

1 Jose DeCastro
1258 Franklin St.
2 Santa Monica, CA 90404
310-963-2445
3 iamalaskan@gmail.com
In Pro Per
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Superior Court of California,
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David W. Slayton,
Executive Officer/Clerk of Court,
By K. Parenteau, Deputy Clerk

8 **SUPERIOR COURT OF CALIFORNIA**
9 **COUNTY OF LOS ANGELES**
10

11 JOSE DECASTRO

12 Plaintiff,

13 vs.

14 KATHERINE PETER, et al.

15 Defendants.
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21

) Case No.: 23SMCV00538
)
) **PLAINTIFF’S NOTICE OF MOTION AND**
) **MOTION TO COMPEL RESPONSES TO**
) **PLAINTIFF’S REQUEST FOR**
) **PRODUCTION OF DOCUMENTS TO**
) **MICHAEL PIERATTINI, SET TWO AND**
) **REQUEST FOR MONETARY SANCTIONS;**
) **DECLARATION OF JOSE DECASTRO IN**
) **SUPPORT; MEMORANDUM OF POINTS**
) **AND AUTHORITIES;**
)
) **Telephone Appearance**
)
) Judge: Hone. H. Jay Ford III
)
) Date: May 16, 2024
) Time: 8:30 am
) Department: O
) **RES ID: 310786113364**

22 *“Absolutely not. Your requests are completely objectionable*
23 *and frankly absurd.”*

Paul Katrinak, March 1, 2024

in an email, his complete and only timely response to plaintiff’s RFP.

24 TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:
25

1 PLEASE TAKE NOTICE that on May 16, 2024, at 8:30 AM, or as soon thereafter as the
2 matter may be heard in Department O of the above-entitled court, located at 1725 Main Street Santa
3 Monica, CA 90401, Plaintiff Jose DeCastro (“Plaintiff”, “me” or “I”) will, and hereby does, move
4 the Court for an order compelling Michael Pierattini (“Pierattini”) to produce responsive documents
5 pursuant to Plaintiff’s Requests for Production of Documents, Set Two (the “Requests”), served on
6 Plaintiff on February 5, 2024, and requests monetary sanctions against Plaintiff in the amount of
7 \$4,999.99.

8 This Motion is made pursuant to Code of Civil Procedure section 2031.310 on the grounds that
9 Pierattini’s responses to Plaintiff’s Requests consist exclusively of meritless objections and no
10 responses. Further, Plaintiff met and conferred with Pierattini in good faith to no avail.

11 This Motion is based upon this Notice, the attached Memorandum of Points and Authorities in
12 support thereof, the included Declaration of Jose DeCastro, and all pleadings, records, and papers on
13 file herein, as well as such other oral arguments as may be presented at the hearing on this Motion.

14 **MEMORANDUM OF POINTS AND AUTHORITIES**

15 **I. INTRODUCTION**

16 Pierattini is engaging in recreational litigation against Plaintiff. Plaintiff’s Complaint clearly
17 mentions Pierattini and primarily takes issue with the harassing and cyberstalking conduct he and
18 through the doctrine of agency, his colleagues at Masshole Troll Mafia, for some reason, Pierattini
19 refuses to provide the information that he has on his colleagues, but prefers to pretend to be a white
20 knight taking on DeCastro for their benefit. Frankly, Pierattini begged to be sued by Plaintiff by
21 continuing his harassment and literally inviting Plaintiff to sue him in lieu of stopping his
22 harassment of Plaintiff. The facts important for this Motion are that on February 5, 2024, Plaintiff
23 served Plaintiff’s Requests for Production of Documents, Set Two (the “Requests”) to Pierattini by
24 electronic mail. (Ex. “1”.)

25 To date, Plaintiff has received no substantive responses to any of the Requests. Instead,

1 Pierattini has “responded” to Mr. Plaintiff’s Requests with a single line in an email. Pierattini has yet
2 to produce even a single document in response to Plaintiff’s Requests.

3 Plaintiff respectfully requests the Court order Pierattini to provide full and complete verified
4 responses and produce responsive documents without objection to the Requests propounded.
5 Plaintiff additionally requests that the Court impose mandatory sanctions against Pierattini in the
6 amount of \$4,999.99.¹

7 **II. FACTUAL AND PROCEDURAL BACKGROUND**

8 Plaintiff filed this lawsuit against Pierattini and several other defendants alleging eight causes
9 of action. Plaintiff sent a request for production of documents to Pierattini on July 30, 2023.
10 Pierattini never objected to any of the requests but also only provided responses to two of the 30
11 requests, and those two only partially. Plaintiff was super patient with Pierattini, stipulating to a
12 protective order, and continuing to wait for responses. Instead of sending promised responses,
13 Pirattini sent Plaintiff hundreds of frivolous and excessive requests for production, over the court
14 limits, wholly objectionable as to substance and form. Plaintiff filed his objections on time, and had
15 scheduled a meeting with Pierattini’s counsel to discuss an extension of time to file responses.
16 Pierattini’s counsel canceled that meeting and instead filed over 300 pages of motions to compel and
17 for sanctions. Pierattini’s requests for sanctions were partially based on a deposition that Pirattini
18 scheduled simply to harass Plaintiff in that it did not follow the court’s rules when scheduling it,
19 intentionally scheduled it during Plaintiff’s conflicting trial, intentionally scheduled it in a different
20 city than Plaintiff resides and in different city than the trial. Pierattini further alleges that he suffered
21 monetary damages for failing to cancel the desposition even though Plaintiff objected to the
22 desposition more than 30 days before it was scheduled. Plaintiff sent over a very limited and clear

23 ¹ Counsel for Mr. Pierattini called the Clerk’s office to inquire whether an informal discovery conference would be
24 required before the filing of sanctions motions. The Clerk stated that the informal discovery conference does not toll the
25 timeframe for the Motion, so it would be fine to file the Motion without an informal discovery conference. The Clerk
also stated that the Court would schedule the informal discovery conference on the same date as the hearing on the
Motion and that if the issues are not resolved then there would be a hearing.

1 Request for non-privileged emails discussing the scheduling of the deposition, to prove that
2 Pierattini was aware of my residence and my trial and intentionally scheduled it during that time, and
3 that Pierattini in fact did not have billing receipts of a deposition that was never canceled. Instead of
4 responding, Pierattini has instead engaged in gamesmanship by improperly objecting to Plaintiff's
5 discovery requests at sporadic intervals. Pierattini has refused to provide any information and has
6 provided no documents, even though Plaintiff properly responded to Pierattini's own discovery
7 requests. This discovery would have been further proof of harassment by Pierattini of plaintiff and of
8 factual claims that Pierattini and his counsel made in affidavits.

9 On February 5, 2024, Plaintiff propounded Plaintiff's Requests for Production of Documents,
10 Set Two on Pierattini. (Ex. "1".)

11 On February 29, 2024, Plaintiff emailed Pierattini's counsel "Just a reminder that these are due
12 on March 6, the day before the hearing". Reminding Pierattini that the responses were due before the
13 hearing where they were relevant. On the same day, Pierattini's counsel replied with "That is not
14 correct."

15 On March 1, 2024, Plaintiff emailed Pierattini's counsel "When are you saying they're due
16 then, and can you cite the law? Would you stipulate to rescheduling your contempt and compel
17 hearings until after they're due? Or should I file another ex parte motion?" On the same day,
18 Pierattini's counsel replied with "Absolutely not. Your requests are completely objectionable and
19 frankly absurd. There is no basis for another ex parte. If you bring one, I will seek sanctions. You
20 have created this fantasy in your mind that has no basis in reality about Mr. Pierattini."

21 On March 11, 2024, Plaintiff sent a letter attempting to meet and confer with Pierattini
22 regarding his failure to properly respond to Plaintiff's discovery requests. (Ex. "2".) True to form,
23 Pierattini ignored Plaintiff's attempt to meet and confer, forcing counsel Plaintiff to file this Motion.

24 **III. THE COURT IS AUTHORIZED TO GRANT THIS MOTION TO COMPEL FURTHER**
25 **RESPONSES**

1 Code of Civil Procedure section 2031.310 states:

2 “On receipt of a response to a demand for inspection, copying, testing, or sampling, the
3 demanding party may move for an order compelling further response to the demand if the
demanding party deems that any of the following apply:

- 4 (1) A statement of compliance with the demand is incomplete.
5 (2) A representation of inability to comply is inadequate, incomplete, or evasive.
6 (3) An objection in the response is without merit or too general.”

7 Code Civ. Proc. § 2031.310(a).

8 The court has the inherent power to resolve discovery disputes. “The [Discovery Act] is to be
9 liberally interpreted so that it may accomplish its purpose. The trial court has a wide discretion in
10 granting discovery.” *Caryl Richards, Inc. v. Super. Ct.* (1961) 188 Cal.App.2d 300, 303. As
11 discussed below Pierattini served evasive, nonresponsive answers, which included general and
12 meritless objections. Accordingly, the Court is authorized to compel further responses for the
13 reasons stated below.

14 **IV. LAW APPLICABLE TO PLAINTIFF’S REFUSAL TO PROVIDE PROPER**
15 **RESPONSES**

16 **A. The Right to Discovery**

17 The right to discovery is liberally construed. As noted in a leading treatise, Brown &
18 Weil, California Practice Guide: Civil Procedure Before Trial (2017 update):

19 “[8:36] Right to Discovery Liberally Construed: Courts have construed the discovery statutes
20 broadly, so as to *uphold the right to discovery wherever possible*. [*Greyhound Corp. v. Sup.Ct.*
21 (*Clay*) (1961) 56 C2d 355, 377-378, 15 CR 90, 100 (decided under former law); *Emerson Elec.*
22 *Co. v. Sup.Ct. (Grayson)* (1997) 16 C4th 1101, 1108, 68 CR2d 883, 886—“Our conclusions in
23 *Greyhound* apply equally to the new discovery statutes enacted by the Civil Discovery Act of
24 1986, which retain the expansive scope of discovery”; see *Obregon v. Sup.Ct. (Cimm’s, Inc.)*
25 (1998) 67 CA4th 424, 434, 79 CR2d 62, 69 (citing text)]

26 **B. Plaintiff’s Legal Obligations Concerning These Discovery Responses**

27 As noted in Brown & Weil, the format of responses is identical to those for
28 interrogatories. There is a duty to provide complete answers:

29 **“Duty to provide “complete” answers:** Each answer in the response must be “*as complete*
30 and *straightforward* as the information reasonably available to the responding party permits.

1 If an interrogatory cannot be answered completely, it shall be answered to the extent
2 possible.” [CCP § 2030.220(a),(b) (emphasis added)]”.

3 Pierattini’s responses to Plaintiff’s discovery requests are, at best, evasive. Plaintiff does not
4 adequately respond, nor does he comply with the Code. Further, evasive responses constitute
5 sanctionable conduct. Code Civ. Proc. § 2023.010(f).

6 **C. Pierattini has Refused to Provide Proper Responses to Plaintiff’s Requests for**
7 **Production of Documents**

8 With regard to Plaintiff’s requests, Pierattini does not state that he is producing all documents
9 as required by the Code. In fact, Pierattini has refused to produce any documents. Plaintiff’s
10 responses are thus improper. As noted in Brown & Weil, the response must be as follows:

11 [8:1469] Content: The party to whom the CCP § 2031.010 demand is directed must respond
12 separately to each item in the demand by one of the following:

- 13 • **Agreement to comply:** A statement that the party will comply by the date
14 set for inspection with the particular demand for inspection, testing, etc.; or
- 15 • **Representation of inability to comply:** A statement that the party lacks the
16 ability to comply with the particular demand; or
- 17 • **Objections:** An objection to all or part of the demand. [CCP § 2031.210(a)]

18 Pierattini must state that he has produced all responsive documents. The way that Pierattini’s
19 responses are written, Pierattini could produce documents at the last minute and claim he did not
20 represent that he had produced all documents. Pierattini’s responses to Plaintiff’s Requests fail to
21 state what the code requires them to state.

22 Brown & Weil makes plain the duty to obtain information. It states:

23 **“Duty to obtain information:** “If the responding party does not have personal knowledge
24 sufficient to respond fully to an interrogatory, that party shall so state, *but shall make a*
25 *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.”
[CCP § 2030.220(c) (emphasis added); *Regency Health Services, Inc. v. Sup.Ct. (Settles)*
(1998) 64 CA4th 1496, 1504, 76 CR2d 95, 100 (citing text)]”.

26 *Id.* at 8:1051. Certainly, Pierattini knows that he has not produced any responsive documents.

27 Again, as plainly noted in Brown & Weil:

28 **“Information available from sources under party’s control:** In answering interrogatories, a

1 party must furnish information available from sources under the party's control: "(A party)
2 cannot plead ignorance to information which can be obtained from sources under his control."
3 [*Deyo v. Kilbourne*, supra, 84 CA3d at 782, 149 CR at 509 (parentheses added); *Regency
Health Services, Inc. v. Sup.Ct. (Settles)* (1998) 64 CA4th 1496, 1504, 76 CR2d 95, 100 (citing
text)]".

4 *Id.* at 8:1054. The information sought is presumably available, and on that issue Brown &
5 Weil states:

6 **"Information presumably available to responding party:** Another consequence of the duty
7 to attempt to obtain information is that "I don't know" or "Unknown" are *insufficient* answers
8 to matters presumably known to the responding party. (Example: Question asks, "What is the
9 name and address of each physician who treated you for the injuries described in your
10 complaint?") The responding party must make a reasonable effort to obtain whatever
11 information is sought; and if unable to do so, must *specify* why the information is unavailable
12 and *what efforts he or she made to obtain it*. [See *Deyo v. Kilbourne* (1978) 84 CA3d 771, 782,
13 149 CR 499, 509]"

14 *Id.* at 8:1061.

15 **D. Pierattini's Objections are Improper**

16 Rather than providing proper responses, Pierattini has responded to Plaintiff's Requests with a
17 flurry of improper objections. As explained in Brown & Weil:

18 "[8:1071] Objections: In lieu of answering or allowing inspection of records, above, the
19 responding party may serve objections. Each objection must be stated separately (no objections
20 to entire set), and must bear the same number or letter as the interrogatory to which it is
21 directed. [CCP § 2030.210(a)(3)]

22 Objections must be *specific*. A motion to compel lies where objections are "too general."
23 [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
24 for "boilerplate" objections; and ¶8:1920]"

25 *Id.* at 8:1071 (discussing interrogatories). The same holds true for requests for
production of documents:

"If only part of an item or category demanded is objectionable, the response must contain an
agreement to comply with the remainder, or a representation of inability to comply. [CCP §
2031.240(a)] (General objections to the entire request are unauthorized and constitute
discovery misuse; see ¶8:1071."

Id. at 8:1469.

Pierattini's objections to Plaintiff's Requests have no specificity and do not state the specific

1 grounds for objection. As explained in Brown & Weil:

2 “[8:1474] **Objections:** The responding party may object to any item or category
3 demanded in whole or in part. To be effective, the objection must:

- 4 • *Identify with particularity* the specific document or evidence demanded as to which
5 the objection is made; and
- 6 • Set forth the *specific ground* for objection, including claims of privilege or work
7 product protection. [CCP § 2031.240(b); see *Standon Co., Inc. v. Sup.Ct. (Kim)*
8 (1990) 225 CA3d 898, 901, 275 CR 833, 834—objections constitute implicit refusals
9 to produce]”

10 *Id.* at 8:1474. One specific set of objections by Pierattini stands out as completely frivolous
11 based on its lack of specificity: Pierattini’s objections to Requests 1-4, which state “Absolutely not.
12 Your requests are completely objectionable and frankly absurd.”

13 This objection to all of Plaintiff’s Requests fails to clearly state the extent of and specific
14 grounds for the objection, instead opting for a “see-what-sticks” approach. Pierattini cannot
15 generally state that i.e. responsive documents were either destroyed, lost, misplaced, stolen, or never
16 existed. Plaintiff must be specific. Furthermore, if Plaintiff truly does not have any documents to
17 respond to Plaintiff’s Requests, which are fully based on Pierattini’s allegations against Plaintiff,
18 then Plaintiff *must* dismiss his sanctions claims against Plaintiff.

19 Objections Common to Requests for Production Nos. 1-4:

20 Plaintiff’s objections that each Request is “Absolutely not. Your requests are completely
21 objectionable and frankly absurd” are without merit and improper. Unless otherwise specified, the
22 relevant period encompasses the time during which Pierattini’s allegations against Plaintiff occurred
23 up until the present day, the entirety of which is fully relevant to this litigation. Additionally, as
24 discussed above, the scope of discovery is extremely broad and allows for discovery reasonably
25 calculated to lead to the discovery of admissible evidence. Pierattini does not have the right to
arbitrarily proclaim that a Request is somehow unrelated to the subject matter of the litigation and
then refuse to respond to that Request.

Additionally, Pierattini’s objections that each Request “calls for the disclosure of information

1 protected from discovery by the attorney-client privilege or Absolutely not. Your requests are
2 completely objectionable and frankly absurd” are absurd and are without merit. The attorney-client
3 privilege does not apply to Pierattini as he is not an attorney, as it is legally and factually impossible
4 for him to have “communications” with himself. If for some reason such a privilege does apply, then
5 Plaintiff must be prepared to explain why the privilege is applicable to each individual Request. In
6 addition, and as discussed below, Plaintiff must prepare a privilege log that identifies each document
7 withheld in response to Plaintiff’s Requests and the specific privilege claimed. Pierattini has not
8 produced a single document, so presumably, this privilege log would be extensive. The information
9 in the privilege log must be sufficiently specific to allow a determination of whether each withheld
10 document is or is not in fact privileged.

11 Pierattini’s further objections that each Request is objectionable because “[i]t seeks proprietary
12 information that is a trade secret or Absolutely not. Your requests are completely objectionable and
13 frankly absurd” are without merit and improper. Since Plaintiff’s Requests do not suggest or imply
14 that Pierattini must produce documents containing any alleged “trade secrets” or other confidential
15 information, this objection is unnecessary and baseless. Additionally, a protective order is in place,
16 so this objection is moot. On the contrary, these Requests seek documents that support Pierattini’s
17 allegations against Plaintiff. If Pierattini refuses to provide such supporting documents during the
18 discovery period, then he must dismiss his case against Plaintiff based on a complete lack of
19 evidence. It is not Plaintiff’s job to build Pierattini’s case for him while Pierattini lobs outrageous
20 allegations at Plaintiff.

21 Pierattini’s objections that each Request is objectionable because “[i]t seeks ESI that is not
22 reasonably accessible to Pierattini and Pierattini will not proceed without an agreement of costs
23 Absolutely not. Your requests are completely objectionable and frankly absurd” are without merit.
24 Pierattini has a duty to produce documents. For Pierattini to claim that all of the responsive
25 documents are “not reasonably accessible” to him is outrageous. Communications Pierattini has had

1 are accessible to him. Emails Pierattini has sent and received are accessible to him. The videos
2 Pierattini has made are accessible to him. The list goes on. Pierattini cannot claim that all responsive
3 documents are difficult-to-access ESI, and then refuse to provide any responsive documents. If
4 Pierattini truly does not have any documents to respond to these Requests, which are fully based on
5 his allegations against Plaintiff, then Pierattini must dismiss his claims against Plaintiff.

6 Additional Objections Common to Requests for Production Nos. 1-4:

7 Pierattini's objections to the Request that they are "so vague and ambiguous that Pierattini
8 cannot in good faith determine the scope of the request or Absolutely not. Your requests are
9 completely objectionable and frankly absurd" are without merit. Frankly, Plaintiff's Requests are
10 very specific as to the information they seek. Each Request designates the documents to be produced
11 either by specifically describing each document or by reasonably particularizing each category of
12 document, as required by California Code Civ. Proc. § 2031.030. Some of them, such as Requests 1,
13 2, 3, and 4, even go so far as to specify the *exact* document or item being sought.

14 Relevance and Scope Objections:

15 Pierattini's relevance and scope objections to Requests 1, 2, 3, and 4 are without merit. As
16 discussed above, the scope of discovery is extremely broad and allows for discovery reasonably
17 calculated to lead to the discovery of admissible evidence. Pierattini cannot arbitrarily proclaim that
18 a Request is "irrelevant" and/or "beyond the scope of discovery" and then refuse to respond to that
19 Request. Additionally, Pierattini cannot improperly refuse to with "Absolutely not. Your requests are
20 completely objectionable and frankly absurd" (as Plaintiff did with Requests 1-4).

21 Pierattini's improper objections to Plaintiff's Requests should be overruled in their entirety and
22 Pierattini should be ordered to provide a Code-compliant response without objection.

23 **E. The Required Privilege Log Is Missing**

24 As explained in *Brown & Weil*:

25 (a) [8:1474.5] **Objection based on privilege; "privilege log" may be required:** When

1 asserting claims of privilege or attorney work product protection, the objecting party must
2 provide “sufficient factual information” to enable other parties to evaluate the merits of the
3 claim, “including, if necessary, a privilege log.” [CCP § 2031.240(c)(1) (emphasis added);
4 *Lopez v. Watchtower Bible & Tract Soc. of New York, Inc.* (2016) 246 CA4th 566, 596-597,
5 201 CR3d 156, 181—burden to show preliminary facts supporting application of privilege not
6 met where D failed to produce privilege log or identify any specific confidential
7 communications]

8 1) [8:1474.5a] **Required contents of privilege log:** As the term is commonly used by courts
9 and attorneys, a “privilege log” identifies each document for which a privilege or work
10 product protection is claimed, its author, recipients, date of preparation, and the specific
11 privilege or work product protection claimed.

12 6. [8:1458] Responding to Demand, Cal. Prac. Guide Civ. Pro. Before Trial Ch. 8H-6.

13 Here, Pierattini provides no privilege log but still claims protection under the attorney client
14 privilege. Additionally, there is no undue burden defense to preparing a privilege log. *Riddell, Inc. v.*
15 *Super. Ct.* (2017) 14 Cal.App.5th 755, 772. In ruling on a motion to compel document production, a
16 court may compel the party objecting on grounds of privilege to provide a privilege log. Further,
17 “the information in the privilege log must be sufficiently specific to allow a determination of
18 whether each withheld document is or is not fact privileged.” *Wellpoint Health Networks, Inc. v.*
19 *Super. Ct.* (1997) 59 Cal.App.4th 110, 129–30.

20 **V. GOOD CAUSE EXISTS FOR COMPELLING FURTHER RESPONSES**

21 A motion to compel further responses to an inspection demand must “set forth specific facts
22 showing good cause justifying the discovery sought by the demand.” Code Civ. Proc. §
23 2031.310(b)(1). “Good cause” for production of documents may be established where it is shown
24 that the request is made in good faith and that the documents sought are relevant to the subject
25 matter and material to the issues in the litigation. See *Associated Brewers Distrib. Co. v. Super. Ct.*
(1967) 65 Cal.2d 583. “For discovery purposes, information is relevant if it ‘might reasonably assist
a party in evaluating the case, preparing for trial, or facilitating settlement Admissibility is not
the test[.]’” *Gonzalez v. Super. Ct.* (1995) 33 Cal.App.4th 1539, 1546 (citation omitted, emphasis in
original). See also Code Civ. Proc. § 2017.010 (nonprivileged information is discoverable if it

1 “appears reasonably calculated to lead to the discovery of admissible evidence.”).

2 If good cause is shown, the burden shifts to the responding party to justify any objection made
3 to document production. *Kirkland v. Super. Ct.* (2002) 95 Cal.App.4th 92, 98 (citing *Coy v. Super.*
4 *Ct.* (1962) 58 Cal.2d 210, 220–21). It has been held reversible error to deny discovery where the
5 objectives of discovery—preventing surprise at trial and allowing proper preparation for trial—are
6 defeated by the denial. *Associated Brewers*, 65 Cal.2d 583.

7 Here, each and every one of Plaintiff’s Requests is supported by good cause and specifically
8 tailored to obtain documents that are essential to supporting Plaintiff’s defenses against Pierattini’s
9 frivolous claims against him. Plainly, Plaintiff still does not fully understand Pierattini’s allegations
10 against him, as Pierattini’s meandering motions to compel of over 300 pages are difficult to follow.
11 A crucial purpose of Plaintiff’s discovery requests is to understand exactly what Pierattini’s
12 allegations against Plaintiff are, and what support, if any, Pierattini has for these allegations.

13 **Request Nos. 1 and 2** seek documents concerning communications between Pierattini and his
14 counsel regarding the scheduling or planning of the “Deposition of Jose DeCastro”. Documents
15 concerning these communications are essential to Plaintiff’s defense against Pierattini’s claims
16 against him because they would show that Pierattini and his counsel have filed this litigation without
17 proper legal or factual basis in order to harass Plaintiff.

18 **Request Nos. 3 and 4** seek documents concerning Pierattini’s claims for damages, including
19 reputational damages. These documents are essential to Plaintiff’s defense against Pierattini’s claims
20 against him because they would show that Pierattini did not suffer any damages as a result of
21 Plaintiff’s alleged conduct.

22 **VI. PLAINTIFF MET AND CONFERRED IN GOOD FAITH**

23 A motion to compel further responses to an inspection demand “shall be accompanied by a
24 meet and confer declaration under Section 2016.040.” Code Civ. Proc. § 2031.310(b)(2). “A meet
25 and confer declaration in support of a motion shall state facts showing a reasonable and good faith

1 attempt at an informal resolution of each issue presented by the motion.” Id. § 2016.040. Here, as
2 described above, I attested to my meet and confer efforts with Plaintiff in writing. My meet and
3 confer efforts were substantially more than what Pierattini engaged in when this Court granted his
4 motion for sanctions. Pierattini has responded with stonewalling and a refusal to produce complete,
5 Code-compliant responses and responsive documents. Thus, Plaintiff has fully met and conferred as
6 required by statute, and Pierattini has left Plaintiff with no other option but to seek assistance from
7 the Court by filing this Motion.

8 **VII. THIS MOTION IS TIMELY FILED**

9 Code of Civil Procedure section 2031.310, subdivision (c) states:

10 Unless notice of this motion is given within 45 days of the service of the *verified* response, or
11 any supplemental **verified** response, or on or before any specific later date to which the
12 demanding party and the responding party have agreed in writing, the demanding party waives
any right to compel a further response to the demand.

13 Code Civ. Proc. § 2031.310(c) (emphasis added). *See also Steven M. Garber & Assocs. v.*
14 *Eskandarian* (2007) 150 Cal.App.4th 813, 817 at n.4, *as modified* (May 22, 2007) (“unverified
15 responses ‘are tantamount to no responses at all.’”).

16 Here, Plaintiff is timely filing this Motion within the 45-day statutory deadline. Pierattini’s
17 verification of their responses to Plaintiff’s Requests was served on March 1, 2024. Therefore, this
18 Motion is timely filed.

19 **VIII. MONETARY SANCTIONS AGAINST PIERATTINI ARE WARRANTED FOR**
20 **FAILURE TO RESPOND TO LEGITIMATE DISCOVERY AND FOR NECESSITATING**
21 **THIS MOTION**

22 Section 2023.030(a) of the Code of Civil Procedure provides that “[t]he court may impose a
23 monetary sanction ordering that one engaging in the misuse of the discovery process, or any attorney
24 advising that conduct, or both pay the reasonable expenses, including attorney’s fees, incurred by
25 anyone as a result of that conduct.” *Id.* “Misuses of the discovery process include, but are not limited

1 to . . . (e) Making, without substantial justification, an unmeritorious objection to discovery. . . . (f)
2 Making an evasive response to discovery. . . . (h) Making or opposing, unsuccessfully and without
3 substantial justification, a motion to compel or to limit discovery.” *Id.* § 2023.010.

4 “The court *shall* impose a monetary sanction . . . against any party, person, or attorney who
5 unsuccessfully makes or opposes a motion to compel further response to a demand, unless it finds
6 that the one subject to the sanction acted with substantial justification or that other circumstances
7 make the imposition of the sanction unjust.” *Id.* § 2031.310(h) (emphasis added). These sanctions
8 may be awarded “under the Discovery Act in favor of a party who files a motion to compel
9 discovery, even though no opposition to the motion was filed, or an opposition to the motion was
10 withdrawn, or the requested discovery was provided to the moving party after the motion was filed.”
11 Cal. R. Ct. 3.1348(a).

12 The purpose of discovery sanctions is “to prevent abuse of the discovery process and correct
13 the problem presented.” *Do v. Super. Ct.* (2003) 109 Cal.App.4th 1210, 1213 (citations omitted).
14 Here, there is no excuse or justification for Pierattini’s refusal to provide further responses to the
15 subject discovery. Plaintiff’s included declaration attests to the efforts expended by Plaintiff to avoid
16 this motion. It is evident from the facts presented that Pierattini will not comply with this authorized
17 method of discovery absent a court order and the imposition of sanctions.

18 In the present case, Plaintiff has incurred and will incur in excess of \$500 in costs and
19 attorney’s fees in connection with this Motion and enforcing this discovery due to filing fees,
20 copying fees, and the cost of my time. Pursuant to Code of Civil Procedure §§ 2023.010, 2023.030,
21 and 2031.310, and the power of this Court to impose monetary sanctions against the losing party on
22 a motion to compel further responses, Plaintiff submits that given Plaintiff’s attempts to avoid
23 having to file this motion, and Pierattini’s lack of compliance, sanctions should properly be awarded
24 to Plaintiff and against Pierattini and his counsel in the amount of \$4,999.99, to property deter such
25 behavior in the future.

1 In the event that Pierattini provides responsive documents and further, Code-Compliant
2 responses after this Motion has been filed, this hearing should still remain on calendar and be heard
3 before the Court in order to grant sanctions for Pierattini's gross misuse of the discovery process.

4 **IX. CONCLUSION**

5 For the foregoing reasons, Plaintiff respectfully requests that this Motion be granted and that
6 this Court issue an Order compelling Pierattini to produce responsive documents and to provide
7 further, Code-compliant responses to Plaintiff's Requests for Production of Documents, Set Two,
8 within thirty (30) days. Plaintiff further requests that this Court issue an Order imposing monetary
9 sanctions on Pierattini and his counsel in the amount of \$4,999.99, or more, payable within thirty
10 (30) days.

11 **DECLARATION OF JOSE DECASTRO**

12 I declare under penalty of perjury under the laws of the State of California that the foregoing is
13 true and correct. Further, where an attorney preparing a motion typically is not a declaring party,
14 requiring a separate declaration from the party, I am a pro se party and an included declaration is
15 therefore proper and there is no code saying otherwise.

16 DATED: March 15, 2024

Respectfully submitted,

17 /s/ Jose DeCastro

Jose DeCastro

18 In Pro Per

19 **CERTIFICATE OF SERVICE**

20 On this day, Plaintiff has sent copies to the only participating defendants by email to Paul
21 Katrinak, attorney for Defendant at katrinaklaw@gmail.com.

22 DATED: March 15, 2024

Respectfully submitted,

23 /s/ Jose DeCastro

24 Jose DeCastro

25 In Pro Per

EXHIBIT 1

1 Jose DeCastro
1258 Franklin St.
2 Santa Monica, CA 90404
310-963-2445
3 chille@situationcreator.com
In Pro Per
4
5
6
7

8 **SUPERIOR COURT OF CALIFORNIA**

9 **COUNTY OF LOS ANGELES**

10
11 JOSE DECASTRO) Case No.: 23SMCV00538
12)
Plaintiff,) **REQUESTS FOR PRODUCTION OF**
vs.) **DOCUMENTS (SECOND SET)**
13)
KATHERINE PETER, et al.) Judge: Hon. H. Jay Ford III
14) Department: O
15) Case Filed: 2/7/2023
Defendants.)
16)

17 **REQUESTING PARTY:** Plaintiff, Jose DeCastro

18 **SET NUMBER:** Second

19 **RESPONDING PARTY:** Defendant Michael Pierattini

20 Pursuant to California Code of Civil Procedure Section 2031.210 et seq., Plaintiff Jose
21 DeCastro requests that Defendant Michael Pierattini produce and/or permit inspection of each of the
22 following categories of documents and electronically stored information within thirty (30) days at
23 chille@situationcreator.com:

24 **ARTICLE I: INSTRUCTIONS.**

- 1 **1.1.** Electronically stored information shall be produced in the following format: searchable PDF
including timestamps for messages.
- 2 **1.2.** If Defendant objects to the production of any document on the grounds of the attorney-client
3 privilege or work product doctrine or any other privilege or doctrine, Defendant shall, on the
4 date responses are due, provide a privilege log that includes the following information for
5 each document:
- 6 (a) The names of each writer, sender, or initiator of each copy of the document
 - 7 (b) The names of each recipient, addressee, or party to whom the document was sent or
8 whom received the document
 - 9 (c) The date of each copy of the document, or an estimate of its date
 - 10 (d) A non-privileged description of the contents of the document
 - 11 (e) The relevant privilege or doctrine and a statement of the basis for the claim
- 12 **1.3.** Unless otherwise indicated, these requests cover the time period from March 1, 2022 to the
13 present.

14 **ARTICLE II. DEFINITIONS.**

- 15 **1.4.** “DOCUMENT” has the same meaning as the definition of “writing” in California Evidence
16 Code Section 250 and includes all written and graphic matter, however produced or
17 reproduced, of any kind or description, whether sent or received or neither, including
18 originals, non-identical copies and drafts, and both sides thereof, including letters,
19 correspondence, memoranda, email, texts, tweets, posts, messages in any digital or electronic
20 format, contracts, photographs, diaries, journals, calendars, logs, notebooks, computer files
21 stored by any means, computer printouts, and includes all DOCUMENTS in your possession,
22 custody, or control that may be stored in or accessible through any cloud-based service.
- 23 **1.5.** “PERSON” means any natural person, entity, firm, corporation, partnership, association,
24 joint venture, or other form of business organization or arrangement, and/or government or
25 government agency.
- 1.6.** “COMMUNICATION” means any exchange or conversation and includes, by example,
those transmitted written letter, memorandum, email, or DOCUMENT of any kind
transmitted from one PERSON to another, by telephone, voicemail, text message, chat, or
any other medium, or in person.
- 1.7.** “Concerning” means constituting, comprising, relating to, referring to, reflecting, evidencing,
or in any way relevant.
- 1.8.** “Associate” refers to any two people that are familiar to each other, including but not limited
to friends, family members, business associates, and vendors.
- 1.9.** “Masshole Troll Mafia” refers to any organization that Katherine Peter founded regardless of
how the organization transformed afterward.
- 1.10.** “YOU” and “YOUR” mean Michael Pierattini and any business entities concerning you.
- 1.11.** The terms “any” and “all” mean “any and all.”
- 1.12.** The singular of any term includes the plural and the plural includes the singular.
- 1.13.** The terms “and” and “or” shall be construed conjunctively or disjunctively as necessary to
make the document request inclusive, rather than exclusive.

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The use of a verb in any tense shall be construed as the use of the verb in all other tenses whenever necessary to bring documents within the scope of the request.

ARTICLE III. REQUESTS.


Request for Production No. 1: All COMMUNICATIONS between YOU and Your attorney(s) regarding the scheduling or planning of the “Deposition of Plaintiff Jose DeCastro” scheduled for January 25, 2023.

Request for Production No. 2: All COMMUNICATIONS between YOU and any party regarding the “Deposition of Plaintiff Jose DeCastro” scheduled for January 25, 2023.

Request for Production No. 3: All receipts for payments made regarding the “Deposition of Plaintiff Jose DeCastro” scheduled for January 25, 2023.

Request for Production No. 4: All receipts for refunds made regarding the “Deposition of Plaintiff Jose DeCastro” scheduled for January 25, 2023

DATED: February 5, 2024


By,


Jose DeCastro
In Pro Per

Please note that I still haven’t received the documents I requested in June 2023 and it is long past your deadline for objections.

CERTIFICATE OF SERVICE

I, Jose DeCastro certify that on January 5, 2024, a copy of the foregoing Plaintiff Jose DeCastro’s Second Set of Requests for Productions of Documents was served by email on Michael Pierattini and his counsel, who has consented to receiving service by email, at pkatrinak@kernanlaw.net. No other parties have made an appearance in this action. I certify under penalty under the laws of the State of California that the foregoing is true and correct.



Jose DeCastro
chille@situationcreator.com

EXHIBIT 2

Jose DeCastro
1258 Franklin St.
Santa Monica, CA 90404
(310) 963-2445
chill@situationcreator.com

March 11, 2024

VIA E-MAIL

Paul Katrinak
9663 Santa Monica Blvd. No. 458
Beverly Hills, California 90210
katrinaklaw@gmail.com

Re: Defendant Michael Pierattini's discovery objections in Jose DeCastro v. Katherine Peter, et al. Case No. 23SMC00538

Dear Mr. Katrinak:

I am in receipt of your "responses" to my discovery requests sent to you on February 5, 2024. Your "responses" are completely improper. Specifically, your "responses" to my requests for production of documents consist primarily of improper objections and contain virtually no responsive information. You are the Defendant. You presumably had some evidence to harass my client with a deposition held during his scheduled trial in a state you know that he didn't reside in. You have not provided a shred of evidence or information and your Answer is devoid of any allegations against me, which I have repeatedly pointed out to you. You cannot simply refuse to participate in discovery by hiding behind dozens of inappropriate objections. This is not how the discovery process works, and your actions are completely prejudicing me.

Your outrageous non-responses to discovery, especially in light of your ambiguous Answer, is sanctionable.

I. YOUR IMPROPER OBJECTIONS

As an initial matter, I want to clarify some of the law as it relates to your objections to my discovery.

A. Relevance, Materiality, Propriety, and Admissibility

Your general objections regarding relevance, materiality, propriety, and admissibility are not well taken. As explained in Brown & Weil, *California Practice Guide: Civil Procedure Before Trial*, The Rutter Group (2017 update) (hereafter "Brown & Weil"):

[8:36] Right to Discovery Liberally Construed: Courts have construed the discovery statutes broadly, so as to *uphold the right to discovery wherever possible*. [*Greyhound Corp. v. Sup.Ct. (Clay)* (1961) 56 C2d 355, 377-378, 15 CR 90, 100 (decided under former law); *Emerson Elec. Co. v. Sup.Ct. (Grayson)* (1997) 16 C4th 1101, 1108, 68 CR2d 883, 886—"Our conclusions in *Greyhound* apply equally to the new discovery

statutes enacted by the Civil Discovery Act of 1986, which retain the expansive scope of discovery”; see *Obregon v. Sup.Ct. (Cimm's, Inc.)* (1998) 67 CA4th 424, 434, 79 CR2d 62, 69 (citing text)]

[8:37] For example, even where the statutes require a showing of “good cause” to obtain discovery (e.g., for court-ordered mental examinations), this term is *liberally* construed—to permit, rather than to prevent, discovery wherever possible. [*Greyhound Corp. v. Sup.Ct. (Clay)*, *supra*, 56 C2d at 377-378, 15 CR at 100]

On the issue of relevance, Brown & Weil adds:

[8:66] “Relevant to Subject Matter”:

[8:66.1] Purpose The first and most basic limitation on the scope of discovery is that the information sought must be relevant to the “subject matter” of the pending action or to the determination of a motion in that action. [CCP § 2017.010] The phrase “subject matter” does not lend itself to precise definition. It is *broader* than relevancy to the issues (which determines admissibility of evidence at trial). [*Bridgestone/Firestone, Inc. v. Sup.Ct. (Rios)* (1992) 7 CA4th 1384, 1392, 9 CR2d 709, 713]

[8:66.1] Purpose: For discovery purposes, information should be regarded as “relevant to the subject matter” if it might reasonably assist a party in *evaluating* the case, *preparing* for trial, or facilitating *settlement* thereof. [*Gonzalez v. Sup.Ct. (City of San Fernando)* (1995) 33 CA4th 1539, 1546, 39 CR2d 896, 901 (citing text); *Lipton v. Sup.Ct. (Lawyers' Mut. Ins. Co.)* (1996) 48 CA4th 1599, 1611, 56 CR2d 341, 347 (citing text); *Stewart v. Colonial Western Agency, Inc.* (2001) 87 CA4th 1006, 1013, 105 CR2d 115, 120 (citing text)]

The objections are improper and are not well taken. As explained in Brown & Weil in relation to the phrase “reasonably calculated”:

“This phrase is more helpful in defining the scope of permissible discovery. It makes it clear that discovery extends to any information that reasonably might lead to other evidence that would be admissible at trial. Thus, the scope of permissible discovery is one of *reason, logic and common sense*. [*Lipton v. Sup.Ct. (Lawyers' Mut. Ins. Co.)* (1996) 48 CA4th 1599, 1611, 56 CR2d 341, 348 (citing text)]”. *Id.* at 8:70.

B. The policy is to favor discovery

The policy is to favor discovery, as Brown & Weil explains:

[8:71] Policy favoring discovery: The “relevance to the subject matter” and “reasonably calculated to lead to discovery of admissible evidence” standards are applied *liberally*. Any doubt is generally resolved in favor of *permitting* discovery, particularly where the precise issues in the case are not yet clearly established. [*Colonial Life & Acc. Ins. Co. v. Sup.Ct. (Perry)* (1982) 31 C3d 785, 790, 183 CR 810, 813, fns. 7-8].

That leading treatise adds:

[8:72] “Fishing trips” permissible: Lawyers sometimes make the objection that opposing counsel are on a “fishing expedition.” But this is *not* a valid ground for refusal to make

discovery. The plain and simple answer is that “fishing expeditions” are expressly authorized by statute—i.e., the Discovery Act provides for discovery of matters “reasonably calculated to *lead* to discovery of admissible evidence.” [CCP § 2017.010 (emphasis added); see *Greyhound Corp. v. Sup.Ct. (Clay)* (1961) 56 C2d 355, 384, 15 CR 90, 104—“The method of ‘fishing’ may be, in a particular case, entirely improper ... But the possibility that it may be abused is not of itself an indictment of the fishing expedition *per se*”; see also *Gonzalez v. Sup.Ct. (City of San Fernando)* (1995) 33 CA4th 1539, 1546, 39 CR2d 896, 901].

C. Attorney-Client Privilege Objections

In many of your responses, you object on grounds of attorney-client privilege. As an initial point, the attorney-client privilege does not apply to you as an In Pro Per party. Attorney-client privilege requires “a confidential communication between client and lawyer.” Evid. Code, § 954. You cannot communicate with yourself.

Additionally, when asserting claims of privilege or attorney work product protection, the objecting party must provide “sufficient factual information” to enable other parties to evaluate the merits of the claim, including a privilege log. *Lopez v. Watchtower Bible & Tract Soc. Of New York, Inc.* (2016) 246 Cal.App.4th 566, 596-597. You must be prepared to explain why this objection is applicable to *every individual* discovery request.

In addition, you must prepare a privilege log that identifies each document withheld in response to the discovery requests and the specific privilege claimed. You have not produced a single document, so presumably, this privilege log would be extensive. The information in the privilege log must be sufficiently specific to allow a determination of whether each withheld document is or is not in fact privileged. As further explained in *Brown & Weil*, a privilege log is required for discovery that is being held back on privilege:

[8:1474.5] Objection based on privilege; “privilege log” may be required: When asserting claims of privilege or attorney work product protection, the objecting party must provide “sufficient factual information” to enable other parties to evaluate the merits of the claim, “including, *if necessary*, a privilege log.” [CCP § 2031.240(c)(1) (emphasis added); *Lopez v. Watchtower Bible & Tract Soc. of New York, Inc.* (2016) 246 CA4th 566, 596-597, 201 CR3d 156, 181—burden to show preliminary facts supporting application of privilege not met where D failed to produce privilege log or identify any specific confidential communications]

As to the contents, that treatise explains:

[8:1474.5a] Required contents of privilege log: As the term is commonly used by courts and attorneys, a “privilege log” identifies each document for which a privilege or work product protection is claimed, its author, recipients, date of preparation, and the *specific* privilege or work product protection claimed. [*Hernandez v. Sup.Ct. (Acheson Indus., Inc.)* (2003) 112 CA4th 285, 291-292, 4 CR3d 883, 888-889, fn. 6; see CCP § 2031.240(c)(2)—Legislative intent to codify concept of privilege log “as that term is used in California case law”]

“The information in the privilege log must be sufficiently specific to allow a determination of whether each withheld document is or is not [in] fact privileged.”

[Wellpoint Health Networks, Inc. v. Sup.Ct. (McCombs) (1997) 59 CA4th 110, 130, 68 CR2d 844, 857; see Catalina Island Yacht Club v. Sup.Ct. (Beatty) (2015) 242 CA4th 1116, 1130, 195 CR3d 694, 704 & fn. 5—privilege log deficient due to failure to describe documents or contents (other than noting they were emails with counsel) since not all communications with attorneys are privileged]

FORM: Privilege Log, see *Form 8:26.2* in Rivera, *Cal. Prac. Guide: Civ. Pro. Before Trial FORMS* (TRG).

Furthermore, a privilege log is due with the objections, Brown & Weil states on the timing:

The Code seems to indicate that if a privilege log is “necessary” to enable other parties to evaluate the merits of a privilege or work product claim, it must be provided by the objecting party with the response to the § 2031.010 inspection demand (i.e., at the time the objection is made). [See CCP § 2031.240(c)(1)—if objection is based on privilege or work product claim, “the response shall provide ... including, if necessary, a privilege log”] *Id.* at 1474.6.

D. Your Attempts to Deftly Evade Discovery are Sanctionable

The way you seek to deftly word what responses you will or will not produce is improper. The law is plain that deftly worded attempts to evade discovery are improper. *Deyo v. Kilbourne* (1978) 84 CA3d 771, 783, 149 CR 499, 509.

II. YOUR IMPROPER DISCOVERY RESPONSES

A. Responses to Requests for Production of Documents

The Response Required for a Request for Production of Documents:

Your “responses” to our document requests are completely improper. As explained in Brown & Weil, your response needs to be one of the following:

- **Agreement to comply:** A statement that the party will comply by the date set for inspection with the particular demand for inspection, testing, etc.; or
- **Representation of inability to comply:** A statement that the party lacks the ability to comply with the particular demand; or
- **Objections:** An objection to all or part of the demand. CCP § 2031.210(a).

Remarkably, you are in essence claiming that every single document request we have served is fully objectionable, and that you are therefore exempt from producing even a single responsive document. This position is outrageous and is an affront to the discovery process. We are entitled to your production of the requested documents. If you want to claim that only part of an item or category demanded is objectionable, your response must contain an agreement to comply with the remainder, or a representation of inability to comply. CCP § 2031.240(a) (General objections to the entire request are unauthorized and constitute discovery misuse; see ¶ 8:1071 (dealing with interrogatories).) *Id.* at 8:1469.

Brown & Weil explains as to what constitutes compliance:

[8:1471] What constitutes “compliance”: Documents must be produced either:

- as they are kept in the usual course of business, or
- sorted and labeled to correspond with the categories in the document demand. CCP § 2031.280(a).

No documents have been produced by you. It is outrageous that you have refused to produce even a single document. You are the Defendant who begged me to sue you so that you could participate in discovery. Instead, you continue to harass me by trying to schedule depositions while I’m in trial and out of state. If you have any responsive documents in your possession, custody, or control, you must produce the documents.

By way of this letter, we hereby demand that you comply with the California discovery statutes and produce all responsive documents and provide proper responses no later than 12:00 p.m. on Friday, March 15, 2024. If you do not promptly withdraw your objections and provide proper responses to our discovery requests, we will file motions to compel your responses to our discovery requests and seek monetary sanctions. Your gamesmanship and outrageous conduct in this matter concerning discovery warrants the imposition of substantial attorney’s fees as sanctions.

I look forward to complete responses, without objection, and the production of documents from you. You are the plaintiff. You must have some basis to be suing my client. If you do not, dismiss my client forthwith.

This letter is not intended, nor should it be construed, as a full recitation of all of the facts in this matter. Additionally, this letter is written without waiver or relinquishment of all of my client’s rights or remedies, all of which are hereby expressly reserved.

Very Truly Yours,



Jose DeCastro



Make a Reservation

JOSE DECASTRO vs KATHERINE PETER

Case Number: 23SMCV00538 Case Type: Civil Unlimited Category: Defamation (slander/libel)

Date Filed: 2023-02-06 Location: Santa Monica Courthouse - Department O

Reservation

Case Name:
JOSE DECASTRO vs KATHERINE PETER

Case Number:
23SMCV00538

Type:
Motion for Sanctions

Status:
RESERVED

Filing Party:
Jose Decastro (Plaintiff)

Location:
Santa Monica Courthouse - Department O

Date/Time:
05/16/2024 8:30 AM

Number of Motions:
1

Reservation ID:
310786113364

Confirmation Code:
CR-VPTBYAZO97G3SXSJT

Fees

Description	Fee	Qty	Amount
Motion for Sanctions	0.00	1	0.00
TOTAL			\$0.00

Payment

Amount:
\$0.00

Type:
NOFEE

Account Number:
n/a

Authorization:
n/a

Payment Date:
1969-12-31

[Print Receipt](#)

[Reserve Another Hearing](#)

[View My Reservations](#)