

1 R. Paul Katrinak, State Bar No. 164057
2 LAW OFFICES OF R. PAUL KATRINAK
3 9663 Santa Monica Blvd., 458
4 Beverly Hills, California 90210
5 Telephone: (310) 990-4348
6 Facsimile: (310) 921-5398

Electronically FILED by
Superior Court of California,
County of Los Angeles
2/13/2024 12:00 AM
David W. Slayton,
Executive Officer/Clerk of Court,
By L. Kulkin, Deputy Clerk

Attorneys for Defendant
Michael Pierattini

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

9 JOSE DECASTRO,)
10)
11 Plaintiff,)
12)
13 v.)
14 KATHERINE PETER; DANIEL CLEMENT;)
15 MICHAEL PIERATTINI; DAVID OMO JR.;)
16 and DOES 1 TO 30, inclusive,)
17 Defendants.)

Case No. 23SMCV00538
Assigned for all purposes to the Honorable
H. Jay Ford, Dept. O

**DECLARATION OF R. PAUL KATRINAK
IN SUPPORT OF DEFENDANT
PIERATTINI'S REPLY TO PLAINTIFF'S
OPPOSITION TO MOTIONS TO
COMPEL AND FOR SANCTIONS**

Date: February 20, 2024
Time: 8:30 a.m.
Dept: O

RES ID: 229069495204

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

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

DECLARATION OF R. PAUL KATRINAK

I, R. Paul Katrinak, declare as follows:

1. I am an attorney duly licensed to practice law before all courts of the State of California. My law firm is counsel for Defendant Michael Pierattini (“Mr. Pierattini”) in this action. The following facts are within my personal knowledge and, if called as a witness herein, I can and will competently testify thereto.

2. Plaintiff Jose DeCastro (“Plaintiff”) holds himself out to be a legal scholar online, and has built his brand on teaching people how to “know their rights” with an emphasis on the Fifth Amendment. Plaintiff’s website is replete with legal analysis of various cases with a significant fixation on *Terry v. Ohio*. Plaintiff is illegally playing a lawyer on line, and, like any pro per, should be held to the same standard as a practicing attorney. Attached hereto as Exhibit “A” are true and correct copies of several pages from Plaintiff’s website, including his sale of “know your rights” paraphernalia, his mission statement, his analysis of court decisions, and his biography stating that he has “studied law.”

3. On January 23, 2024, Plaintiff claims that his criminal trial in Las Vegas was allegedly continued due to an alleged “medical reason”. Plaintiff streamed a nearly 5-hour long livestream to his YouTube channel that very same day as can be seen at this link: <https://www.youtube.com/watch?v=WNBByvd7UQzo>. Attached hereto as Exhibit “B” is a true and correct copy of the Nevada Courts record of Plaintiff’s criminal case, indicating that it was continued on January 23, 2024 “Due to medical reasons”.

4. On January 12, 2024, I sent an extensive meet and confer letter to Plaintiff explaining in detail why his deposition should proceed and if he did not appear I would file a Motion to Compel. Attached hereto as Exhibit “C” is a true and correct copy of my email to Plaintiff containing both meet and confer letters. This is the same email address that the Motions were sent to and all correspondence has been sent to for Plaintiff. Attached hereto as Exhibit “D” is a true and correct copy of my meet and confer letter regarding Plaintiff’s deposition dated January 12, 2024.

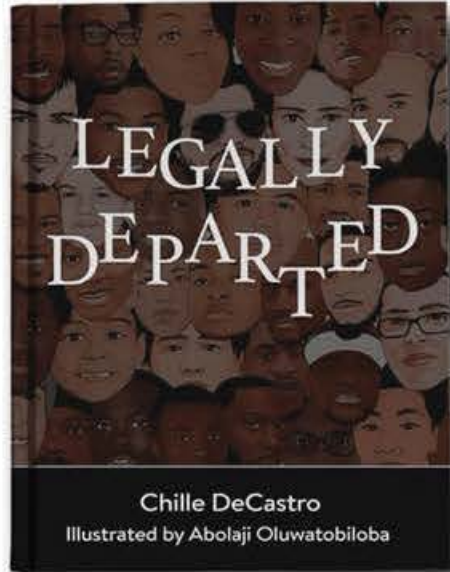
///

EXHIBIT A

A Historical Time Line of Supreme Court Cases

Learn how the cases connect and strip you of your Civil Rights! The more you know, the more you can help!

[BUY NOW](#)



Educate Yourself! 20 Supreme Court Cases that you absolutely must know!

This E-book is for you to understand how Police were given Our Rights through the Supreme Court.

[BUY NOW](#)



Mission Statement

Four Main Objectives:

1. **Overturn Terry v. Ohio:**

The devastating impact of Terry vs. Ohio on the civil liberties of all Americans-, especially if you happen to be a black American– cannot be understated. This ruling (and the laws stemming from it,) effectively and unequivocally places greater value on the “safety” (in fact, greater value is placed not on the actual safety but on the “belief of a threat to” or “fear for” the safety) of members of law enforcement. Police officers with a documented record of racial discrimination and/or allegations of serious misconduct including excessive use of force are protected by and afforded unreasonable liberty under this ruling. The precedents established by Terry v. Ohio have resulted in government-sanctioned murder of Americans. Terry v. Ohio + Graham v. Connor equates to an agent of the Government initiating the contact via “Proactive Policing.” When the subject responds with any degree of consternation, the LEO can then either beat or kill him, invoking Graham’s, “I was in fear for my life” policy.

a.) Until 1964, the primary function of the Supreme Court was to deny the civil liberties of Black Americans. Then, with the passing of the Civil Liberties Act, its ability to do so was effectively curtailed, for the first time in history.

b.) However, the Supreme Court did not wait long to resume its most ardent

objective: to deny Blacks equal treatment and rights under the law. Which is why, in 1968, SCOTUS ruled to place greater worth and more value on “officer’s safety” than on the lives of its citizens; more specifically, on the lives of Black Americans.

d.) Extensions of Terry vs. Ohio (aka: “Death Laws”) i. *South Dakota vs. Opperman* (428 U.S. 364 (1976); ii. *Pennsylvania vs. Mimms*, 434 U.S. 106 (1977); iii. *Illinois vs. Gates*; iv. *Tennessee vs. Garner* (g c); v. *Sitz vs. Michigan State Police* (g c); vi. *Wilson vs. Arkansas*; vii. *Renn vs. United States*; viii. *Atwater vs. City of Lago Vista*; ix. *Arizona vs. Johnson*



Terry must be overturned IMMEDIATELY!

2. **We seek reform of the SCOTUS selection process: Six Districts with Nine Elected Supreme Court Justices for a total of 54 *elected* Supreme Court Justices.**

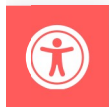
Our current judicial system funds thousands of judges to put Americans in cages, but only 9 to ensure that those justices have ruled fairly and constitutionally. This is not merely unreasonable, it is obscene and must change.

The only thing that our Supreme Court hears cases about is our civil liberties. Because the Supreme Court only hears cases about our civil liberties, we have the right to elect the people who are in charge of our right to life, to liberty, to the pursuit of happiness and to due process. Because history shows that the Supreme Court has not ruled to protect these civil liberties; in fact, quite the opposite. For example: in *Sitz vs. Michigan State Police*, SCOTUS said, “*The empirical evidence shows that this program works.*” In the direct sunlight of this ruling and others, we can see that the Supreme Court *does not* defend our civil liberties.

The main reason for this, we feel, is because there is a barrier between them and us. And that barrier is the President. We do not truly elect our President; **he** is an elitist- from George Washington to Donald Trump- and that is unlikely to change. Then, this elitist chooses another elitist that his political party has vetted and chosen. We feel it is outrageous that we, the People, don’t choose

the judges who are, in fact, both the arbiters and guardians of our civil liberties and propose this alternative in order to institute the “balance of power” that our constitution guarantees.

3. **We intend to champion effective and creative reform; The Montesquieu, Locke, and Rousseau Agencies**



Using the principles of John Jacques Rousseau, John Locke and Montesquieu, we need to apply a system of checks and balances on police immediately by forming two agencies that will be the guardians of liberty and a third agency which will oversee and redraw the congressional district lines. John Locke said “*Show me the character of a man and I’ll show you how much education he has.*” Let’s listen to our enlightenment thinkers. Keep a small portion of police (until we can phase out the entire idea of “law enforcement”), take half or even 60% of their funding and put it into these two new agencies, the “Montesquieu” and the “Locke.” Then, move to a digital detainment system where police no longer arrest individuals. People willingly agree to go with police because they are being filmed. Only the criminally insane or *the most uneducated* will refuse. What that means for those individuals is mandatory education or psychiatric evaluation to determine if they are criminally insane.

1. The first agency is: “Montesquieu.” Every time a police officer has an interaction with anybody, this unit is deployed. (We don’t need 15 cops deployed at the same time, we need four cops and four auditors.) They are on-site auditors who retrieve all the body cam footage; they have the power of subpoena and they have the power to arrest.

2. The second agency is: “Locke.” This agency oversees district attorneys. Their primary function is to review district attorney’s cases. District attorneys in America get paid bonuses based on winning percentage; meaning, they get paid by the number of people that they put in cages. Incentivising incarceration must come to an end *immediately*.

3. The third agency is: “Rousseau” which will oversee and redraw the congressional district lines all across America. We suggest a double-blind study between major institutions which will determine these congressional district lines rather than the current system which is flawed and blatantly corrupt.

4. We intend to pitch a scripted series to Netflix, Hulu, Disney, Amazon...

The Scripted Series shows the story of Policing in America, the past, the present and the future. We will phase out this brand of "policing" in America and create a new brand of "Security and Education"



This content and these new ideas need to reach millions and millions of viewers, not only in the US but across the globe.

Let's not leave people to wonder; let's let them see what digital detainment looks like with a high-end production. In a ten episode scripted series that's pre-written. We want to do three things with the series:

- I. Show the *real* history of the United States.
- II. Show how it is now, today.
- III. Show what a future history looks like with "digital detainment" and education instead of prisons. Where, you can't go home but all you have to do is learn this and you can leave; that's the point. And, it is not going to be a prison, it's going to be a regular city, with a million cameras.

A city where you can have relationships, where you can bring your family, where you can have a job, etc. When you lock a person in a cage for 15, 20 years; they are *ruined*. They are ruined for themselves and they are ruined for us. If somebody is that bad, they can go live in a city where, instead of bars and guards, there are video cameras. But, they get to have interpersonal relationships, they get to have a job, they get to sleep in their own bed, they get to have a fork and a knife; they are treated like humans instead of animals. Only the criminally insane will hurt and kill people when they are put into a regular city.

We won't stop and we won't quit until Terry v Ohio is overturned in our lives. The Next Gen must take the ball to create and pass the 28th Amendment; Breaking SCOTUS up into six elected districts, nine elected Justices, by the people in each district. The currently appointed, nine tyrants would be broken up into six districts; they would have to run for re-election in 6 years. There's no reason that anybody in the world should be appointed to a position in the government of the United

States of America.

Join us!



Chant the chant for change:

“Overturn Terry. Overturn Terry. Overturn Terry.”

DELETELAWZ

Working to bring awareness to laws that infringe on your Constitutional Rights and should be deleted.



Join the Movement

SUPPORT

- Home
- Mission
- Videos
- Downloads
- Shop
- Contact Us

AFFILIATES

- Become an Affiliate
- Affiliate Login

LATEST NEWS



Collins Texts



MiscusGolson



U.S. V. Golson

[Return Policy](#) [Privacy Policy](#)

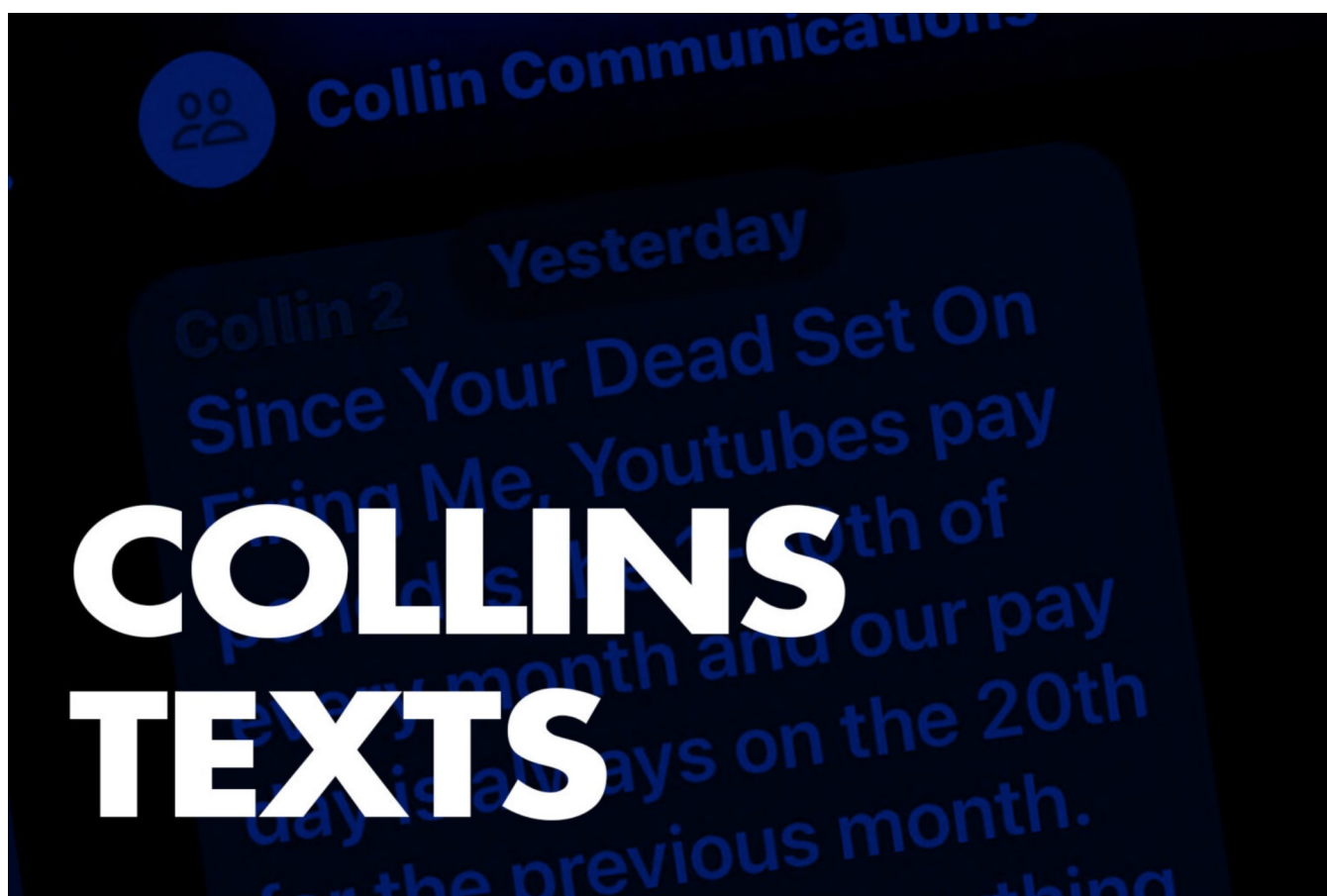
[Terms & Conditions](#) [Contact Us](#)

© 2024 Delete Lawz

Author: Chille DeCastro



Chille DeCastro is Colombian & Irish-German. His Grandfather's side of the family fought in the Revolutionary War. Raised in Alaska, he moved to Los Angeles in the year 2000. After current Chief of Police "Michael Moore" No-Knock-Raided his home in 2001, he hired Robert Shapiro and beat the charges. Since then, he has studied the law and pinpointed that Terry v Ohio is the lynchpin of the police state and prison state.

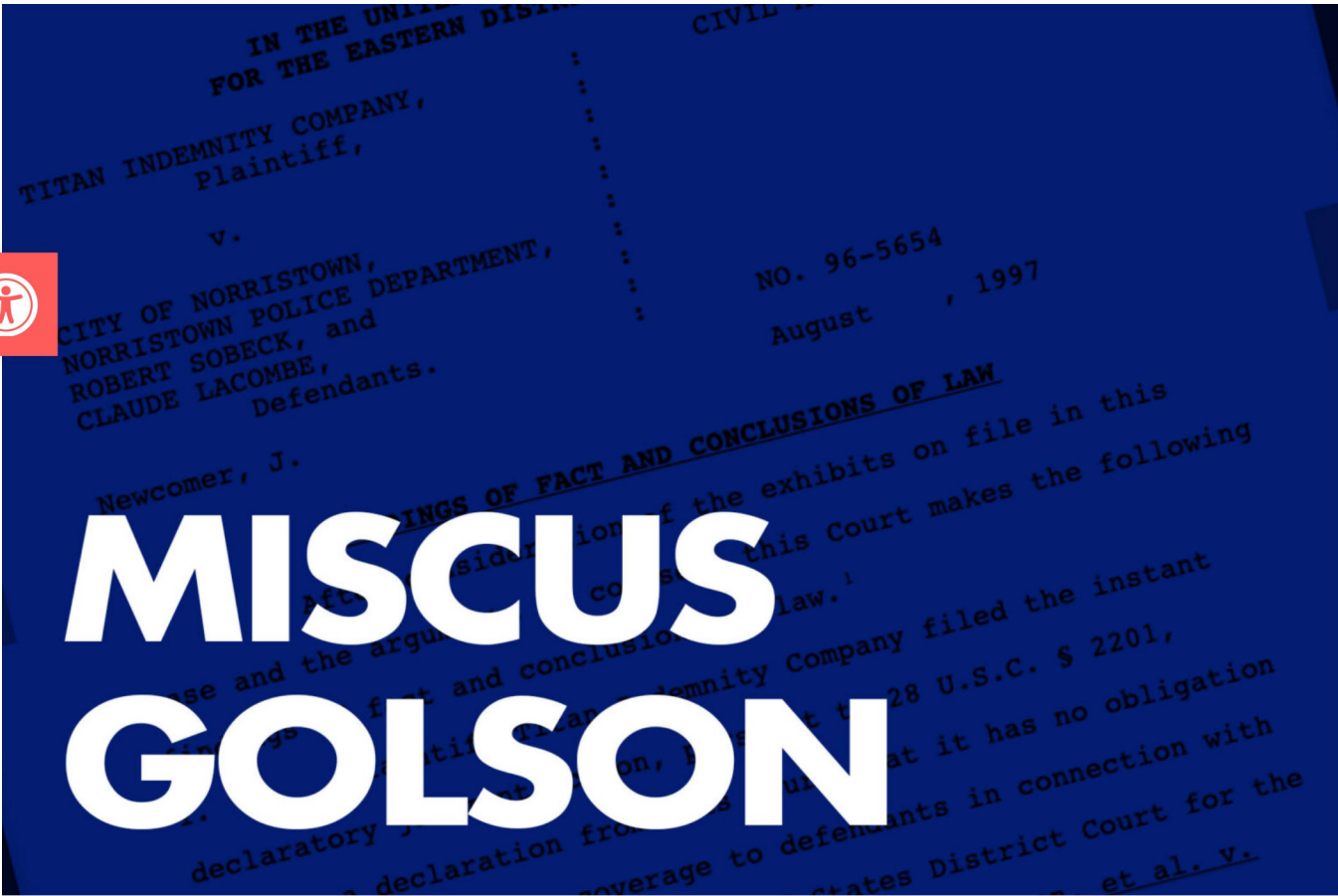


NEWS

Collins Texts

By Chille DeCastro • October 19, 2023

[READ MORE →](#)

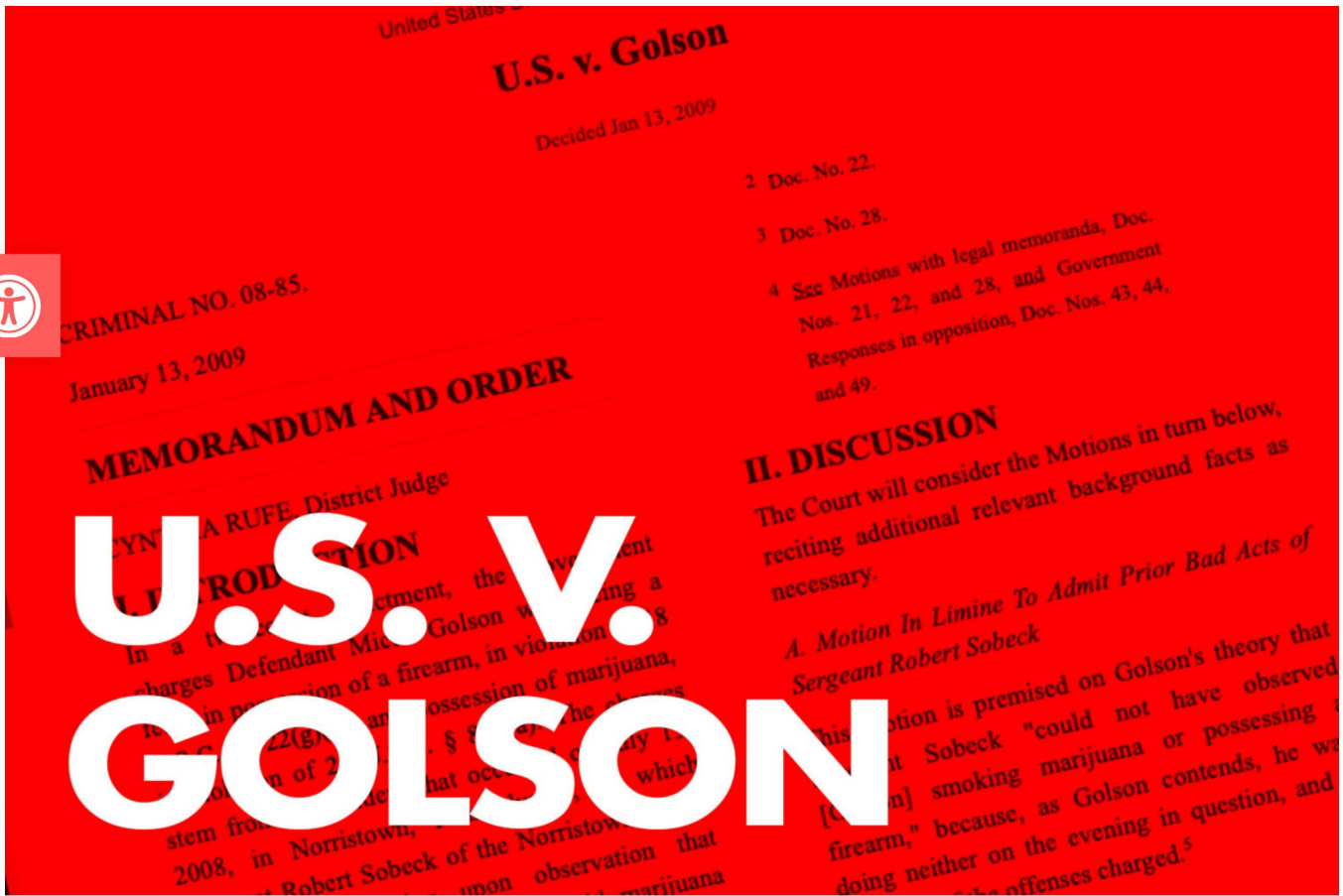


CASES

MiscusGolson

By Chille DeCastro • October 14, 2023

READ MORE →



CASES

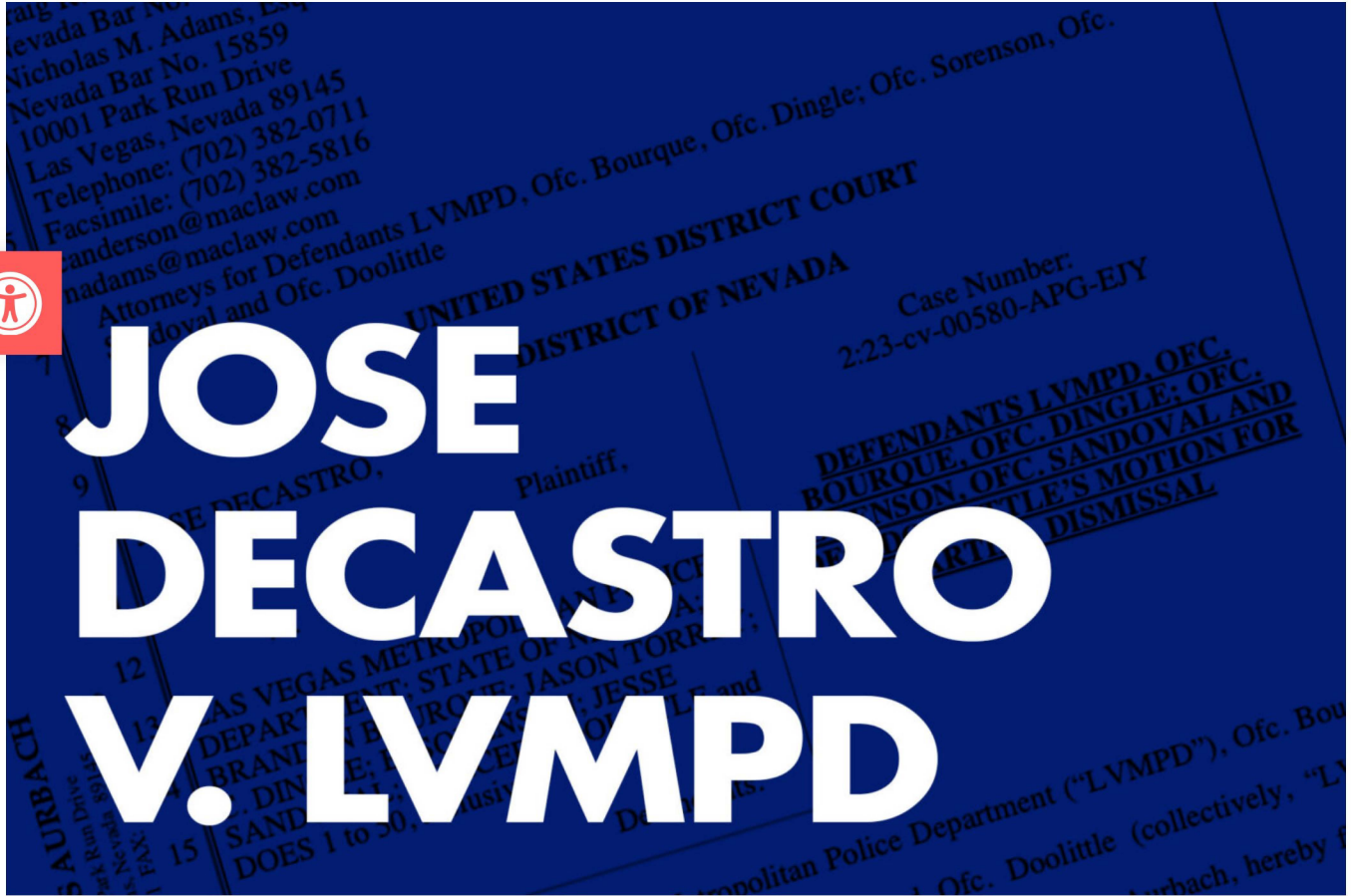
U.S. V Golson

By Chille DeCastro • October 14, 2023

READ MORE →



JOSE DECASTRO V. LVMPD



CASES

Jose DeCastro vs LVMPD

By Chille DeCastro • June 2, 2023

[READ MORE →](#)



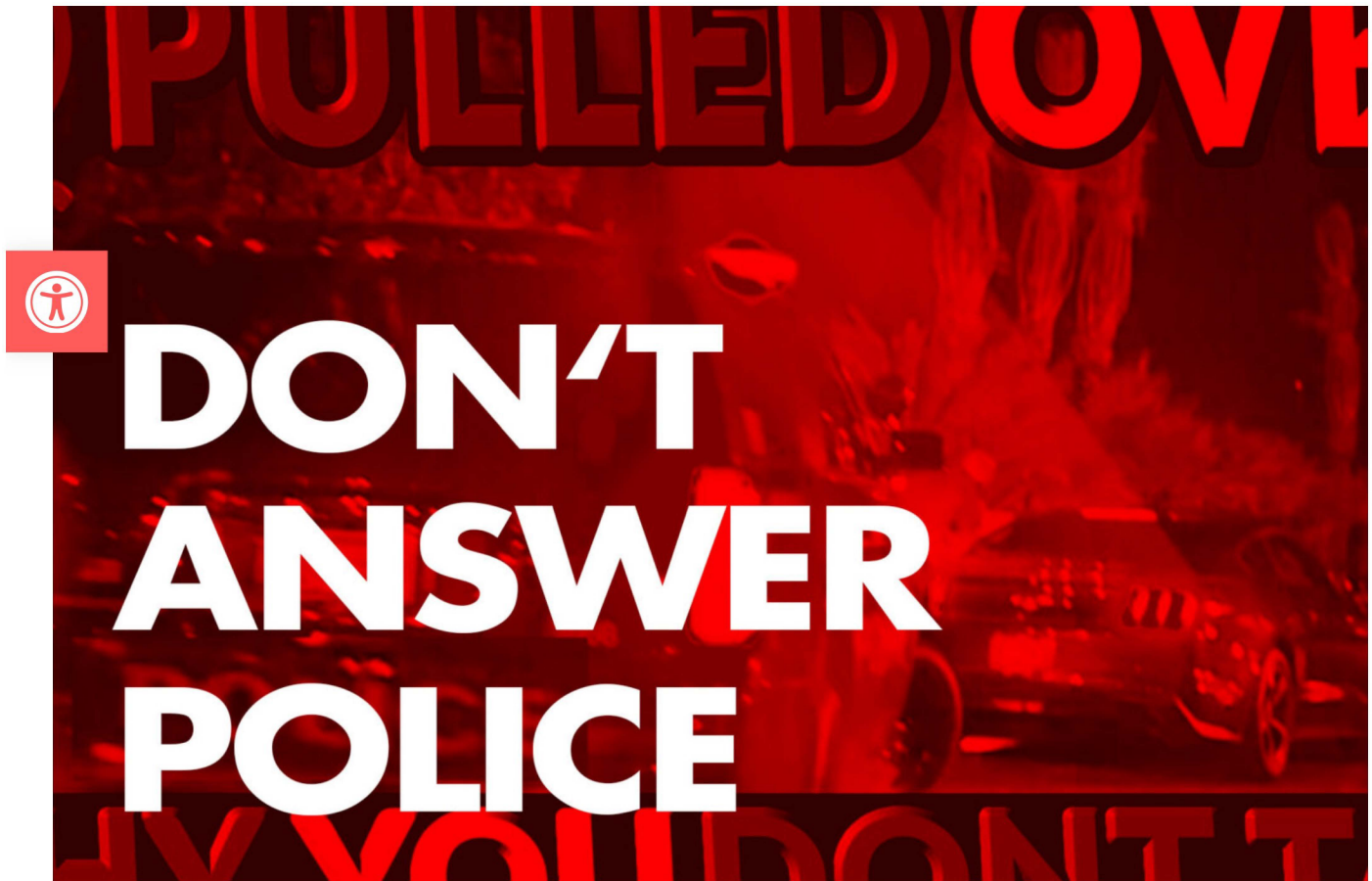
NEWS

Abolish the ATF! But, HOW?

By Chille DeCastro • May 4, 2023

There is a growing call from Americans to abolish the ATF, and for good reason.

[READ MORE →](#)



COURT

WHY YOU DON'T ANSWER POLICE QUESTIONS

By Chille DeCastro • May 3, 2023

Getting pulled over by the police, can be stressful and intimidating experience, especially if you're not sure how to handle the situation.

READ MORE →



CHEROKEE NATION V. D. RODGERS

CASES

Cherokee Nation vs Debraugh Rodgers

By Chille DeCastro • July 26, 2022

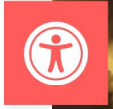
[READ MORE →](#)

**NEWS****Quora Questions I Answer: Jay the Gip**

By Chille DeCastro • October 7, 2021

Quora Questions that I answer and post on DeleteLawZ dot com. This one is about a Hero-Gip and his delusions of how he's a hero & we should all respect him. He's literally hsart. Raymond Smith Question: If the Police are knocking on your door, could the reason be that they do not have a...

READ MORE →



NEWS

Four Basic Missions

By Chille DeCastro • July 22, 2021

I. Overturn Terry v. Ohio The devastating impact of Terry vs. Ohio on the civil liberties of all Americans, especially if you happen to be a black American—cannot be understated. This ruling (and the laws stemming from it) effectively and unequivocally places greater value on the “safety” (in fact, greater value is placed not the...

READ MORE →

DELETEDAWZ

Working to bring awareness to
cases that infringe on your
Constitutional Rights and
should be deleted.



Join the Movement

SUPPORT

- Home
- Mission
- Videos
- Downloads
- Shop
- Contact Us

AFFILIATES

- Become an Affiliate
- Affiliate Login

LATEST NEWS



Collins Texts



MiscusGolson



U.S. V. Golson

- [Return Policy](#)
- [Privacy Policy](#)
- [Terms & Conditions](#)
- [Contact Us](#)

© 2024 Delete Lawz

Home / Shop / Guides / Trifold



Trifold

★★★★★ (45 customer reviews)

~~\$30.00~~ \$20.00

The Trifold contains Constitutional, Federal, and State Laws so you can invoke your 5th Amendment right to be silent immediately without having to speak to the police officer. It also provides a place for you to place your license, registration, and proof of insurance so you can hand everything over together in one convenient package. * Please make sure to check your Spam email folder if you didn't immediately receive your order.

1

Category: [Guides](#)



Description

Reviews (45)

Description



<https://www.youtube.com/watch?v=-RnoZJgPHL4>

Related products



Trifold (Print-At-Home)



\$9.00

[ADD TO CART →](#)

Sale!



5A Cop Card

★★★★★

~~\$30.00~~ \$10.00

ADD TO CART →

DELETEDAWZ



Working to bring awareness to
things that infringe on your
Constitutional Rights and
should be deleted.



Join the Movement

SUPPORT

- Home
- Mission
- Videos
- Downloads
- Shop
- Contact Us

AFFILIATES

- Become an Affiliate
- Affiliate Login

LATEST NEWS



Collins Texts



MiscusGolson



U.S. V Golson

[Return Policy](#) [Privacy Policy](#)

[Terms & Conditions](#) [Contact Us](#)

© 2024 Delete Lawz

Home / Shop / Guides / 5A Cop Card



5A Cop Card

★★★★★ (7 customer reviews)

~~\$30.00~~ \$10.00

Protect yourself by exercising your 5th Amendment rights with this easy-to-use credit card size card.

*Step-by-step tutorial on how to use the Fifth Amendment card can be found on the channel DeleteLawZ on Youtube.

*** Please make sure to check your Spam email folder if you didn't immediately receive your order.**

1

Category: [Guides](#)



Additional information

Reviews (7)

Additional information

Weight .5 lbs

Dimensions *5 × 1 × 1 in*

You may also like...





Trifold (Print-At-Home)



\$9.00

[ADD TO CART →](#)

Related products

Sale!



Trifold



~~\$30.00~~ \$20.00

ADD TO CART →

DELETEDAWZ



Working to bring awareness to
issues that infringe on your
Constitutional Rights and
should be deleted.



Join the Movement

SUPPORT

- Home
- Mission
- Videos
- Downloads
- Shop
- Contact Us

AFFILIATES

- Become an
Affiliate
- Affiliate Login

LATEST NEWS



Collins
Texts



MiscusGolson



U.S. V
Golson

[Return Policy](#) [Privacy Policy](#)

[Terms & Conditions](#) [Contact Us](#)

© 2024 Delete Lawz

EXHIBIT B

REGISTER OF ACTIONS

CASE NO. 23-CR-013015

State of Nevada vs. DECASTRO, JOSE

§
§
§
§
§

Case Type: **Misdemeanor CR**
Date Filed: **03/15/2023**
Location: **JC Department 8**

PARTY INFORMATION

Defendant **DECASTRO, JOSE**
Other Agency Numbers
1669561 Justice Court Scope ID Subject
Identifier

Lead Attorneys
Michael Mee
Retained
702-308-6363(W)

State of Nevada **State of Nevada**

CHARGE INFORMATION

Charges: DECASTRO, JOSE	Statute	Level	Date
1. False stmt to/obstruct pub off [52312]	197.190	Misdemeanor	03/15/2023
2. Resist public officer [52990]	199.280.3	Misdemeanor	03/15/2023

EVENTS & ORDERS OF THE COURT

- OTHER EVENTS AND HEARINGS**
- 03/15/2023 **Original Track Assignment JC08**
- 03/15/2023 **Case Assignment Sent**
Case Assignment Sent
- 03/15/2023 **DA Request for Prosecution**
Request for Prosecution Sent to DA
- 03/29/2023 **Case Assignment Sent**
Case Assignment Sent
- 03/29/2023 **Citation Image**
- 03/29/2023 **Supplemental Documentation Submitted with Citation**
- 03/30/2023 **Media Request for Electronic Coverage**
of Court proceedings filed.
- 04/03/2023 **Media Request for Electronic Coverage Granted**
- 04/03/2023 **Order Regarding Media Request for Electronic Coverage Filed**
- 06/12/2023 **Notice of Appearance**
Notice of Appearance of Defense Counsel
- 06/13/2023 **Arraignment (8:00 AM)** (Judicial Officer Zimmerman, Ann E.)
NO BAIL POSTED
Result: Matter Heard
- 06/13/2023 **Counsel Confirms as Attorney of Record**
M. Mee, Esq.
- 06/13/2023 **Arraignment Completed**
Defense advised of Charges on Criminal Complaint, Waives Reading of Criminal Complaint
- 06/13/2023 **Discovery Given to Counsel in Open Court**
- 06/13/2023 **Early offer received in open court**
Continued for negotiations
- 06/13/2023 **Minute Order - Department 08**
- 06/27/2023 **Negotiations (8:00 AM)** (Judicial Officer Zimmerman, Ann E.)
NO BAIL POSTED
Result: Matter Heard
- 06/27/2023 **Defendant Rejected the State's Offer**
- 06/27/2023 **Plea of Not Guilty Entered**
by Defense
- 06/27/2023 **Minute Order - Department 08**
- 09/01/2023 **Motion**
Motion for Production of Discovery
- 09/06/2023 **Motion (8:00 AM)** (Judicial Officer Zimmerman, Ann E.)
NO BAIL POSTED
Result: Matter Heard
- 09/06/2023 **Motion to Continue - Defense**
by Defense for production of discovery no objection by State- granted
- 09/06/2023 **Future Court Date Stands**
09/12/2023 at 9:30am for Bench Trial
- 09/06/2023 **Minute Order - Department 08**
- 09/12/2023 **Bench Trial (9:30 AM)** (Judicial Officer Zimmerman, Ann E.)
No bail posted
Result: Matter Heard
- 09/12/2023 **Motion to Continue - Defense**
to review additional discovery - No objection by State - Granted
- 09/12/2023 **Bench Trial Date Reset**

09/12/2023 **Minute Order - Department 08**

11/28/2023 **Motion**
Renewed Motion for Discovery

11/30/2023 **Motion** (8:00 AM) (Judicial Officers Pro Tempore, Judge, Jansen, William D.)
No bail posted
Result: Matter Heard

11/30/2023 **Motion**
by Defense for Discovery - State represents all discovery in their possession has been turned over - Denied

11/30/2023 **Comment**
State represents they will be filing a Hill Motion to Continue the Bench Trial as the lead officer is unavailable.

11/30/2023 **Future Court Date Stands**
12/6/23 at 9:30 am for Bench Trial

11/30/2023 **Minute Order - Department 08**

11/30/2023 **Notice of Motion**
State's Notice of Motion and Motion to Continue

12/06/2023 **Bench Trial** (9:30 AM) (Judicial Officer Zimmerman, Ann E.)
No bail posted
Result: Matter Heard

12/06/2023 **Hill Motion by State to Continue - Granted**
Witness unavailable until after the start of the year.

12/06/2023 **Bench Trial Date Reset**

12/06/2023 **Minute Order - Department 08**

01/23/2024 **Bench Trial** (9:30 AM) (Judicial Officer Zimmerman, Ann E.)
No Bail Posted
Result: Matter Continued

01/23/2024 **Motion to Continue - Defense**
Due to medical reasons. No objection by State - Granted

01/23/2024 **Bench Trial Date Reset**
Firm Setting.

01/23/2024 **Minute Order - Department 08**

01/24/2024 **Media Request for Electronic Coverage**
of Court proceedings filed.

01/24/2024 **Order Regarding Media Request for Electronic Coverage Filed**

02/26/2024 **Bench Trial** (9:30 AM) (Judicial Officer Zimmerman, Ann E.)
No Bail Posted

EXHIBIT C



Paul Katrinak <katrinaklaw@gmail.com>

Meet and Confer Letters

1 message

Paul Katrinak <katrinaklaw@gmail.com>
To: Chille DeCastro <chille@situationcreator.com>

Fri, Jan 12, 2024 at 12:00 PM

See attached.

--

Paul Katrinak
Law Offices of R. Paul Katrinak
9663 Santa Monica Blvd., 458
Beverly Hills, California 90210
Tel: (310) 990-4348
Fax: (310) 921-5398

The information contained in this e-mail is intended only for the personal and confidential use of the designated recipient(s) named above. This message may be an attorney-client communication and, as such, is privileged and confidential. If the reader of this message is not the intended recipient, you are hereby notified that you have received this communication in error, and that any review, dissemination, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and delete the original message. Thank you.

2 attachments



PIERATTINI 1-12-24 M&C Letter.pdf
221K



PIERATTINI 1-12-24 Depo M&C Letter.pdf
115K

EXHIBIT D

Law Offices of
R. PAUL KATRINAK
9663 Santa Monica Blvd., No. 458
Beverly Hills, California 90210

R. Paul Katrinak, Esq.
Direct: (310) 990-4348
Fas: (310) 921-5398
E-mail: Katrinaklaw@gmail.com

January 12, 2024

VIA E-MAIL

Jose DeCastro
1258 Franklin St.
Santa Monica, CA 90404
chille@situationcreator.com

Re: Plaintiff's Deposition in *Jose DeCastro v. Katherine Peter, et al.*
Case No. 23SMCV00538

Dear Mr. DeCastro:

I am in receipt of your objections improperly attempting to evade your deposition. Your objections based on your assertion that you do not live within 150 miles of the deposition location are outrageous. In all of your filings thus far, you have listed your address as 1258 Franklin St., Santa Monica, CA 90404. In your complaint, you specifically stated as follows:

8. Plaintiff Jose "Chille/Chelito" DeCastro is, and at all times herein mentioned was, an individual residing in Santa Monica, Los Angeles County, California. Plaintiff operates the YouTube channel "Delete Lawz".

As you note in your objections, California Code Civ. Proc., § 2025.250 allows us to take your deposition either within 75 miles of your residence, or within Los Angeles County and within 150 miles of your residence. You chose to sue in Los Angeles County, and stated that you reside in Los Angeles County. You cannot now claim that you are unable to attend your deposition in Los Angeles County because you do not reside within 150 miles of the deposition location. You are the plaintiff. You filed this lawsuit here. This frivolous objection must be withdrawn.

Furthermore, your objection that our request for production of documents at your deposition is unduly burdensome because it is "frivolous and duplicative" is not well taken. The deposition Notice properly specified with reasonable particularity the materials to be produced by you at your deposition, as required under California Code Civ. Proc., § 2025.220(a)(4). It is common practice for requests for production at deposition to overlap with requests for

Jose DeCastro
Jose DeCastro v. Katherine Peter, et al.

Page 2

production of documents. Your objection is completely improper as it goes against basic discovery procedures and violates California law. Your conduct has slowed this litigation and prejudiced my client. Additionally, your objection stating that you “will not be at the deposition in order to produce these documents” is completely improper and an affront to the Court and the discovery process.

Please be advised that if you do not promptly withdraw your objections and attend your deposition, I will file a Motion to Compel your deposition and the production of documents. I am sending this letter anticipating that we will have complete responses to discovery and documents produced no later than January 19, 2024. Provided we get complete discovery responses and documents, your deposition will be able to proceed on January 25, 2024. Furthermore, if you do not withdraw your objections, I will seek sanctions against you due to your outrageous and prejudicial conduct during the discovery process, including but not limited to recovery of attorney’s fees.

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,



R. Paul Karrinak

EXHIBIT E



Paul Katrinak <katrinaklaw@gmail.com>

Discovery

Paul Katrinak <pkatrinak@kernanlaw.net>
To: Chille DeCastro <chille@situationcreator.com>

Mon, Dec 11, 2023 at 6:26 PM





See attached.

--

Paul Katrinak
The Kernan Law Firm
9663 Santa Monica Blvd., 450
Beverly Hills, California 90210
Tel: (323) 802-1741
Fax: (310) 861-0503

The information contained in this e-mail is intended only for the personal and confidential use of the designated recipient(s) named above. This message may be an attorney-client communication and, as such, is privileged and confidential. If the reader of this message is not the intended recipient, you are hereby notified that you have received this communication in error, and that any review, dissemination, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately by telephone and delete the original message. Thank you.

4 attachments

-  **PIERATTINI RFA Set One to Plaintiff.pdf**
234K
-  **PIERATTINI SROG Set One to Plaintiff Final.pdf**
365K
-  **PIERATTINI RPD Set One to Plaintiff.pdf**
287K
-  **PIERATTINI FROGS Set One to Plaintiff FINAL.pdf**
626K

1 **PROOF OF SERVICE**

2 STATE OF CALIFORNIA
3 COUNTY OF LOS ANGELES

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

7 On February 12, 2024, I served the foregoing document(s) described as:

8 **DECLARATION OF R. PAUL KATRINAK IN SUPPORT OF DEFENDANT
9 PIERATTINI'S REPLY TO PLAINTIFF'S OPPOSITION TO MOTIONS TO
10 COMPEL AND FOR SANCTIONS**

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

12 Jose DeCastro
13 1258 Franklin Street
14 Santa Monica, CA 90404
15 chille@situationcreator.com

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

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

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

24 Executed February 12, 2024, at Los Angeles, California.

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

27 
28 R. Paul Katrinak

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