28 him. Therefore, a proper response should be compelled.

29 **SPECIAL INTERROGATORY NO. 8:**

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

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

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

3 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 8**

4 **SHOULD BE COMPELLED:**

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

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

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

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

11 Plaintiff has not provided a responsive answer, and there is no indication in the response that
12 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

13 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
14 improper objections. As explained in *Brown & Weil*:

15 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
16 the responding party may serve objections. ... Objections must be specific. A motion
17 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
18 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
19 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
20 objections; and ¶[8:1920]”
21 *Id.* at 8:1071.

19 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
20 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
21 therefore supported by good cause. This request is specifically tailored to obtain information that is
22 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
23 him. Therefore, a proper response should be compelled.

24 **SPECIAL INTERROGATORY NO. 9:**

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

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

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

7 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 9**

8 **SHOULD BE COMPELLED:**

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

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

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. This request is specifically tailored to obtain information that is
32 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
33 him. Therefore, a proper response should be compelled.

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1 **SPECIAL INTERROGATORY NO. 10:**

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

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

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

10 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 10**

11 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. This request is specifically tailored to obtain information that is

1 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
2 him. Therefore, a proper response should be compelled.

3 **SPECIAL INTERROGATORY NO. 11:**

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

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

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

11 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 11**
12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶[8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
28 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is

1 therefore supported by good cause. This request is specifically tailored to obtain information that is
2 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
3 him. Therefore, a proper response should be compelled.

4 **SPECIAL INTERROGATORY NO. 12:**

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

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

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

13 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 12**

14 **SHOULD BE COMPELLED:**

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

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

21 Plaintiff has not provided a responsive answer, and there is no indication in the response that
22 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

23 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
24 improper objections. As explained in *Brown & Weil*:

25 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
26 the responding party may serve objections. ... Objections must be specific. A motion
27 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
28 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

1 Plaintiff's objection has no specificity and does not state the specific grounds for objection. This
2 interrogatory is directly based on Plaintiff's allegations against Mr. Pierattini in the complaint and is
3 therefore supported by good cause. This request is specifically tailored to obtain information that is
4 essential to supporting Mr. Pierattini's defenses against Plaintiff's unsubstantiated claims against
5 him. Therefore, a proper response should be compelled.

6 **SPECIAL INTERROGATORY NO. 13:**

7 State all facts that establish that PIERATTINI is allegedly liable for YOUR fifth cause of
8 action for "stalking, cyberstalking, and civil conspiracy" against PIERATTINI.

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

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

15 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 13**

16 **SHOULD BE COMPELLED:**

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

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

23 Plaintiff has not provided a responsive answer, and there is no indication in the response that
24 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

25 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
26 improper objections. As explained in Brown & Weil:

27 "[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
28 the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are "too general." [CCP § 2030.300(a)(3); see *Korea*

1 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
2 objections; and ¶[8:1920]”
3 *Id.* at 8:1071.

4 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
5 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
6 therefore supported by good cause. This request is specifically tailored to obtain information that is
7 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
8 him. Therefore, a proper response should be compelled.

9 **SPECIAL INTERROGATORY NO. 14:**

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

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

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

17 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 14**

18 **SHOULD BE COMPELLED:**

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

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

29 Plaintiff has not provided a responsive answer, and there is no indication in the response that
30 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

31 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
32 improper objections. As explained in *Brown & Weil*:

33 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,

1 the responding party may serve objections. ... Objections must be specific. A motion
2 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
3 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
4 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
5 objections; and ¶8:1920]”
6 *Id.* at 8:1071.

7 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
8 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
9 therefore supported by good cause. This request is specifically tailored to obtain information that is
10 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
11 him. Therefore, a proper response should be compelled.

12 **SPECIAL INTERROGATORY NO. 15:**

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

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

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

21 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 15**

22 **SHOULD BE COMPELLED:**

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

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

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

Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of

1 improper objections. As explained in *Brown & Weil*:

2 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
3 the responding party may serve objections. ... Objections must be specific. A motion
4 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
5 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
6 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
7 objections; and ¶8:1920]”
8 *Id.* at 8:1071.

9 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
10 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
11 therefore supported by good cause. This request is specifically tailored to obtain information that is
12 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
13 him. Therefore, a proper response should be compelled.

14 **SPECIAL INTERROGATORY NO. 16:**

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

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

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

23 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 16**

24 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. This request is specifically tailored to obtain information that is
15 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
16 him. Therefore, a proper response should be compelled.

17 **SPECIAL INTERROGATORY NO. 17:**

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

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

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

25 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 17**

26 **SHOULD BE COMPELLED:**

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

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

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

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

4 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
 5 improper objections. As explained in *Brown & Weil*:

6 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
 7 the responding party may serve objections. ... Objections must be specific. A motion
 8 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
 9 Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
 10 objections; and ¶[8:1920]”
 11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
 13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
 14 therefore supported by good cause. This request is specifically tailored to obtain information that is
 15 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
 16 him. Therefore, a proper response should be compelled.

17 **SPECIAL INTERROGATORY NO. 18:**

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

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

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

26 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 18
 27 SHOULD BE COMPELLED:**

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

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

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

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

10 Plaintiff has not provided a responsive answer, and there is no indication in the response that
11 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

12 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
13 improper objections. As explained in *Brown & Weil*:

14 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
15 the responding party may serve objections. ... Objections must be specific. A motion
16 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
17 Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
18 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
19 objections; and ¶8:1920]”
20 *Id.* at 8:1071.

21 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
22 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
23 therefore supported by good cause. This request is specifically tailored to obtain information that is
24 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
25 him. Therefore, a proper response should be compelled.

26 **SPECIAL INTERROGATORY NO. 19:**

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

RESPONSE TO SPECIAL INTERROGATORY NO. 19:

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

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1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 19**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶[8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
25 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
26 therefore supported by good cause. This request is specifically tailored to obtain information that is
27 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
28 him. Therefore, a proper response should be compelled.

29 **SPECIAL INTERROGATORY NO. 20:**

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

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

33 Plaintiff objects in part on the following grounds: 1) Premature contention as Plaintiff has
34 not concluded discovery to determine all of the witnesses; 2) Equally (or more) available to

1 Pierattini as he is the one that knows who was there when he harmed Plaintiff; 3) Lack of personal
2 knowledge; 4) Not self-contained, refers to the complaint.

3 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 20**

4 **SHOULD BE COMPELLED:**

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

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

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

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

11 Plaintiff has not provided a responsive answer, and there is no indication in the response that
12 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

13 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
14 improper objections. As explained in *Brown & Weil*:

15 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
16 the responding party may serve objections. ... Objections must be specific. A motion
17 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
18 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
19 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
20 objections; and ¶[8:1920]”
21 *Id.* at 8:1071.

19 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
20 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
21 therefore supported by good cause. This request is specifically tailored to obtain information that is
22 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
23 him. Therefore, a proper response should be compelled.

24 **SPECIAL INTERROGATORY NO. 21:**

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

27 ///

28 ///

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

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

7 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 21**

8 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶[8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. This request is specifically tailored to obtain information that is
32 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
33 him. Therefore, a proper response should be compelled.

34 ///

1 **SPECIAL INTERROGATORY NO. 22:**

2 State all facts that establish that PIERATTINI is allegedly liable for YOUR eighth cause of
3 action for “right to publicity torts” against PIERATTINI.

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

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

10 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 22**

11 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. This request is specifically tailored to obtain information that is

1 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
2 him. Therefore, a proper response should be compelled.

3 **SPECIAL INTERROGATORY NO. 23:**

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

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

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

11 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 23**
12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in Brown & Weil:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶[8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
28 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is

1 therefore supported by good cause. This request is specifically tailored to obtain information that is
2 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
3 him. Therefore, a proper response should be compelled.

4 **SPECIAL INTERROGATORY NO. 24:**

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

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

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

13 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 24**

14 **SHOULD BE COMPELLED:**

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

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

21 Plaintiff has not provided a responsive answer, and there is no indication in the response that
22 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

23 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
24 improper objections. As explained in *Brown & Weil*:

25 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
26 the responding party may serve objections. ... Objections must be specific. A motion
27 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
28 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

1 Plaintiff's objection has no specificity and does not state the specific grounds for objection. This
2 interrogatory is directly based on Plaintiff's allegations against Mr. Pierattini in the complaint and is
3 therefore supported by good cause. This request is specifically tailored to obtain information that is
4 essential to supporting Mr. Pierattini's defenses against Plaintiff's unsubstantiated claims against
5 him. Therefore, a proper response should be compelled.

6 **SPECIAL INTERROGATORY NO. 25:**

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

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

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

15 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 25**

16 **SHOULD BE COMPELLED:**

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

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

23 Plaintiff has not provided a responsive answer, and there is no indication in the response that
24 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

25 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
26 improper objections. As explained in Brown & Weil:

27 "[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
28 the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are "too general." [CCP § 2030.300(a)(3); see *Korea*

1 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
2 objections; and ¶8:1920”
3 *Id.* at 8:1071.

4 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
5 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
6 therefore supported by good cause. This request is specifically tailored to obtain information that is
7 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
8 him. Therefore, a proper response should be compelled.

9 **SPECIAL INTERROGATORY NO. 26:**

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

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

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

17 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 26**

18 **SHOULD BE COMPELLED:**

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

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

29 Plaintiff has not provided a responsive answer, and there is no indication in the response that
30 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

31 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
32 improper objections. As explained in *Brown & Weil*:

33 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,

1 the responding party may serve objections. ... Objections must be specific. A motion
2 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
3 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
4 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
5 objections; and ¶8:1920]”
6 *Id.* at 8:1071.

7 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
8 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
9 therefore supported by good cause. This request is specifically tailored to obtain information that is
10 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
11 him. Therefore, a proper response should be compelled.

12 **SPECIAL INTERROGATORY NO. 27:**

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

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

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

21 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 27**

22 **SHOULD BE COMPELLED:**

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

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

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

Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of

1 improper objections. As explained in *Brown & Weil*:

2 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
3 the responding party may serve objections. ... Objections must be specific. A motion
4 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
5 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
6 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
7 objections; and ¶8:1920]”
8 *Id.* at 8:1071.

9 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
10 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
11 therefore supported by good cause. This request is specifically tailored to obtain information that is
12 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
13 him. Therefore, a proper response should be compelled.

14 **SPECIAL INTERROGATORY NO. 28:**

15 State all facts that support YOUR position in Paragraph 12 of YOUR Complaint that
16 PIERATTINI allegedly “has hidden behind a false identity for many years”.

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

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

23 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 28**

24 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. This request is specifically tailored to obtain information that is
15 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
16 him. Therefore, a proper response should be compelled.

17 **SPECIAL INTERROGATORY NO. 29:**

18 IDENTIFY all WITNESSES that support YOUR position in Paragraph 12 of YOUR
19 Complaint that PIERATTINI allegedly “has hidden behind a false identity for many years”.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 29:**

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

25 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 29**

26 **SHOULD BE COMPELLED:**

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

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

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

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

4 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
5 improper objections. As explained in *Brown & Weil*:

6 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
7 the responding party may serve objections. ... Objections must be specific. A motion
8 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
9 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
10 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
11 objections; and ¶8:1920]”
12 *Id.* at 8:1071.

13 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
14 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
15 therefore supported by good cause. This request is specifically tailored to obtain information that is
16 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
17 him. Therefore, a proper response should be compelled.

18 **SPECIAL INTERROGATORY NO. 30:**

19 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 12
20 of YOUR Complaint that PIERATTINI allegedly “has hidden behind a false identity for many
21 years”.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 30:**

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

28 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 30**

SHOULD BE COMPELLED:

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

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

6 Plaintiff has not provided a responsive answer, and there is no indication in the response that
7 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

8 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
9 improper objections. As explained in *Brown & Weil*:

10 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
11 the responding party may serve objections. ... Objections must be specific. A motion
12 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
13 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
14 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
15 objections; and ¶8:1920]”
16 *Id.* at 8:1071.

14 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
15 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
16 therefore supported by good cause. This request is specifically tailored to obtain information that is
17 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
18 him. Therefore, a proper response should be compelled.

19 **SPECIAL INTERROGATORY NO. 31:**

20 State all facts that support YOUR position in Paragraph 12 of YOUR Complaint that
21 PIERATTINI allegedly runs a “troll channel” on YouTube where he harasses people.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 31:**

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

28 ///

1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 31**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶[8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
25 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
26 therefore supported by good cause. This request is specifically tailored to obtain information that is
27 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
28 him. Therefore, a proper response should be compelled.

29 **SPECIAL INTERROGATORY NO. 32:**

30 IDENTIFY all WITNESSES that support YOUR position in Paragraph 12 of YOUR
31 Complaint that PIERATTINI allegedly runs a “troll channel” on YouTube where he harasses
32 people.

33 **RESPONSE TO SPECIAL INTERROGATORY NO. 32:**

34 Plaintiff objects in part on the following grounds: 1) Premature contention as Plaintiff has
35 not concluded discovery to determine all of the witnesses; 2) Equally (or more) available to

1 Pierattini as he is the one that knows who was there when he harmed Plaintiff; 3) Lack of personal
2 knowledge; 4) Not self-contained, refers to the complaint.

3 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 32**

4 **SHOULD BE COMPELLED:**

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

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

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

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

11 Plaintiff has not provided a responsive answer, and there is no indication in the response that
12 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

13 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
14 improper objections. As explained in *Brown & Weil*:

15 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
16 the responding party may serve objections. ... Objections must be specific. A motion
17 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
18 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
19 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
20 objections; and ¶[8:1920]”
21 *Id.* at 8:1071.

19 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
20 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
21 therefore supported by good cause. This request is specifically tailored to obtain information that is
22 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
23 him. Therefore, a proper response should be compelled.

24 **SPECIAL INTERROGATORY NO. 33:**

25 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 12
26 of YOUR Complaint that PIERATTINI allegedly runs a “troll channel” on YouTube where he
27 harasses people.

28 ///

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 33:**

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

7 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 33**

8 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶[8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. This request is specifically tailored to obtain information that is
32 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
33 him. Therefore, a proper response should be compelled.

34 ///

1 **SPECIAL INTERROGATORY NO. 34:**

2 State all facts that support YOUR position in Paragraph 12 of YOUR Complaint that
3 PIERATTINI allegedly pretends to be a private investigator.

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 34:**

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

10 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 34**

11 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. This request is specifically tailored to obtain information that is

1 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
2 him. Therefore, a proper response should be compelled.

3 **SPECIAL INTERROGATORY NO. 35:**

4 IDENTIFY all WITNESSES that support YOUR position in Paragraph 12 of YOUR
5 Complaint that PIERATTINI allegedly pretends to be a private investigator.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 35:**

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

11 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 35**
12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶[8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
28 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is

1 therefore supported by good cause. This request is specifically tailored to obtain information that is
2 essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against
3 him. Therefore, a proper response should be compelled.

4 **SPECIAL INTERROGATORY NO. 36:**

5 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 12
6 of YOUR Complaint that PIERATTINI allegedly pretends to be a private investigator.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 36:**

8 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 36**

12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶[8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
28 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is

1 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
2 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
3 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
4 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
5 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
6 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
7 response should be compelled.

8 **SPECIAL INTERROGATORY NO. 37:**

9 State all facts that support YOUR position in Paragraph 12 of YOUR Complaint that
10 PIERATTINI allegedly pretends to be a military police officer.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 37:**

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

15 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 37**

16 **SHOULD BE COMPELLED:**

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

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

23 Plaintiff has not provided a responsive answer, and there is no indication in the response that
24 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

25 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
26 improper objections. As explained in Brown & Weil:

27 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
28 the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*

1 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
2 objections; and ¶8:1920”
3 *Id.* at 8:1071.

4 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
5 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
6 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
7 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
8 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
9 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
10 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
11 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
12 response should be compelled.

12 **SPECIAL INTERROGATORY NO. 38:**

13 IDENTIFY all WITNESSES that support YOUR position in Paragraph 12 of YOUR
14 Complaint that PIERATTINI allegedly pretends to be a military police officer.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 38:**

16 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 38**

20 **SHOULD BE COMPELLED:**

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

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

29 Plaintiff has not provided a responsive answer, and there is no indication in the response that
30 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

1 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
2 improper objections. As explained in *Brown & Weil*:

3 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
4 the responding party may serve objections. ... Objections must be specific. A motion
5 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
6 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
7 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
8 objections; and ¶8:1920]”
9 *Id.* at 8:1071.

10 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
11 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
12 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
13 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
14 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
15 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
16 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
17 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
18 response should be compelled.

19 **SPECIAL INTERROGATORY NO. 39:**

20 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 12
21 of YOUR Complaint that PIERATTINI allegedly pretends to be a military police officer.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 39:**

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

26 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 39**

27 **SHOULD BE COMPELLED:**

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

- a) Each answer in a response to interrogatories shall be as complete and straightforward as the information reasonably available to the responding party permits.
- (b) If an interrogatory cannot be answered completely, it shall be answered to the extent possible.

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

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

6 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
7 improper objections. As explained in *Brown & Weil*:

8 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
9 the responding party may serve objections. ... Objections must be specific. A motion
10 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
11 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 40:**

22 State all facts that support YOUR position in Paragraph 19 of YOUR Complaint that YOU
23 previously enjoyed a good reputation in the community.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 40:**

25 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 ///

1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 40**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶[8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
25 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
26 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
27 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
28 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

29 **SPECIAL INTERROGATORY NO. 41:**

30 IDENTIFY all WITNESSES that support YOUR position in Paragraph 19 of YOUR
31 Complaint that YOU previously enjoyed a good reputation in the community.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 41:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 41**

6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting

///

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 42:**

4 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 19
5 of YOUR Complaint that YOU previously enjoyed a good reputation in the community.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 42:**

7 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 42**

11 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶[8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil

1 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
2 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
3 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
4 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
5 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
6 response should be compelled.

7 **SPECIAL INTERROGATORY NO. 43:**

8 State each statement allegedly made by PIERATTINI about YOU that YOU contend was
9 false.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 43:**

11 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 43**

15 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”

1 objections; and ¶[8:1920]”
2 *Id.* at 8:1071.

3 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
4 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
5 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
6 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
7 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
8 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
9 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
10 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
11 response should be compelled.

12 **SPECIAL INTERROGATORY NO. 44:**

13 State all facts that support YOUR position in Paragraph 20 of YOUR Complaint that
14 statements allegedly made by PIERATTINI in the video constitute slander per se in that they use
15 “inaccurate documents acquired from BeenVerified (in violation of their Terms of Service, partly
16 because of known accuracy issues)” to assert that YOU were convicted of a crime YOU allegedly
17 did not commit.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 44:**

19 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 44**

23 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 45:**

22 IDENTIFY all WITNESSES that support YOUR position in Paragraph 20 of YOUR
23 Complaint that statements allegedly made by PIERATTINI in the video constitute slander per se in
24 that they use “inaccurate documents acquired from BeenVerified (in violation of their Terms of
25 Service, partly because of known accuracy issues)” to assert that YOU were convicted of a crime
26 YOU allegedly did not commit.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 45:**

28 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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.

///
///

1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 45**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶[8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
25 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
26 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
27 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
28 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

29 **SPECIAL INTERROGATORY NO. 46:**

30 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 20
31 of YOUR Complaint that statements allegedly made by PIERATTINI in the video constitute slander

1 per se in that they use “inaccurate documents acquired from BeenVerified (in violation of their
2 Terms of Service, partly because of known accuracy issues)” to assert that YOU were convicted of a
3 crime YOU allegedly did not commit.

4 **RESPONSE TO SPECIAL INTERROGATORY NO. 46:**

5 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 46**

9 **SHOULD BE COMPELLED:**

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

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

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

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

20 Plaintiff has not provided a responsive answer, and there is no indication in the response that
21 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

22 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
23 improper objections. As explained in *Brown & Weil*:

24 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
25 the responding party may serve objections. ... Objections must be specific. A motion
26 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
27 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
28 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶[8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
32 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
33 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The

1 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
2 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
3 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
4 response should be compelled.

5 **SPECIAL INTERROGATORY NO. 47:**

6 State all facts that support YOUR position in Paragraph 20 of YOUR Complaint that YOU
7 were damaged by any alleged statements made by PIERATTINI.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 47:**

9 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 47**

13 **SHOULD BE COMPELLED:**

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

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

24 Plaintiff has not provided a responsive answer, and there is no indication in the response that
25 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

26 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
27 improper objections. As explained in Brown & Weil:

28 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

1 Plaintiff's objection has no specificity and does not state the specific grounds for objection. This
2 interrogatory is directly based on Plaintiff's allegations against Mr. Pierattini in the complaint and is
3 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
4 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
5 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
6 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
7 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
8 Pierattini's defenses against Plaintiff's unsubstantiated claims against him. Therefore, a proper
9 response should be compelled.

10 **SPECIAL INTERROGATORY NO. 48:**

11 IDENTIFY all WITNESSES that support YOUR position in Paragraph 20 of YOUR
12 Complaint that YOU were damaged by any alleged statements made by PIERATTINI.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 48:**

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

17 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 48**

18 **SHOULD BE COMPELLED:**

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

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

29 Plaintiff has not provided a responsive answer, and there is no indication in the response that
30 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

31 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
32 improper objections. As explained in Brown & Weil:

1 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
2 the responding party may serve objections. ... Objections must be specific. A motion
3 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
4 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
5 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
6 objections; and ¶8:1920]”
7 *Id.* at 8:1071.

8 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
9 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
10 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
11 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
12 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
13 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
14 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
15 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
16 response should be compelled.

17 **SPECIAL INTERROGATORY NO. 49:**

18 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 20
19 of YOUR Complaint that YOU were damaged by any alleged statements made by PIERATTINI.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 49:**

21 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 49**

25 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 50:**

22 State all facts that support YOUR position in Paragraph 21 of YOUR Complaint that any
23 alleged statements made by PIERATTINI were false.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 50:**

25 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 50**

SHOULD BE COMPELLED:

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

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

10 Plaintiff has not provided a responsive answer, and there is no indication in the response that
11 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

12 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
13 improper objections. As explained in *Brown & Weil*:

14 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
15 the responding party may serve objections. ... Objections must be specific. A motion
16 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
17 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
18 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
19 objections; and ¶8:1920]”
20 *Id.* at 8:1071.

21 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
22 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
23 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
24 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
25 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
26 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
27 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
28 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

SPECIAL INTERROGATORY NO. 51:

IDENTIFY all WITNESSES that support YOUR position in Paragraph 21 of YOUR
Complaint that any alleged statements made by PIERATTINI were false.

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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 51:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 51**

6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 52:**

4 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 21
5 of YOUR Complaint that any alleged statements made by PIERATTINI were false.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 52:**

7 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 52**

11 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil

1 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
2 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
3 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
4 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
5 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
6 response should be compelled.

7 **SPECIAL INTERROGATORY NO. 53:**

8 State all facts that support YOUR position in Paragraph 21 of YOUR Complaint that, as an
9 activist, YOU are often arrested, but have not been convicted.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 53:**

11 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 53**

15 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”

objections; and ¶[8:1920]”
Id. at 8:1071.

1
2 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
3 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
4 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
5 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
6 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
7 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
8 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
9 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
10 response should be compelled.

11 **SPECIAL INTERROGATORY NO. 54:**

12 IDENTIFY all WITNESSES that support YOUR position in Paragraph 21 of YOUR
13 Complaint that, as an activist, YOU are often arrested, but have not been convicted.

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 54:**

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

18 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 54**

19 **SHOULD BE COMPELLED:**

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

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

26 Plaintiff has not provided a responsive answer, and there is no indication in the response that
27 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

28 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of

1 improper objections. As explained in *Brown & Weil*:

2 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
3 the responding party may serve objections. ... Objections must be specific. A motion
4 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
5 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
6 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
7 objections; and ¶8:1920]”
8 *Id.* at 8:1071.

9 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
10 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
11 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
12 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
13 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
14 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
15 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
16 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
17 response should be compelled.

18 **SPECIAL INTERROGATORY NO. 55:**

19 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 21
20 of YOUR Complaint that, as an activist, YOU are often arrested, but have not been convicted.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 55:**

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

25 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 55**

26 **SHOULD BE COMPELLED:**

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

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

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

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

4 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
5 improper objections. As explained in *Brown & Weil*:

6 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
7 the responding party may serve objections. ... Objections must be specific. A motion
8 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
9 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
10 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
11 objections; and ¶[8:1920]”
12 *Id.* at 8:1071.

13 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
14 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
15 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
16 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
17 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
18 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
19 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
20 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
21 response should be compelled.

22 **SPECIAL INTERROGATORY NO. 56:**

23 State all facts that support YOUR position in Paragraph 23 of YOUR Complaint that YOU
24 allegedly suffered the following damages with respect to YOUR “property, business, trade
25 profession, or occupation: damages in the amount of approximately \$50,000 of compensatory
26 damages and special damages according to proof related to emotional distress.”

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 56:**

28 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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.

///
///

1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 56**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶[8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
25 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
26 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
27 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
28 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

29 **SPECIAL INTERROGATORY NO. 57:**

30 IDENTIFY all WITNESSES that support YOUR position in Paragraph 23 of YOUR
31 Complaint that YOU allegedly suffered the following damages with respect to YOUR “property,

1 business, trade profession, or occupation: damages in the amount of approximately \$50,000 of
2 compensatory damages and special damages according to proof related to emotional distress.”

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 57:**

4 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 57**

8 **SHOULD BE COMPELLED:**

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

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

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
30 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
31 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
32 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
33 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
34 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration

1 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
2 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
3 response should be compelled.

4 **SPECIAL INTERROGATORY NO. 58:**

5 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 23
6 of YOUR Complaint that YOU allegedly suffered the following damages with respect to YOUR
7 “property, business, trade profession, or occupation: damages in the amount of approximately
8 \$50,000 of compensatory damages and special damages according to proof related to emotional
9 distress.”

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 58:**

11 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 58**

15 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”

1 objections; and ¶[8:1920]”
2 *Id.* at 8:1071.

3 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
4 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
5 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
6 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
7 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
8 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
9 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
10 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
11 response should be compelled.

12 **SPECIAL INTERROGATORY NO. 59:**

13 State all facts that support YOUR position in Paragraph 24 of YOUR Complaint that
14 “statements were not privileged because they were published to YouTube and not to an internal
15 method between people with a shared interest.”

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 59:**

17 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 59**

21 **SHOULD BE COMPELLED:**

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

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

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

1 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
2 improper objections. As explained in *Brown & Weil*:

3 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
4 the responding party may serve objections. ... Objections must be specific. A motion
5 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
6 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
7 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
8 objections; and ¶8:1920]”
9 *Id.* at 8:1071.

10 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
11 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
12 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
13 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
14 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
15 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
16 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
17 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
18 response should be compelled.

19 **SPECIAL INTERROGATORY NO. 60:**

20 IDENTIFY all WITNESSES that support YOUR position in Paragraph 24 of YOUR
21 Complaint that “statements were not privileged because they were published to YouTube and not to
22 an internal method between people with a shared interest.”

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 60:**

24 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 60**

28 **SHOULD BE COMPELLED:**

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

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

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

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

8 Plaintiff has not provided a responsive answer, and there is no indication in the response that
9 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

10 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
11 improper objections. As explained in *Brown & Weil*:

12 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
13 the responding party may serve objections. ... Objections must be specific. A motion
14 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
15 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
16 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
17 objections; *and* ¶[8:1920]”
18 *Id.* at 8:1071.

19 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
20 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
21 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
22 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
23 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
24 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
25 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
26 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
27 response should be compelled.

28 **SPECIAL INTERROGATORY NO. 61:**

DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 24
of YOUR Complaint that “statements were not privileged because they were published to YouTube
and not to an internal method between people with a shared interest.”

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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 61:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 61**

6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper

1 response should be compelled.

2 **SPECIAL INTERROGATORY NO. 62:**

3 State all facts that support YOUR position in Paragraph 25 of YOUR Complaint that YOU
4 allegedly demanded a retraction within the statutory period and a retraction has not been published.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 62:**

6 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 62**

10 **SHOULD BE COMPELLED:**

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

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

21 Plaintiff has not provided a responsive answer, and there is no indication in the response that
22 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

23 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
24 improper objections. As explained in *Brown & Weil*:

25 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
26 the responding party may serve objections. ... Objections must be specific. A motion
27 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
28 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
32 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party

1 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
2 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
3 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
4 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
5 response should be compelled.

6 **SPECIAL INTERROGATORY NO. 63:**

7 IDENTIFY all WITNESSES that support YOUR position in Paragraph 25 of YOUR
8 Complaint that YOU allegedly demanded a retraction within the statutory period and a retraction has
9 not been published.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 63:**

11 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 63**

15 **SHOULD BE COMPELLED:**

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

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

26 Plaintiff has not provided a responsive answer, and there is no indication in the response that
27 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

28 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
improper objections. As explained in *Brown & Weil*:

“[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”

1 objections; and ¶[8:1920]”
2 *Id.* at 8:1071.

3 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
4 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
5 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
6 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
7 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
8 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
9 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
10 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
11 response should be compelled.

12 **SPECIAL INTERROGATORY NO. 64:**

13 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 25
14 of YOUR Complaint that YOU allegedly demanded a retraction within the statutory period and a
15 retraction has not been published.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 64:**

17 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 64**

21 **SHOULD BE COMPELLED:**

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

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

29 Plaintiff has not provided a responsive answer, and there is no indication in the response that
30 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

1 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
2 improper objections. As explained in *Brown & Weil*:

3 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
4 the responding party may serve objections. ... Objections must be specific. A motion
5 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
6 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
7 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
8 objections; and ¶8:1920]”
9 *Id.* at 8:1071.

10 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
11 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
12 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
13 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
14 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
15 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
16 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
17 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
18 response should be compelled.

19 **SPECIAL INTERROGATORY NO. 65:**

20 State all facts that support YOUR position in Paragraph 33 of YOUR Complaint that on
21 August 8, 2022, YOUR van was allegedly stolen from YOUR driveway by PIERATTINI.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 65:**

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

26 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 65**

27 **SHOULD BE COMPELLED:**

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

- a) Each answer in a response to interrogatories shall be as complete and straightforward as the information reasonably available to the responding party permits.
- (b) If an interrogatory cannot be answered completely, it shall be answered to the extent possible.

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

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

6 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
7 improper objections. As explained in *Brown & Weil*:

8 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
9 the responding party may serve objections. ... Objections must be specific. A motion
10 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.) (1997) 51 CA4th
11 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 66:**

22 IDENTIFY all WITNESSES that support YOUR position in Paragraph 33 of YOUR
23 Complaint that on August 8, 2022, YOUR van was allegedly stolen from YOUR driveway by
24 PIERATTINI.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 66:**

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

1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 66**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
25 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
26 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
27 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
28 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

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1 **SPECIAL INTERROGATORY NO. 67:**

2 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 33
3 of YOUR Complaint that on August 8, 2022, YOUR van was allegedly stolen from YOUR
4 driveway by PIERATTINI.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 67:**

6 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 67**

10 **SHOULD BE COMPELLED:**

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

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

21 Plaintiff has not provided a responsive answer, and there is no indication in the response that
22 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

23 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
24 improper objections. As explained in *Brown & Weil*:

25 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
26 the responding party may serve objections. ... Objections must be specific. A motion
27 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
28 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
30 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
31 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
32 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the

1 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
2 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
3 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
4 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
5 response should be compelled.

6 **SPECIAL INTERROGATORY NO. 68:**

7 State all facts that support YOUR position in Paragraph 39 of YOUR Complaint that YOU
8 are not a public figure or a limited public figure.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 68:**

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

13 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 68**

14 **SHOULD BE COMPELLED:**

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

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

21 Plaintiff has not provided a responsive answer, and there is no indication in the response that
22 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

23 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
24 improper objections. As explained in *Brown & Weil*:

25 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
26 the responding party may serve objections. ... Objections must be specific. A motion
27 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
28 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶[8:1920]”
Id. at 8:1071.

1 Plaintiff's objection has no specificity and does not state the specific grounds for objection. This
2 interrogatory is directly based on Plaintiff's allegations against Mr. Pierattini in the complaint and is
3 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
4 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
5 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
6 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
7 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
8 Pierattini's defenses against Plaintiff's unsubstantiated claims against him. Therefore, a proper
9 response should be compelled.

10 **SPECIAL INTERROGATORY NO. 69:**

11 IDENTIFY all WITNESSES that support YOUR position in Paragraph 39 of YOUR
12 Complaint that YOU are not a public figure or a limited public figure.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 69:**

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

17 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 69**

18 **SHOULD BE COMPELLED:**

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

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

29 Plaintiff has not provided a responsive answer, and there is no indication in the response that
30 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

31 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
32 improper objections. As explained in Brown & Weil:

1 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
2 the responding party may serve objections. ... Objections must be specific. A motion
3 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
4 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
5 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
6 objections; and ¶[8:1920]”
7 *Id.* at 8:1071.

8 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
9 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
10 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
11 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
12 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
13 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
14 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
15 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
16 response should be compelled.

17 **SPECIAL INTERROGATORY NO. 70:**

18 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 39
19 of YOUR Complaint that YOU are not a public figure or a limited public figure.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 70:**

21 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 70**

25 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
13 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
14 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
15 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
16 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 71:**

22 State all facts that support YOUR position in Paragraph 39 of YOUR Complaint that
23 Defendant Peter has allegedly recorded videos in contempt of court in a federal lawsuit.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 71:**

25 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 71**

SHOULD BE COMPELLED:

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

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

6 Plaintiff has not provided a responsive answer, and there is no indication in the response that
7 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

8 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
9 improper objections. As explained in *Brown & Weil*:

10 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
11 the responding party may serve objections. ... Objections must be specific. A motion
12 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
13 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
14 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
15 objections; and ¶8:1920]”
16 *Id.* at 8:1071.

14 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
15 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
16 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
17 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
18 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
19 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
20 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
21 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
22 response should be compelled.

23 **SPECIAL INTERROGATORY NO. 72:**

24 IDENTIFY all WITNESSES that support YOUR position in Paragraph 39 of YOUR
25 Complaint that Defendant Peter has allegedly recorded videos in contempt of court in a federal
26 lawsuit.

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28 ///

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 72:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 72**

6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 73:**

4 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 39
5 of YOUR Complaint that Defendant Peter has allegedly recorded videos in contempt of court in a
6 federal lawsuit.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 73:**

8 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 73**
12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
28 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint

1 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
2 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
3 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
4 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
5 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
6 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
7 response should be compelled.

8 **SPECIAL INTERROGATORY NO. 74:**

9 State all facts that support YOUR position in Paragraph 39 of YOUR Complaint that
10 Defendant Peter has allegedly made 70 videos totaling over 170 hours of content about YOU.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 74:**

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

15 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 74**

16 **SHOULD BE COMPELLED:**

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

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

23 Plaintiff has not provided a responsive answer, and there is no indication in the response that
24 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

25 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
26 improper objections. As explained in Brown & Weil:

27 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
28 the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*

1 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
2 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
3 objections; and ¶8:1920”
4 *Id.* at 8:1071.

5 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
6 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
7 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
8 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
9 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
10 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
11 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
12 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
13 response should be compelled.

14 **SPECIAL INTERROGATORY NO. 75:**

15 IDENTIFY all WITNESSES that support YOUR position in Paragraph 39 of YOUR
16 Complaint that Defendant Peter has allegedly made 70 videos totaling over 170 hours of content
17 about YOU.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 75:**

19 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 75**

23 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
13 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
14 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
15 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
16 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 76:**

22 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 39
23 of YOUR Complaint that Defendant Peter has allegedly made 70 videos totaling over 170 hours of
24 content about YOU.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 76:**

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

REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 76

SHOULD BE COMPELLED:

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

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

10 Plaintiff has not provided a responsive answer, and there is no indication in the response that
11 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

12 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
13 improper objections. As explained in *Brown & Weil*:

14 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
15 the responding party may serve objections. ... Objections must be specific. A motion
16 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
17 Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
18 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
19 objections; and ¶8:1920]”
20 *Id.* at 8:1071.

21 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
22 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
23 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
24 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
25 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
26 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
27 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
28 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

SPECIAL INTERROGATORY NO. 77:

State all facts that support YOUR position in Paragraph 39 of YOUR Complaint that
Defendant Peter’s videos seriously alarmed and annoyed YOU and allegedly caused YOU
substantial emotional distress and financial loss.

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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 77:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 77**

6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 78:**

4 IDENTIFY all WITNESSES that support YOUR position in Paragraph 39 of YOUR
5 Complaint that Defendant Peter’s videos seriously alarmed and annoyed YOU and allegedly caused
6 YOU substantial emotional distress and financial loss.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 78:**

8 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 78**
12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶[8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
28 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint

1 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
2 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
3 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
4 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
5 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
6 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
7 response should be compelled.

8 **SPECIAL INTERROGATORY NO. 79:**

9 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 39
10 of YOUR Complaint that Defendant Peter’s videos seriously alarmed and annoyed YOU and
11 allegedly caused YOU substantial emotional distress and financial loss.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 79:**

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

16 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 79**

17 **SHOULD BE COMPELLED:**

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

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

28 Plaintiff has not provided a responsive answer, and there is no indication in the response that
Plaintiff has made a reasonable and good faith effort to obtain the information requested.

Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
improper objections. As explained in Brown & Weil:

“[8:1071] Objections: In lieu of answering or allowing inspection of records, above,

1 the responding party may serve objections. ... Objections must be specific. A motion
2 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
3 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
4 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
5 objections; and ¶8:1920]”
6 *Id.* at 8:1071.

7 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
8 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
9 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
10 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
11 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
12 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
13 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
14 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
15 response should be compelled.

16 **SPECIAL INTERROGATORY NO. 80:**

17 State all facts that support YOUR position in Paragraph 40 of YOUR Complaint that on May
18 3, 2022, PIERATTINI allegedly called YOU while YOU were recording and broadcasting a video.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 80:**

20 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 80**

24 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 81:**

22 IDENTIFY all WITNESSES that support YOUR position in Paragraph 40 of YOUR
23 Complaint that on May 3, 2022, PIERATTINI allegedly called YOU while YOU were recording
24 and broadcasting a video.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 81:**

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

REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 81

SHOULD BE COMPELLED:

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

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

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

Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of improper objections. As explained in *Brown & Weil*:

“[8:1071] Objections: In lieu of answering or allowing inspection of records, above, the responding party may serve objections. ... Objections must be specific. A motion to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate” objections; and ¶[8:1920]”
Id. at 8:1071.

Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration attached. This request is specifically tailored to obtain information that is essential to supporting Mr. Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper response should be compelled.

SPECIAL INTERROGATORY NO. 82:

DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 40 of YOUR Complaint that on May 3, 2022, PIERATTINI allegedly called YOU while YOU were recording and broadcasting a video.

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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 82:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 82**
6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 83:**

4 State all facts that support YOUR position in Paragraph 40 of YOUR Complaint that
5 PIERATTINI was allegedly watching YOUR livestream and determined when it would be best to
6 harass YOU.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 83:**

8 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 83**
12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in Brown & Weil:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
28 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is

1 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
2 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
3 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
4 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
5 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
6 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
7 response should be compelled.

8 **SPECIAL INTERROGATORY NO. 84:**

9 IDENTIFY all WITNESSES that support YOUR position in Paragraph 40 of YOUR
10 Complaint that PIERATTINI was allegedly watching YOUR livestream and determined when it
11 would be best to harass YOU.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 84:**

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

16 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 84**

17 **SHOULD BE COMPELLED:**

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

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

24 Plaintiff has not provided a responsive answer, and there is no indication in the response that
25 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

26 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
27 improper objections. As explained in Brown & Weil:

28 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,

1 the responding party may serve objections. ... Objections must be specific. A motion
2 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
3 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
4 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
5 objections; and ¶8:1920]”
6 *Id.* at 8:1071.

7 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
8 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
9 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
10 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
11 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
12 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
13 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
14 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
15 response should be compelled.

16 **SPECIAL INTERROGATORY NO. 85:**

17 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 40
18 of YOUR Complaint that PIERATTINI was allegedly watching YOUR livestream and determined
19 when it would be best to harass YOU.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 85:**

21 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 85**

25 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
13 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
14 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
15 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
16 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 86:**

22 State all facts that support YOUR position in Paragraph 40 of YOUR Complaint that the
23 alleged repeated telephone calls and text messages impacted the fundraiser and “seriously annoyed
24 and harassed [YOUR] guest and [YOU].”

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 86:**

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

REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 86

SHOULD BE COMPELLED:

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

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

10 Plaintiff has not provided a responsive answer, and there is no indication in the response that
11 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

12 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
13 improper objections. As explained in *Brown & Weil*:

14 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
15 the responding party may serve objections. ... Objections must be specific. A motion
16 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
17 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
18 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
19 objections; and ¶8:1920]”
20 *Id.* at 8:1071.

21 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
22 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
23 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
24 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
25 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
26 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
27 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
28 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

SPECIAL INTERROGATORY NO. 87:

IDENTIFY all WITNESSES that support YOUR position in Paragraph 40 of YOUR
Complaint that the alleged repeated telephone calls and text messages impacted the fundraiser and
“seriously annoyed and harassed [YOUR] guest and [YOU].”

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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 87:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 87**

6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 88:**

4 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 40
5 of YOUR Complaint that the alleged repeated telephone calls and text messages impacted the
6 fundraiser and “seriously annoyed and harassed [YOUR] guest and [YOU].”

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 88:**

8 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 88**
12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
28 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint

1 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
2 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
3 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
4 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
5 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
6 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
7 response should be compelled.

8 **SPECIAL INTERROGATORY NO. 89:**

9 State all facts that support YOUR position in Paragraph 42 of YOUR Complaint that
10 PIERATTINI has allegedly repeatedly emailed, cyberstalked, stalked, harassed, and trespassed on
11 YOUR residence.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 89:**

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

16 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 89**

17 **SHOULD BE COMPELLED:**

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

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

28 Plaintiff has not provided a responsive answer, and there is no indication in the response that
Plaintiff has made a reasonable and good faith effort to obtain the information requested.

Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
improper objections. As explained in Brown & Weil:

“[8:1071] Objections: In lieu of answering or allowing inspection of records, above,

1 the responding party may serve objections. ... Objections must be specific. A motion
2 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
3 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
4 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
5 objections; and ¶8:1920]”
6 *Id.* at 8:1071.

7 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
8 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
9 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
10 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
11 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
12 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
13 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
14 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
15 response should be compelled.

16 **SPECIAL INTERROGATORY NO. 90:**

17 IDENTIFY all WITNESSES that support YOUR position in Paragraph 42 of YOUR
18 Complaint that PIERATTINI has allegedly repeatedly emailed, cyberstalked, stalked, harassed, and
19 trespassed on YOUR residence.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 90:**

21 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 90**

25 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
13 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
14 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
15 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
16 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 91:**

22 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 42
23 of YOUR Complaint that PIERATTINI has allegedly repeatedly emailed, cyberstalked, stalked,
24 harassed, and trespassed on YOUR residence.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 91:**

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

REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 91

SHOULD BE COMPELLED:

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

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

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

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

10 Plaintiff has not provided a responsive answer, and there is no indication in the response that
11 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

12 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
13 improper objections. As explained in Brown & Weil:

14 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
15 the responding party may serve objections. ... Objections must be specific. A motion
16 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
17 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
18 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
19 objections; and ¶8:1920]”
20 *Id.* at 8:1071.

21 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
22 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
23 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
24 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
25 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
26 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
27 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
28 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

SPECIAL INTERROGATORY NO. 92:

State all facts that support YOUR position in Paragraph 42 of YOUR Complaint that
PIERATTINI has allegedly “[committed] wholesale copyright infringement” of YOUR creative
content in order to harass YOU.

///

///

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 92:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 92**

6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 93:**

4 IDENTIFY all WITNESSES that support YOUR position in Paragraph 42 of YOUR
5 Complaint that PIERATTINI has allegedly “[committed] wholesale copyright infringement” of
6 YOUR creative content in order to harass YOU.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 93:**

8 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 93**
12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶[8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
28 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is

1 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
2 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
3 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
4 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
5 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
6 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
7 response should be compelled.

8 **SPECIAL INTERROGATORY NO. 94:**

9 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 42
10 of YOUR Complaint that PIERATTINI has allegedly “[committed] wholesale copyright
11 infringement” of YOUR creative content in order to harass YOU.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 94:**

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

16 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 94**

17 **SHOULD BE COMPELLED:**

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

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

24 Plaintiff has not provided a responsive answer, and there is no indication in the response that
25 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

26 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
27 improper objections. As explained in Brown & Weil:

28 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,

1 the responding party may serve objections. ... Objections must be specific. A motion
2 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
3 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
4 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
5 objections; and ¶8:1920]”
6 *Id.* at 8:1071.

7 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
8 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
9 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
10 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
11 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
12 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
13 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
14 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
15 response should be compelled.

16 **SPECIAL INTERROGATORY NO. 95:**

17 State all facts that support YOUR position in Paragraph 42 of YOUR Complaint that YOU
18 have a pending federal lawsuit over the alleged “wholesale copyright infringement”.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 95:**

20 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO.95**

24 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 96:**

22 IDENTIFY all WITNESSES that support YOUR position in Paragraph 42 of YOUR
23 Complaint that YOU have a pending federal lawsuit over the alleged “wholesale copyright
24 infringement”.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 96:**

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

REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 96

SHOULD BE COMPELLED:

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

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

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

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

10 Plaintiff has not provided a responsive answer, and there is no indication in the response that
11 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

12 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
13 improper objections. As explained in *Brown & Weil*:

14 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
15 the responding party may serve objections. ... Objections must be specific. A motion
16 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
17 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
18 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
19 objections; and ¶8:1920]”
20 *Id.* at 8:1071.

21 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
22 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
23 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
24 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
25 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
26 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
27 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
28 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

SPECIAL INTERROGATORY NO. 97:

DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 42
of YOUR Complaint that YOU have a pending federal lawsuit over the alleged “wholesale
copyright infringement”.

///

///

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 97:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 97**

6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 98:**

4 State all facts that support YOUR position in Paragraph 42 of YOUR Complaint that
5 PIERATTINI allegedly harassed YOUR dog.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 98:**

7 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 98**

11 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil

1 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
2 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
3 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
4 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
5 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
6 response should be compelled.

7 **SPECIAL INTERROGATORY NO. 99:**

8 IDENTIFY all WITNESSES that support YOUR position in Paragraph 42 of YOUR
9 Complaint that PIERATTINI allegedly harassed YOUR dog.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 99:**

11 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 99**

15 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in Brown & Weil:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”

1 objections; and ¶[8:1920]”
2 *Id.* at 8:1071.

3 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
4 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
5 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
6 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
7 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
8 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
9 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
10 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
11 response should be compelled.

12 **SPECIAL INTERROGATORY NO. 100:**

13 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 42
14 of YOUR Complaint that PIERATTINI allegedly harassed YOUR dog.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 100:**

16 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 100**

20 **SHOULD BE COMPELLED:**

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

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

29 Plaintiff has not provided a responsive answer, and there is no indication in the response that
30 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

31 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of

1 improper objections. As explained in *Brown & Weil*:

2 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
3 the responding party may serve objections. ... Objections must be specific. A motion
4 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
5 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
6 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
7 objections; and ¶8:1920]”
8 *Id.* at 8:1071.

9 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
10 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
11 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
12 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
13 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
14 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
15 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
16 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
17 response should be compelled.

18 **SPECIAL INTERROGATORY NO. 101:**

19 State all facts that support YOUR position in Paragraph 42 of YOUR Complaint that
20 PIERATTINI has refused to honor any alleged harassment cease requests or demands.

21 **RESPONSE TO SPECIAL INTERROGATORY NO. 101:**

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

25 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 101**

26 **SHOULD BE COMPELLED:**

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

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

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

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

4 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
5 improper objections. As explained in *Brown & Weil*:

6 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
7 the responding party may serve objections. ... Objections must be specific. A motion
8 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
9 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
10 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
11 objections; and ¶[8:1920]”
12 *Id.* at 8:1071.

13 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
14 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
15 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
16 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
17 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
18 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
19 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
20 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
21 response should be compelled.

22 **SPECIAL INTERROGATORY NO. 102:**

23 IDENTIFY all WITNESSES that support YOUR position in Paragraph 42 of YOUR
24 Complaint that PIERATTINI has refused to honor any alleged harassment cease requests or
25 demands.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 102:**

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

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1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 102**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶[8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
25 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
26 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
27 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
28 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

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1 **SPECIAL INTERROGATORY NO. 103:**

2 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 42
3 of YOUR Complaint that PIERATTINI has refused to honor any alleged harassment cease requests
4 or demands.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 103:**

6 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 103**

10 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶8:1920]”
27 *Id.* at 8:1071.

25 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
26 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
27 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
28 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the

1 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
2 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
3 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
4 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
5 response should be compelled.

6 **SPECIAL INTERROGATORY NO. 104:**

7 State all facts that support YOUR contention in Paragraph 43 of YOUR Complaint that
8 PIERATTINI is allegedly involved in a conspiracy concerning YOU.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 104:**

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

13 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 104**

14 **SHOULD BE COMPELLED:**

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

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

21 Plaintiff has not provided a responsive answer, and there is no indication in the response that
22 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

23 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
24 improper objections. As explained in *Brown & Weil*:

25 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
26 the responding party may serve objections. ... Objections must be specific. A motion
27 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
28 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

1 Plaintiff's objection has no specificity and does not state the specific grounds for objection. This
2 interrogatory is directly based on Plaintiff's allegations against Mr. Pierattini in the complaint and is
3 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
4 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
5 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
6 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
7 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
8 Pierattini's defenses against Plaintiff's unsubstantiated claims against him. Therefore, a proper
9 response should be compelled.

10 **SPECIAL INTERROGATORY NO. 105:**

11 IDENTIFY all WITNESSES that support YOUR contention in Paragraph 43 of YOUR
12 Complaint that PIERATTINI is allegedly involved in a conspiracy concerning YOU.

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 105:**

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

17 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 105**

18 **SHOULD BE COMPELLED:**

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

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

29 Plaintiff has not provided a responsive answer, and there is no indication in the response that
30 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

31 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
32 improper objections. As explained in Brown & Weil:

1 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
2 the responding party may serve objections. ... Objections must be specific. A motion
3 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
4 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
5 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
6 objections; and ¶[8:1920]”
7 *Id.* at 8:1071.

8 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
9 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
10 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
11 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
12 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
13 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
14 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
15 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
16 response should be compelled.

17 **SPECIAL INTERROGATORY NO. 106:**

18 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR contention in Paragraph
19 43 of YOUR Complaint that PIERATTINI is allegedly involved in a conspiracy concerning YOU.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 106:**

21 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 106**

25 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 107:**

22 State all facts that support YOUR position in Paragraph 43 of YOUR position in Paragraph
23 43 of YOUR Complaint that PIERATTINI allegedly entered into an agreement to commit wrongful
24 acts against YOU.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 107:**

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

REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 107

SHOULD BE COMPELLED:

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

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

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

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

10 Plaintiff has not provided a responsive answer, and there is no indication in the response that
11 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

12 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
13 improper objections. As explained in *Brown & Weil*:

14 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
15 the responding party may serve objections. ... Objections must be specific. A motion
16 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
17 Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
18 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
19 objections; and ¶8:1920]”
20 *Id.* at 8:1071.

21 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
22 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
23 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
24 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
25 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
26 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
27 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
28 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

SPECIAL INTERROGATORY NO. 108:

IDENTIFY all WITNESSES that support YOUR position in Paragraph 43 of YOUR
Complaint that PIERATTINI allegedly entered into an agreement to commit wrongful acts against
YOU.

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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 108:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 108**

6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 109:**

4 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 43
5 of YOUR Complaint that PIERATTINI allegedly entered into an agreement to commit wrongful
6 acts against YOU.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 109:**

8 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 109**
12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
28 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is

1 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
2 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
3 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
4 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
5 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
6 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
7 response should be compelled.

8 **SPECIAL INTERROGATORY NO. 110:**

9 State all facts that support YOUR position in Paragraph 47 of YOUR Complaint that
10 PIERATTINI allegedly wrote in the Discord account and directly emailed YOU that he planted an
11 Apple AirTag in and/or on YOUR vehicle.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 110:**

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

16 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 110**

17 **SHOULD BE COMPELLED:**

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

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

28 Plaintiff has not provided a responsive answer, and there is no indication in the response that
Plaintiff has made a reasonable and good faith effort to obtain the information requested.

Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
improper objections. As explained in Brown & Weil:

“[8:1071] Objections: In lieu of answering or allowing inspection of records, above,

1 the responding party may serve objections. ... Objections must be specific. A motion
2 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
3 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
4 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
5 objections; and ¶8:1920]”
6 *Id.* at 8:1071.

7 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
8 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
9 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
10 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
11 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
12 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
13 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
14 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
15 response should be compelled.

16 **SPECIAL INTERROGATORY NO. 111:**

17 IDENTIFY all WITNESSES that support YOUR position in Paragraph 47 of YOUR
18 Complaint that PIERATTINI allegedly wrote in the Discord account and directly emailed YOU that
19 he planted an Apple AirTag in and/or on YOUR vehicle.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 111:**

21 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 111**

25 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in Brown & Weil:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
13 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
14 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
15 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
16 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 112:**

22 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 47
23 of YOUR Complaint that PIERATTINI allegedly wrote in the Discord account and directly emailed
24 YOU that he planted an Apple AirTag in and/or on YOUR vehicle.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 112:**

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

REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 112

SHOULD BE COMPELLED:

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

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

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

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

10 Plaintiff has not provided a responsive answer, and there is no indication in the response that
11 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

12 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
13 improper objections. As explained in *Brown & Weil*:

14 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
15 the responding party may serve objections. ... Objections must be specific. A motion
16 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
17 Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
18 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
19 objections; and ¶8:1920]”
20 *Id.* at 8:1071.

21 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
22 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
23 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
24 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
25 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
26 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
27 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
28 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

SPECIAL INTERROGATORY NO. 113:

State all facts that support YOUR position in Paragraph 48 of YOUR Complaint that
PIERATTINI allegedly wrote and stated in Defendant Peter’s videos that he is actively tracking
YOU like an “endangered great white [shark]” or “extinct megalodon”.

///
///
///

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 113:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 113**
6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 114:**

4 IDENTIFY all WITNESSES that support YOUR position in Paragraph 48 of YOUR
5 Complaint that PIERATTINI allegedly wrote and stated in Defendant Peter’s videos that he is
6 actively tracking YOU like an “endangered great white [shark]” or “extinct megalodon”.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 114:**

8 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 114**
12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
28 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint

1 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
2 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
3 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
4 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
5 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
6 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
7 response should be compelled.

8 **SPECIAL INTERROGATORY NO. 115:**

9 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 48
10 of YOUR Complaint that PIERATTINI allegedly wrote and stated in Defendant Peter’s videos that
11 he is actively tracking YOU like an “endangered great white [shark]” or “extinct megalodon”.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 115:**

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

16 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 115**

17 **SHOULD BE COMPELLED:**

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

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

28 Plaintiff has not provided a responsive answer, and there is no indication in the response that
Plaintiff has made a reasonable and good faith effort to obtain the information requested.

Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
improper objections. As explained in Brown & Weil:

“[8:1071] Objections: In lieu of answering or allowing inspection of records, above,

1 the responding party may serve objections. ... Objections must be specific. A motion
2 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
3 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
4 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
5 objections; and ¶8:1920]”
6 *Id.* at 8:1071.

7 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
8 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
9 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
10 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
11 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
12 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
13 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
14 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
15 response should be compelled.

16 **SPECIAL INTERROGATORY NO. 116:**

17 State all facts that support YOUR position in Paragraph 48 of YOUR Complaint that on
18 February 3, 2023, PIERATTINI allegedly posted YOUR exact location in the “Live Chat” of
19 YOUR live stream.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 116:**

21 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 116**

25 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 117:**

22 IDENTIFY all WITNESSES that support YOUR position in Paragraph 48 of YOUR
23 Complaint that on February 3, 2023, PIERATTINI allegedly posted YOUR exact location in the
24 “Live Chat” of YOUR live stream.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 117:**

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

REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 117

SHOULD BE COMPELLED:

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

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 118:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 118**
6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper

1 response should be compelled.

2 **SPECIAL INTERROGATORY NO. 119:**

3 State all facts that support YOUR position in Paragraph 48 of YOUR Complaint that
4 PIERATTINI allegedly created a fake username in the name of YOUR friend who you were staying
5 with.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 119:**

7 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 119**

11 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil

1 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
2 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
3 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
4 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
5 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
6 response should be compelled.

7 **SPECIAL INTERROGATORY NO. 120:**

8 IDENTIFY all WITNESSES that support YOUR position in Paragraph 48 of YOUR
9 Complaint that PIERATTINI allegedly created a fake username in the name of YOUR friend who
10 you were staying with.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 120:**

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

15 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 120**

16 **SHOULD BE COMPELLED:**

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

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

23 Plaintiff has not provided a responsive answer, and there is no indication in the response that
24 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

25 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
26 improper objections. As explained in Brown & Weil:

27 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
28 the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*

1 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
2 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
3 objections; *and ¶8:1920*”
4 *Id.* at 8:1071.

5 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
6 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
7 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
8 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
9 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
10 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
11 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
12 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
13 response should be compelled.

14 **SPECIAL INTERROGATORY NO. 121:**

15 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 48
16 of YOUR Complaint that PIERATTINI allegedly created a fake username in the name of YOUR
17 friend who you were staying with.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 121:**

19 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 121**

23 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in Brown & Weil:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 122:**

22 State all facts that support YOUR position in Paragraph 48 of YOUR Complaint that YOU
23 informed YOUR friend that PIERATTINI had allegedly used YOUR friend’s name as a “YouTube
24 username” and YOUR friend immediately stated his concern for YOUR and his safety.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 122:**

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

REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 122

SHOULD BE COMPELLED:

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

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

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

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

10 Plaintiff has not provided a responsive answer, and there is no indication in the response that
11 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

12 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
13 improper objections. As explained in *Brown & Weil*:

14 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
15 the responding party may serve objections. ... Objections must be specific. A motion
16 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
17 Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
18 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
19 objections; and ¶8:1920]”
20 *Id.* at 8:1071.

21 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
22 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
23 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
24 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
25 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
26 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
27 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
28 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

SPECIAL INTERROGATORY NO. 123:

IDENTIFY all WITNESSES that support YOUR position in Paragraph 48 of YOUR
Complaint that YOU informed YOUR friend that PIERATTINI had allegedly used YOUR friend’s
name as a “YouTube username” and YOUR friend immediately stated his concern for YOUR and
his safety.

///

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 123:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 123**
6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 124:**

4 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 48
5 of YOUR Complaint that YOU informed YOUR friend that PIERATTINI had allegedly used
6 YOUR friend’s name as a “YouTube username” and YOUR friend immediately stated his concern
7 for YOUR and his safety.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 124:**

9 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 124**

13 **SHOULD BE COMPELLED:**

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

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

24 Plaintiff has not provided a responsive answer, and there is no indication in the response that
25 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

26 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
27 improper objections. As explained in Brown & Weil:

28 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

1 Plaintiff's objection has no specificity and does not state the specific grounds for objection. This
2 interrogatory is directly based on Plaintiff's allegations against Mr. Pierattini in the complaint and is
3 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
4 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
5 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
6 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
7 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
8 Pierattini's defenses against Plaintiff's unsubstantiated claims against him. Therefore, a proper
9 response should be compelled.

10 **SPECIAL INTERROGATORY NO. 125:**

11 State all facts that support YOUR position in Paragraph 48 of YOUR Complaint that
12 PIERATTINI allegedly has "obvious, malicious intentions" to cause YOU and YOUR loved ones
13 fear and panic.

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 125:**

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

18 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 125**
19 **SHOULD BE COMPELLED:**

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

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

26 Plaintiff has not provided a responsive answer, and there is no indication in the response that
27 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

28 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of

1 improper objections. As explained in *Brown & Weil*:

2 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
3 the responding party may serve objections. ... Objections must be specific. A motion
4 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
5 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
6 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
7 objections; and ¶8:1920]”
8 *Id.* at 8:1071.

9 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
10 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
11 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
12 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
13 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
14 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
15 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
16 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
17 response should be compelled.

18 **SPECIAL INTERROGATORY NO. 126:**

19 IDENTIFY all WITNESSES that support YOUR position in Paragraph 48 of YOUR
20 Complaint that PIERATTINI allegedly has “obvious, malicious intentions” to cause YOU and
21 YOUR loved ones fear and panic.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 126:**

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

26 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 126**

27 **SHOULD BE COMPELLED:**

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

- a) Each answer in a response to interrogatories shall be as complete and straightforward as the information reasonably available to the responding party permits.
- (b) If an interrogatory cannot be answered completely, it shall be answered to the extent possible.

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

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

6 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
7 improper objections. As explained in *Brown & Weil*:

8 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
9 the responding party may serve objections. ... Objections must be specific. A motion
10 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.) (1997) 51 CA4th
11 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 127:**

22 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 48
23 of YOUR Complaint that PIERATTINI allegedly has “obvious, malicious intentions” to cause YOU
24 and YOUR loved ones fear and panic.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 127:**

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

1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 127**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶[8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
25 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
26 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
27 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
28 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

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1 **SPECIAL INTERROGATORY NO. 128:**

2 State all facts that support YOUR position in Paragraph 49 of YOUR Complaint that YOU
3 have allegedly been stalked and harassed at YOUR residences in New Hampshire, Boston, New
4 Mexico, Colorado, Nevada and California by PIERATTINI.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 128:**

6 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 128**

10 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

25 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
26 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
27 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
28 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party

1 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
2 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
3 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
4 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
5 response should be compelled.

6 **SPECIAL INTERROGATORY NO. 129:**

7 IDENTIFY all WITNESSES that support YOUR position in Paragraph 49 of YOUR
8 Complaint that YOU have allegedly been stalked and harassed at YOUR residences in New
9 Hampshire, Boston, New Mexico, Colorado, Nevada and California by PIERATTINI.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 129:**

11 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 129**
15 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.) (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”

objections; and ¶[8:1920]”
Id. at 8:1071.

1
2 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
3 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
4 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
5 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
6 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
7 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
8 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
9 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
10 response should be compelled.

11 **SPECIAL INTERROGATORY NO. 130:**

12 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 49
13 of YOUR Complaint that YOU have allegedly been stalked and harassed at YOUR residences in
14 New Hampshire, Boston, New Mexico, Colorado, Nevada and California by PIERATTINI.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 130:**

16 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 130**

20 **SHOULD BE COMPELLED:**

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

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

27 Plaintiff has not provided a responsive answer, and there is no indication in the response that
28 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

1 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
2 improper objections. As explained in *Brown & Weil*:

3 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
4 the responding party may serve objections. ... Objections must be specific. A motion
5 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
6 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
7 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
8 objections; and ¶8:1920]”
9 *Id.* at 8:1071.

10 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
11 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
12 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
13 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
14 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
15 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
16 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
17 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
18 response should be compelled.

19 **SPECIAL INTERROGATORY NO. 131:**

20 State all facts that support YOUR position in Paragraph 49 of YOUR Complaint that
21 PIERATTINI allegedly committed vandalism against YOUR property.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 131:**

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

26 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 131**

27 **SHOULD BE COMPELLED:**

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

- a) Each answer in a response to interrogatories shall be as complete and straightforward as the information reasonably available to the responding party permits.
- (b) If an interrogatory cannot be answered completely, it shall be answered to the extent possible.

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

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

6 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
7 improper objections. As explained in *Brown & Weil*:

8 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
9 the responding party may serve objections. ... Objections must be specific. A motion
10 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.) (1997) 51 CA4th
11 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 132:**

22 IDENTIFY all WITNESSES that support YOUR position in Paragraph 49 of YOUR
23 Complaint that PIERATTINI allegedly committed vandalism against YOUR property.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 132:**

25 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 ///

1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 132**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶[8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
25 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
26 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
27 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
28 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

29 **SPECIAL INTERROGATORY NO. 133:**

30 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 49
31 of YOUR Complaint that PIERATTINI allegedly committed vandalism against YOUR property.

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 133:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 133**

6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 134:**

4 State all facts that support YOUR position in Paragraph 50 of YOUR Complaint that
5 PIERATTINI is involved with an alleged Discord page called “chille-watch” where YOUR location
6 has been tracked.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 134:**

8 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 134**
12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in Brown & Weil:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
28 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is

1 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
2 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
3 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
4 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
5 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
6 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
7 response should be compelled.

8 **SPECIAL INTERROGATORY NO. 135:**

9 IDENTIFY all WITNESSES that support YOUR position in Paragraph 50 of YOUR
10 Complaint that PIERATTINI is involved with an alleged Discord page called “chille-watch” where
11 YOUR location has been tracked.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 135:**

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

16 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 135**

17 **SHOULD BE COMPELLED:**

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

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

24 Plaintiff has not provided a responsive answer, and there is no indication in the response that
25 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

26 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
27 improper objections. As explained in Brown & Weil:

28 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,

1 the responding party may serve objections. ... Objections must be specific. A motion
2 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
3 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
4 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
5 objections; and ¶8:1920]”
6 *Id.* at 8:1071.

7 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
8 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
9 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
10 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
11 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
12 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
13 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
14 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
15 response should be compelled.

16 **SPECIAL INTERROGATORY NO. 136:**

17 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 50
18 of YOUR Complaint that PIERATTINI is involved with an alleged Discord page called “chille-
19 watch” where YOUR location has been tracked.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 136:**

21 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 136**

25 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
13 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
14 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
15 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
16 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 137:**

22 State all facts that support YOUR position in Paragraph 50 of YOUR Complaint that YOU
23 have allegedly been stalked since June of 2022 by PIERATTINI.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 137:**

25 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 137**

SHOULD BE COMPELLED:

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

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

10 Plaintiff has not provided a responsive answer, and there is no indication in the response that
11 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

12 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
13 improper objections. As explained in *Brown & Weil*:

14 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
15 the responding party may serve objections. ... Objections must be specific. A motion
16 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
17 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
18 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
19 objections; and ¶8:1920]”
20 *Id.* at 8:1071.

21 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
22 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
23 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
24 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
25 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
26 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
27 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
28 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

SPECIAL INTERROGATORY NO. 138:

IDENTIFY all WITNESSES that support YOUR position in Paragraph 50 of YOUR
Complaint that YOU have allegedly been stalked since June of 2022 by PIERATTINI.

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///
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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 138:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 138**

6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper

1 response should be compelled.

2 **SPECIAL INTERROGATORY NO. 139:**

3 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 50
4 of YOUR Complaint that YOU have allegedly been stalked since June of 2022 by PIERATTINI.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 139:**

6 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 139**

10 **SHOULD BE COMPELLED:**

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

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

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

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

21 Plaintiff has not provided a responsive answer, and there is no indication in the response that
22 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

23 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
24 improper objections. As explained in *Brown & Weil*:

25 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
26 the responding party may serve objections. ... Objections must be specific. A motion
27 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
28 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
30 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
31 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
32 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the

1 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
2 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
3 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
4 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
5 response should be compelled.

6 **SPECIAL INTERROGATORY NO. 140:**

7 State all facts that support YOUR position in Paragraph 51 of YOUR Complaint that
8 PIERATTINI allegedly called the gas station attendant at a gas station at which YOU were filling
9 gas in YOUR car.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 140:**

11 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 140**
15 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”

objections; and ¶[8:1920]”
Id. at 8:1071.

1
2 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
3 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
4 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
5 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
6 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
7 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
8 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
9 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
10 response should be compelled.

11 **SPECIAL INTERROGATORY NO. 141:**

12 IDENTIFY all WITNESSES that support YOUR position in Paragraph 51 of YOUR
13 Complaint that PIERATTINI allegedly called the gas station attendant at a gas station at which
14 YOU were filling gas in YOUR car.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 141:**

16 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 141**

20 **SHOULD BE COMPELLED:**

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

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

29 Plaintiff has not provided a responsive answer, and there is no indication in the response that
30 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

1 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
2 improper objections. As explained in *Brown & Weil*:

3 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
4 the responding party may serve objections. ... Objections must be specific. A motion
5 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
6 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
7 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
8 objections; and ¶8:1920]”
9 *Id.* at 8:1071.

10 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
11 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
12 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
13 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
14 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
15 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
16 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
17 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
18 response should be compelled.

19 **SPECIAL INTERROGATORY NO. 142:**

20 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 51
21 of YOUR Complaint that PIERATTINI allegedly called the gas station attendant at a gas station at
22 which YOU were filling gas in YOUR car.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 142:**

24 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 142**

28 **SHOULD BE COMPELLED:**

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

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

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 143:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 143**

6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 144:**

4 IDENTIFY all WITNESSES that support YOUR position in Paragraph 51 of YOUR
5 Complaint that the hosts of accommodations YOU have stayed at while traveling have allegedly
6 been contacted by telephone, email, and messages through Airbnb by PIERATTINI.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 144:**

8 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 144**
12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
28 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is

1 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
2 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
3 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
4 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
5 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
6 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
7 response should be compelled.

8 **SPECIAL INTERROGATORY NO. 145:**

9 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 51
10 of YOUR Complaint that the hosts of accommodations YOU have stayed at while traveling have
11 allegedly been contacted by telephone, email, and messages through Airbnb by PIERATTINI.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 145:**

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

16 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 145**

17 **SHOULD BE COMPELLED:**

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

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

28 Plaintiff has not provided a responsive answer, and there is no indication in the response that
Plaintiff has made a reasonable and good faith effort to obtain the information requested.

Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
improper objections. As explained in Brown & Weil:

“[8:1071] Objections: In lieu of answering or allowing inspection of records, above,

1 the responding party may serve objections. ... Objections must be specific. A motion
2 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
3 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
4 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
5 objections; and ¶8:1920]”
6 *Id.* at 8:1071.

7 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
8 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
9 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
10 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
11 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
12 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
13 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
14 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
15 response should be compelled.

16 **SPECIAL INTERROGATORY NO. 146:**

17 State all facts that support YOUR position in Paragraph 51 of YOUR Complaint that
18 PIERATTINI allegedly said to YOUR Airbnb hosts “Did you know that DeCastro is a dangerous
19 man who carries guns and is wanted by the police in multiple states?”

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 146:**

21 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 146**

25 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 147:**

22 IDENTIFY all WITNESSES that support YOUR position in Paragraph 51 of YOUR
23 Complaint that PIERATTINI allegedly said to YOUR Airbnb hosts “Did you know that DeCastro is
24 a dangerous man who carries guns and is wanted by the police in multiple states”.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 147:**

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

REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 147

SHOULD BE COMPELLED:

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

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

10 Plaintiff has not provided a responsive answer, and there is no indication in the response that
11 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

12 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
13 improper objections. As explained in *Brown & Weil*:

14 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
15 the responding party may serve objections. ... Objections must be specific. A motion
16 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
17 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
18 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
19 objections; and ¶8:1920]”
20 *Id.* at 8:1071.

21 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
22 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
23 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
24 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
25 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
26 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
27 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
28 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

SPECIAL INTERROGATORY NO. 148:

DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 51
of YOUR Complaint that PIERATTINI allegedly said to YOUR Airbnb hosts “Did you know that
DeCastro is a dangerous man who carries guns and is wanted by the police in multiple states”.

///
///

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 148:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 148**
6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 149:**

4 State all facts that support YOUR position in Paragraph 52 of YOUR Complaint that
5 PIERATTINI had anything to do with your gym membership allegedly being cancelled.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 149:**

7 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 149**

11 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil

1 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
2 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
3 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
4 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
5 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
6 response should be compelled.

7 **SPECIAL INTERROGATORY NO. 150:**

8 IDENTIFY all WITNESSES that support YOUR position in Paragraph 52 of YOUR
9 Complaint that PIERATTINI had anything to do with your gym membership allegedly being
10 cancelled.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 150:**

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

15 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 150**

16 **SHOULD BE COMPELLED:**

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

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

27 Plaintiff has not provided a responsive answer, and there is no indication in the response that
28 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
improper objections. As explained in Brown & Weil:

“[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*

1 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
2 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
3 objections; *and ¶8:1920*”
4 *Id.* at 8:1071.

5 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
6 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
7 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
8 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
9 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
10 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
11 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
12 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
13 response should be compelled.

14 **SPECIAL INTERROGATORY NO. 151:**

15 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 52
16 of YOUR Complaint that PIERATTINI had anything to do with your gym membership allegedly
17 being cancelled.

18 **RESPONSE TO SPECIAL INTERROGATORY NO. 151:**

19 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 151**

23 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 152:**

22 State all facts that support YOUR position in Paragraph 52 of YOUR Complaint that
23 PIERATTINI allegedly harassed YOUR gym-owning friend.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 152:**

25 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 152**

SHOULD BE COMPELLED:

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

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

10 Plaintiff has not provided a responsive answer, and there is no indication in the response that
11 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

12 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
13 improper objections. As explained in *Brown & Weil*:

14 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
15 the responding party may serve objections. ... Objections must be specific. A motion
16 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
17 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
18 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
19 objections; and ¶8:1920]”
20 *Id.* at 8:1071.

21 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
22 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
23 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
24 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
25 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
26 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
27 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
28 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

SPECIAL INTERROGATORY NO. 153:

IDENTIFY all WITNESSES that support YOUR position in Paragraph 52 of YOUR
Complaint that PIERATTINI allegedly harassed YOUR gym-owning friend.

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1 **RESPONSE TO SPECIAL INTERROGATORY NO. 153:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 153**
6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 154:**

4 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 52
5 of YOUR Complaint that PIERATTINI allegedly harassed YOUR gym-owning friend.

6 **RESPONSE TO SPECIAL INTERROGATORY NO. 154:**

7 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 154**

11 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
30 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
31 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of

1 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
2 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
3 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
4 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
5 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
6 response should be compelled.

7 **SPECIAL INTERROGATORY NO. 155:**

8 State all facts that support YOUR position in Paragraph 53 of YOUR Complaint that
9 PIERATTINI had anything to do with the alleged suspension of your Airbnb account.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 155:**

11 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 155**
15 **SHOULD BE COMPELLED:**

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

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

26 Plaintiff has not provided a responsive answer, and there is no indication in the response that
27 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

28 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
improper objections. As explained in *Brown & Weil*:

“[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”

1 objections; and ¶[8:1920]”
2 *Id.* at 8:1071.

3 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
4 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
5 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
6 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
7 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
8 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
9 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
10 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
11 response should be compelled.

12 **SPECIAL INTERROGATORY NO. 156:**

13 IDENTIFY all WITNESSES that support YOUR position in Paragraph 53 of YOUR
14 Complaint that PIERATTINI had anything to do with the alleged suspension of your Airbnb
15 account.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 156:**

17 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 156**

21 **SHOULD BE COMPELLED:**

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

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

29 Plaintiff has not provided a responsive answer, and there is no indication in the response that
30 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

1 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
2 improper objections. As explained in *Brown & Weil*:

3 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
4 the responding party may serve objections. ... Objections must be specific. A motion
5 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
6 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
7 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
8 objections; and ¶8:1920]”
9 *Id.* at 8:1071.

10 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
11 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
12 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
13 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
14 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
15 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
16 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
17 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
18 response should be compelled.

19 **SPECIAL INTERROGATORY NO. 157:**

20 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 53
21 of YOUR Complaint that PIERATTINI had anything to do with the alleged suspension of your
22 Airbnb account.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 157:**

24 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 157**

28 **SHOULD BE COMPELLED:**

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

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

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

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

8 Plaintiff has not provided a responsive answer, and there is no indication in the response that
9 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

10 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
11 improper objections. As explained in *Brown & Weil*:

12 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
13 the responding party may serve objections. ... Objections must be specific. A motion
14 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
15 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
16 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
17 objections; and ¶[8:1920]”
18 *Id.* at 8:1071.

19 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
20 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
21 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
22 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
23 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
24 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
25 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
26 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
27 response should be compelled.

28 **SPECIAL INTERROGATORY NO. 158:**

State all facts that support YOUR position in Paragraph 55 of YOUR Complaint that
PIERATTINI allegedly showed up at YOUR house and threatened YOU and YOUR roommate.

RESPONSE TO SPECIAL INTERROGATORY NO. 158:

Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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.

1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 158**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶[8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
25 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
26 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
27 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
28 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

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1 **SPECIAL INTERROGATORY NO. 159:**

2 IDENTIFY all WITNESSES that support YOUR position in Paragraph 55 of YOUR
3 Complaint that PIERATTINI allegedly showed up at YOUR house and threatened YOU and YOUR
4 roommate.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 159:**

6 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 159**

10 **SHOULD BE COMPELLED:**

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

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

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

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

21 Plaintiff has not provided a responsive answer, and there is no indication in the response that
22 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

23 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
24 improper objections. As explained in *Brown & Weil*:

25 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
26 the responding party may serve objections. ... Objections must be specific. A motion
27 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
28 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶[8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
32 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party

1 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
2 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
3 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
4 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
5 response should be compelled.

6 **SPECIAL INTERROGATORY NO. 160:**

7 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 55
8 of YOUR Complaint that PIERATTINI allegedly showed up at YOUR house and threatened YOU
9 and YOUR roommate.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 160:**

11 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 160**
15 **SHOULD BE COMPELLED:**

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

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

26 Plaintiff has not provided a responsive answer, and there is no indication in the response that
27 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

28 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
improper objections. As explained in *Brown & Weil*:

“[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”

1 objections; and ¶[8:1920]”
2 *Id.* at 8:1071.

3 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
4 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
5 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
6 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
7 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
8 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
9 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
10 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
11 response should be compelled.

12 **SPECIAL INTERROGATORY NO. 161:**

13 State all facts that support YOUR position in Paragraph 56 of YOUR Complaint that most of
14 the “62 young men” YOU graduated with in 1992 have allegedly been contacted by PIERATTINI.

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 161:**

16 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 161**

20 **SHOULD BE COMPELLED:**

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

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

29 Plaintiff has not provided a responsive answer, and there is no indication in the response that
30 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

31 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of

1 improper objections. As explained in *Brown & Weil*:

2 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
3 the responding party may serve objections. ... Objections must be specific. A motion
4 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
5 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
6 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
7 objections; and ¶8:1920]”
8 *Id.* at 8:1071.

9 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
10 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
11 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
12 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
13 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
14 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
15 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
16 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
17 response should be compelled.

18 **SPECIAL INTERROGATORY NO. 162:**

19 IDENTIFY all WITNESSES that support YOUR position in Paragraph 56 of YOUR
20 Complaint that most of the “62 young men” YOU graduated with in 1992 have allegedly been
21 contacted by PIERATTINI.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 162:**

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

26 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 162**

27 **SHOULD BE COMPELLED:**

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

- a) Each answer in a response to interrogatories shall be as complete and straightforward as the information reasonably available to the responding party permits.
- (b) If an interrogatory cannot be answered completely, it shall be answered to the extent possible.

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

6 Plaintiff has not provided a responsive answer, and there is no indication in the response that
7 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

8 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
9 improper objections. As explained in *Brown & Weil*:

10 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
11 the responding party may serve objections. ... Objections must be specific. A motion
12 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
13 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
14 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
15 objections; and ¶8:1920]”
16 *Id.* at 8:1071.

17 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
18 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
19 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
20 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
21 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
22 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
23 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
24 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
25 response should be compelled.

26 **SPECIAL INTERROGATORY NO. 163:**

27 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 56
28 of YOUR Complaint that most of the “62 young men” YOU graduated with in 1992 have allegedly
29 been contacted by PIERATTINI.

30 **RESPONSE TO SPECIAL INTERROGATORY NO. 163:**

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

1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 163**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
25 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
26 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
27 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
28 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

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1 **SPECIAL INTERROGATORY NO. 164:**

2 State all facts that support YOUR position in Paragraph 56 of YOUR Complaint that YOUR
3 roommate, David Condon, has allegedly “received harassment, trespass, and vandalism” by
4 PIERATTINI.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 164:**

6 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 164**

10 **SHOULD BE COMPELLED:**

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

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

21 Plaintiff has not provided a responsive answer, and there is no indication in the response that
22 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

23 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
24 improper objections. As explained in *Brown & Weil*:

25 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
26 the responding party may serve objections. ... Objections must be specific. A motion
27 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
28 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
32 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party

1 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
2 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
3 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
4 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
5 response should be compelled.

6 **SPECIAL INTERROGATORY NO. 165:**

7 IDENTIFY all WITNESSES that support YOUR position in Paragraph 56 of YOUR
8 Complaint that YOUR roommate, David Condon, has allegedly “received harassment, trespass, and
9 vandalism” by PIERATTINI.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 165:**

11 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 165**

15 **SHOULD BE COMPELLED:**

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

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

22 Plaintiff has not provided a responsive answer, and there is no indication in the response that
23 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

24 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
25 improper objections. As explained in *Brown & Weil*:

26 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
27 the responding party may serve objections. ... Objections must be specific. A motion
28 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”

1 objections; and ¶[8:1920]”
2 *Id.* at 8:1071.

3 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
4 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
5 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
6 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
7 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
8 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
9 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
10 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
11 response should be compelled.

12 **SPECIAL INTERROGATORY NO. 166:**

13 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 56
14 of YOUR Complaint that YOUR roommate, David Condon, has allegedly “received harassment,
15 trespass, and vandalism” by PIERATTINI.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 166:**

17 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 166**

21 **SHOULD BE COMPELLED:**

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

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

29 Plaintiff has not provided a responsive answer, and there is no indication in the response that
30 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

1 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
2 improper objections. As explained in *Brown & Weil*:

3 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
4 the responding party may serve objections. ... Objections must be specific. A motion
5 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
6 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
7 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
8 objections; and ¶8:1920]”
9 *Id.* at 8:1071.

10 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
11 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
12 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
13 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
14 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
15 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
16 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
17 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
18 response should be compelled.

19 **SPECIAL INTERROGATORY NO. 167:**

20 State all facts that support YOUR position in Paragraph 56 of YOUR Complaint that YOUR
21 previous investors, colleagues, and co-workers have allegedly received calls from PIERATTINI
22 questioning who YOU are and warning that YOU have “become a danger to them and they should
23 stay away from [YOU], ‘if they know what’s good for them’”.

24 **RESPONSE TO SPECIAL INTERROGATORY NO. 167:**

25 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 167**

SHOULD BE COMPELLED:

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

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

6 Plaintiff has not provided a responsive answer, and there is no indication in the response that
7 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

8 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
9 improper objections. As explained in *Brown & Weil*:

10 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
11 the responding party may serve objections. ... Objections must be specific. A motion
12 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
13 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
14 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
15 objections; and ¶8:1920]”
16 *Id.* at 8:1071.

14 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
15 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
16 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
17 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
18 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
19 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
20 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
21 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
22 response should be compelled.

23 **SPECIAL INTERROGATORY NO. 168:**

24 IDENTIFY all WITNESSES that support YOUR position in Paragraph 56 of YOUR
25 Complaint that YOUR previous investors, colleagues, and co-workers have allegedly received calls
26 from PIERATTINI questioning who YOU are and warning that YOU have “become a danger to
27 them and they should stay away from [YOU], ‘if they know what’s good for them’”.

28 ///

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 168:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 168**
6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 169:**

4 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 56
5 of YOUR Complaint that YOUR previous investors, colleagues, and co-workers have allegedly
6 received calls from PIERATTINI questioning who YOU are and warning that YOU have “become a
7 danger to them and they should stay away from [YOU], ‘if they know what’s good for them’”.

8 **RESPONSE TO SPECIAL INTERROGATORY NO. 169:**

9 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 169**

13 **SHOULD BE COMPELLED:**

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

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

24 Plaintiff has not provided a responsive answer, and there is no indication in the response that
25 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

26 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
27 improper objections. As explained in Brown & Weil:

28 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

1 Plaintiff's objection has no specificity and does not state the specific grounds for objection.
2 This interrogatory is directly based on Plaintiff's allegations against Mr. Pierattini in the complaint
3 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
4 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
5 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
6 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
7 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
8 Pierattini's defenses against Plaintiff's unsubstantiated claims against him. Therefore, a proper
9 response should be compelled.

10 **SPECIAL INTERROGATORY NO. 170:**

11 State all facts that support YOUR position in Paragraph 56 of YOUR Complaint that
12 PIERATTINI has allegedly been sending YOU harassing emails "forged to look like they're from a
13 court, two to three times a day since at least November 2022".

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 170:**

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

18 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 170**

19 **SHOULD BE COMPELLED:**

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

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

26 Plaintiff has not provided a responsive answer, and there is no indication in the response that
27 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

28 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of

1 improper objections. As explained in *Brown & Weil*:

2 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
3 the responding party may serve objections. ... Objections must be specific. A motion
4 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
5 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
6 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
7 objections; and ¶8:1920]”
8 *Id.* at 8:1071.

9 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
10 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
11 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
12 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
13 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
14 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
15 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
16 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
17 response should be compelled.

18 **SPECIAL INTERROGATORY NO. 171:**

19 IDENTIFY all WITNESSES that support YOUR position in Paragraph 56 of YOUR
20 Complaint that PIERATTINI has allegedly been sending YOU harassing emails “forged to look like
21 they’re from a court, two to three times a day since at least November 2022”.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 171:**

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

26 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 171**

27 **SHOULD BE COMPELLED:**

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

- a) Each answer in a response to interrogatories shall be as complete and straightforward as the information reasonably available to the responding party permits.
- (b) If an interrogatory cannot be answered completely, it shall be answered to the extent possible.

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

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

6 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
7 improper objections. As explained in *Brown & Weil*:

8 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
9 the responding party may serve objections. ... Objections must be specific. A motion
10 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.) (1997) 51 CA4th
11 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 172:**

22 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 56
23 of YOUR Complaint that PIERATTINI has allegedly been sending YOU harassing emails “forged
24 to look like they’re from a court, two to three times a day since at least November 2022”.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 172:**

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

1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 172**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
25 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
26 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
27 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
28 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

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1 **SPECIAL INTERROGATORY NO. 173:**

2 State all facts that support YOUR position in Paragraph 59 of YOUR Complaint that
3 PIERATTINI allegedly told the owners of the property where Mr. Kane was residing that YOU
4 were armed, dangerous, and wanted by the FBI.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 173:**

6 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 173**

10 **SHOULD BE COMPELLED:**

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

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

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

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

21 Plaintiff has not provided a responsive answer, and there is no indication in the response that
22 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

23 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
24 improper objections. As explained in *Brown & Weil*:

25 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
26 the responding party may serve objections. ... Objections must be specific. A motion
27 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
28 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
32 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party

1 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
2 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
3 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
4 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
5 response should be compelled.

6 **SPECIAL INTERROGATORY NO. 174:**

7 IDENTIFY all WITNESSES that support YOUR position in Paragraph 59 of YOUR
8 Complaint that PIERATTINI allegedly told the owners of the property where Mr. Kane was residing
9 that YOU were armed, dangerous, and wanted by the FBI.

10 **RESPONSE TO SPECIAL INTERROGATORY NO. 174:**

11 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 174**
15 **SHOULD BE COMPELLED:**

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

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

26 Plaintiff has not provided a responsive answer, and there is no indication in the response that
27 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

28 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
improper objections. As explained in *Brown & Weil*:

“[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea
Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”

1 objections; and ¶[8:1920]”
2 *Id.* at 8:1071.

3 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
4 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
5 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
6 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
7 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
8 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
9 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
10 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
11 response should be compelled.

12 **SPECIAL INTERROGATORY NO. 175:**

13 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 59
14 of YOUR Complaint that PIERATTINI allegedly told the owners of the property where Mr. Kane
15 was residing that YOU were armed, dangerous, and wanted by the FBI.

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 175:**

17 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 175**

21 **SHOULD BE COMPELLED:**

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

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

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

1 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
2 improper objections. As explained in *Brown & Weil*:

3 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
4 the responding party may serve objections. ... Objections must be specific. A motion
5 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
6 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
7 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
8 objections; and ¶8:1920]”
9 *Id.* at 8:1071.

10 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
11 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
12 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
13 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
14 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
15 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
16 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
17 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
18 response should be compelled.

19 **SPECIAL INTERROGATORY NO. 176:**

20 State all facts that support YOUR position in Paragraph 73 of YOUR Complaint that
21 PIERATTINI allegedly used YOUR likeness to advertise YouTube videos about YOU.

22 **RESPONSE TO SPECIAL INTERROGATORY NO. 176:**

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

26 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 176**

27 **SHOULD BE COMPELLED:**

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

- a) Each answer in a response to interrogatories shall be as complete and straightforward as the information reasonably available to the responding party permits.
- (b) If an interrogatory cannot be answered completely, it shall be answered to the extent possible.

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

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

6 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
7 improper objections. As explained in *Brown & Weil*:

8 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
9 the responding party may serve objections. ... Objections must be specific. A motion
10 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.) (1997) 51 CA4th
11 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 177:**

22 IDENTIFY all WITNESSES that support YOUR position in Paragraph 73 of YOUR
23 Complaint that PIERATTINI allegedly used YOUR likeness to advertise YouTube videos about
24 YOU.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 177:**

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

1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 177**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶[8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
25 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
26 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
27 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
28 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

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1 **SPECIAL INTERROGATORY NO. 178:**

2 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 73
3 of YOUR Complaint that PIERATTINI allegedly used YOUR likeness to advertise YouTube videos
4 about YOU.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 178:**

6 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 178**

10 **SHOULD BE COMPELLED:**

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

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

21 Plaintiff has not provided a responsive answer, and there is no indication in the response that
22 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

23 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
24 improper objections. As explained in *Brown & Weil*:

25 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
26 the responding party may serve objections. ... Objections must be specific. A motion
27 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
28 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
32 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party

1 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
2 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
3 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
4 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
5 response should be compelled.

6 **SPECIAL INTERROGATORY NO. 179:**

7 State all facts that support YOUR position in Paragraph 74 of YOUR Complaint that
8 PIERATTINI allegedly gained a commercial benefit “because their following, as well as [YOUR]
9 following, were looking for content about [YOU] and used the images to find the content, which
10 earned advertising revenue for the Defendants”.

11 **RESPONSE TO SPECIAL INTERROGATORY NO. 179:**

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

15 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 179**

16 **SHOULD BE COMPELLED:**

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

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

23 Plaintiff has not provided a responsive answer, and there is no indication in the response that
24 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

25 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
26 improper objections. As explained in Brown & Weil:

27 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
28 the responding party may serve objections. ... Objections must be specific. A motion
to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*

1 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
2 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
3 objections; *and* ¶8:1920”
4 *Id.* at 8:1071.

5 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
6 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
7 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
8 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
9 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
10 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
11 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
12 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
13 response should be compelled.

14 **SPECIAL INTERROGATORY NO. 180:**

15 IDENTIFY all WITNESSES that support YOUR position in Paragraph YOUR position in
16 Paragraph 74 of YOUR Complaint that PIERATTINI allegedly gained a commercial benefit
17 “because their following, as well as [YOUR] following, were looking for content about [YOU] and
18 used the images to find the content, which earned advertising revenue for the Defendants”.

19 **RESPONSE TO SPECIAL INTERROGATORY NO. 180:**

20 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 180**

24 **SHOULD BE COMPELLED:**

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

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

1 Plaintiff has not provided a responsive answer, and there is no indication in the response that
2 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

3 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
4 improper objections. As explained in *Brown & Weil*:

5 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
6 the responding party may serve objections. ... Objections must be specific. A motion
7 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
8 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
9 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
10 objections; and ¶8:1920]”
11 *Id.* at 8:1071.

12 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
13 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
14 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
15 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
16 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
17 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
18 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
19 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
20 response should be compelled.

21 **SPECIAL INTERROGATORY NO. 181:**

22 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 74
23 of YOUR Complaint that PIERATTINI allegedly gained a commercial benefit “because their
24 following, as well as [YOUR] following, were looking for content about [YOU] and used the
25 images to find the content, which earned advertising revenue for the Defendants”.

26 **RESPONSE TO SPECIAL INTERROGATORY NO. 181:**

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

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1 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 181**

2 **SHOULD BE COMPELLED:**

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

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

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

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

13 Plaintiff has not provided a responsive answer, and there is no indication in the response that
14 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

15 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
16 improper objections. As explained in *Brown & Weil*:

17 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
18 the responding party may serve objections. ... Objections must be specific. A motion
19 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
20 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
21 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
22 objections; and ¶[8:1920]”
23 *Id.* at 8:1071.

24 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
25 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint
26 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
27 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
28 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
response should be compelled.

29 **SPECIAL INTERROGATORY NO. 182:**

30 State all facts that support YOUR position in Paragraph 75 of YOUR Complaint that YOU
31 were allegedly harmed by not having that ad revenue YOURSELF, by the videos containing

1 negative content about YOU, and because “as a trained actor, [YOU] charge fees and have been
2 paid for [YOUR] likeness”.

3 **RESPONSE TO SPECIAL INTERROGATORY NO. 182:**

4 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 182**

8 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶[8:1920]”
Id. at 8:1071.

29 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
30 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
31 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
32 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
33 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
34 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration

1 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
2 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
3 response should be compelled.

4 **SPECIAL INTERROGATORY NO. 183:**

5 IDENTIFY all WITNESSES that support YOUR position in Paragraph 75 of YOUR
6 Complaint that YOU were allegedly harmed by not having that ad revenue YOURSELF, by the
7 videos containing negative content about YOU, and because “as a trained actor, [YOU] charge fees
8 and have been paid for [YOUR] likeness”.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 183:**

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

13 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 183**

14 **SHOULD BE COMPELLED:**

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

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

21 Plaintiff has not provided a responsive answer, and there is no indication in the response that
22 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

23 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
24 improper objections. As explained in *Brown & Weil*:

25 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
26 the responding party may serve objections. ... Objections must be specific. A motion
27 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
28 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
objections; and ¶8:1920]”
Id. at 8:1071.

1 Plaintiff's objection has no specificity and does not state the specific grounds for objection. This
2 interrogatory is directly based on Plaintiff's allegations against Mr. Pierattini in the complaint and is
3 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
4 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
5 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
6 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
7 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
8 Pierattini's defenses against Plaintiff's unsubstantiated claims against him. Therefore, a proper
9 response should be compelled.

10 **SPECIAL INTERROGATORY NO. 184:**

11 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 75
12 of YOUR Complaint that YOU were allegedly harmed by not having that ad revenue YOURSELF,
13 by the videos containing negative content about YOU, and because "as a trained actor, [YOU]
14 charge fees and have been paid for [YOUR] likeness".

15 **RESPONSE TO SPECIAL INTERROGATORY NO. 184:**

16 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 184**

20 **SHOULD BE COMPELLED:**

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

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

29 Plaintiff has not provided a responsive answer, and there is no indication in the response that
30 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

1 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
2 improper objections. As explained in *Brown & Weil*:

3 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
4 the responding party may serve objections. ... Objections must be specific. A motion
5 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
6 *Data Systems Co. Ltd. v. Sup.Ct. (Amazing Technologies Corp.)* (1997) 51 CA4th
7 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
8 objections; and ¶8:1920]”
9 *Id.* at 8:1071.

10 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
11 interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
12 therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
13 Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
14 seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
15 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
16 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
17 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
18 response should be compelled.

19 **SPECIAL INTERROGATORY NO. 185:**

20 State all facts that support YOUR position in Paragraph 76 of YOUR Complaint that YOU
21 allegedly suffered financial loss, “momentum to grow [YOUR] brand,” humiliation, embarrassment,
22 mental distress, and economic harm.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 185:**

24 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 185**

28 **SHOULD BE COMPELLED:**

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

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

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 186:**

2 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 186**
6 **SHOULD BE COMPELLED:**

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

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

17 Plaintiff has not provided a responsive answer, and there is no indication in the response that
18 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

19 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
20 improper objections. As explained in *Brown & Weil*:

21 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
22 the responding party may serve objections. ... Objections must be specific. A motion
23 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
24 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
25 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
26 objections; and ¶[8:1920]”
27 *Id.* at 8:1071.

28 Plaintiff’s objection has no specificity and does not state the specific grounds for objection. This
interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint and is
therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of Civil
Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the party
seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
attached. This request is specifically tailored to obtain information that is essential to supporting Mr.

1 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
2 response should be compelled.

3 **SPECIAL INTERROGATORY NO. 187:**

4 DESCRIBE and IDENTIFY all DOCUMENTS that support YOUR position in Paragraph 76
5 of YOUR Complaint that YOU allegedly suffered financial loss, “momentum to grow [YOUR]
6 brand,” humiliation, embarrassment, mental distress, and economic harm.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 187:**

8 Plaintiff objects in full on the following grounds: 1) Number of interrogatories 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 **REASON WHY FURTHER RESPONSE TO SPECIAL INTERROGATORY NO. 187**
12 **SHOULD BE COMPELLED:**

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

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

19 Plaintiff has not provided a responsive answer, and there is no indication in the response that
20 Plaintiff has made a reasonable and good faith effort to obtain the information requested.

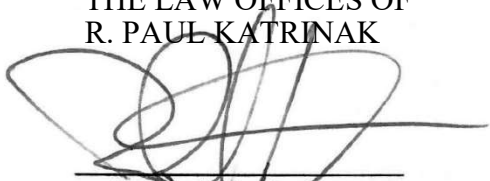
21 Additionally, rather than providing a proper answer, Plaintiff has responded with a flurry of
22 improper objections. As explained in *Brown & Weil*:

23 “[8:1071] Objections: In lieu of answering or allowing inspection of records, above,
24 the responding party may serve objections. ... Objections must be specific. A motion
25 to compel lies where objections are “too general.” [CCP § 2030.300(a)(3); see *Korea*
26 *Data Systems Co. Ltd. v. Sup.Ct. (Aamazing Technologies Corp.)* (1997) 51 CA4th
27 1513, 1516, 59 CR2d 925, 926—objecting party subject to sanctions for “boilerplate”
28 objections; and ¶8:1920]”
Id. at 8:1071.

27 Plaintiff’s objection has no specificity and does not state the specific grounds for objection.
28 This interrogatory is directly based on Plaintiff’s allegations against Mr. Pierattini in the complaint

1 and is therefore supported by good cause. Furthermore, under § 2030.040 of the California Code of
2 Civil Procedure, a party may exceed the 35-interrogatory limit set by § 2030.030 so long as the
3 party seeking additional discovery attaches a supporting declaration as described in § 2030.050. The
4 Special Interrogatories Mr. Pierattini propounded were delivered to Plaintiff with such a declaration
5 attached. This request is specifically tailored to obtain information that is essential to supporting Mr.
6 Pierattini’s defenses against Plaintiff’s unsubstantiated claims against him. Therefore, a proper
7 response should be compelled.

8
9 DATED: January 25, 2024

10 THE LAW OFFICES OF
11 R. PAUL KATRINAK
12 
13 R. Paul Katrinak
14 Attorneys for Defendant
15 Michael Pierattini

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

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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 25, 2024, I served the foregoing document(s) described as:

9 **SEPARATE STATEMENT IN SUPPORT OF DEFENDANT MICHAEL
10 PIERATTINI'S MOTION TO COMPEL FURTHER RESPONSES TO
11 DEFENDANT MICHAEL PIERATTINI'S SPECIAL INTERROGATORIES TO
12 PLAINTIFF JOSE DECASTRO, SET ONE, AND REQUEST FOR MONETARY
13 SANCTIONS AGAINST PLAINTIFF IN THE SUM OF \$4,560.00**

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

15 Jose DeCastro
16 1258 Franklin Street
17 Santa Monica, CA 90404
18 chille@situationcreator.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 (BY EMAIL) I caused such documents to be delivered via electronic mail to the
25 email address for counsel indicated above.

26 Executed January 25, 2024, at Los Angeles, California.

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

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R. Paul Katrinak

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