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8 Attorney for Defendant/Cross-Complainant DARRYL COTTON

9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
10 **COUNTY OF SAN DIEGO**

11 LARRY GERACI, an individual,  
12 Plaintiff,  
13 vs.  
14 DARRYL COTTON, an individual; and  
15 DOES 1 through 10, inclusive,  
16 Defendants.  
17 \_\_\_\_\_  
18 AND RELATED CROSS-ACTION.  
19 \_\_\_\_\_

Case No. 37-2017-00010073-CU-BC-CTL  
**DEFENDANT/CROSS-COMPLAINANT DARRYL COTTON'S RESPONSES TO SUPPLEMENTAL INTERROGATORIES (SET ONE)**  
Dept: C-73  
Judge: The Hon. Joel R. Wohlfeil  
Complaint filed: March 21, 2017  
Trial Date: June 28, 2019

20 **PROPOUNDING PARTY: Plaintiff/Cross-Defendant, LARRY GERACI**

21 **RESPONDING PARTY: Defendant/Cross-Complainant, DARRYL COTTON**

22 **SET NO: ONE (1)**

23 Defendant/Cross-Complainant DARRYL COTTON ("Responding Party") serves these Objections  
24 and Responses to Plaintiff/Cross-Defendant's Requests for Supplemental Interrogatories pursuant to Code  
25 of Civil Procedure section 2030, et seq.  
26  
27  
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**DEFENDANT/CROSS-COMPLAINANT DARRYL COTTON'S RESPONSES TO SUPPLEMENTAL INTERROGATORIES (SET ONE)**

**PRELIMINARY STATEMENT**

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2 Each response is given subject to all appropriate objections (including but not limited to objections  
3 to relevancy) which would require the exclusion of any statement herein if the request or interrogatory  
4 were asked of, or any statement contained herein were made by, a witness present and testifying in court.  
5 Any and all such objections, and the grounds therefor, are expressly reserved and may be interposes at the  
6 time of the trial. Further, except for the explicit facts admitted herein, no admission of any nature is to be  
7 implied or inferred.  
8

9 Responding party has not fully completed his investigation of the facts, discovery, or preparation  
10 for trial. It is anticipated that further discovery, investigation, legal research and analysis will lead to new  
11 facts, add meaning to known facts and establish entirely new factual conclusions and legal contentions.  
12 The foregoing may lead to substantial additions to, changes in, or variation of these responses.

13 Accordingly, these responses are based upon only such information reasonably available, known  
14 and recalled at this time. All responses are made without prejudice to Responding Party’s right to produce,  
15 at the time of trial, evidence of any fact which Responding Party may later discover, recall, or later  
16 determine to be material.  
17

18 Responding Party objects to these interrogatories in their entirety to the extent they call for  
19 Responding Party to discover information not within his possession, custody or control, and/or information  
20 equally available to Propounding Party.

21 Responding Party objects to the interrogatories in their entirety to the extent they are overly broad,  
22 seek information that is not relevant to the subject matter of this action, and/or are not reasonably  
23 calculated to lead to the discovery of admissible evidence.  
24

25 Responding Party objects to the interrogatories in their entirety to the extent they are unreasonably  
26 burdensome, oppressive and harassing and requires the adoption of assumption which is improper.

27 The preliminary statement is expressly incorporated by reference into each response to  
28

**DEFENDANT/CROSS-COMPLAINANT DARRYL COTTON’S RESPONSES TO SUPPLEMENTAL  
INTERROGATORIES (SET ONE)**

1 interrogatory below.

2 Discovery is continuing and Responding Party reserves the right to amend these responses at a later  
3 date to incorporate later discovered facts and/or documents.

4 **OBJECTIONS AND RESPONSES TO SUPPLEMENTAL INTERROGATORIES**

5 **SUPPLEMENTAL INTERROGATORY 1:**

6 Please review your answers to each set of interrogatories previously served on you in this action by  
7 Plaintiff/Cross-Defendant LARRY GERACI. If for any reason any answer is no longer correct and  
8 complete, identify the answer and produce whatever information or documents are necessary to make it  
9 correct and complete as of this date.  
10

11 **RESPONSE TO SUPPLEMENTAL INTERROGATORY 1:**

12 All responses are true and correct.  
13  
14

15 DATED: May 31, 2019

THE LAW OFFICE OF JACOB AUSTIN

17 By Jacob P. Austin  
18 JACOB P. AUSTIN  
19 Attorney for Defendant/Cross-Complainant DARRYL COTTON  
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**DEFENDANT/CROSS-COMPLAINANT DARRYL COTTON'S RESPONSES TO SUPPLEMENTAL  
INTERROGATORIES (SET ONE)**