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10 Attorneys for Plaintiffs,
11 CENTRAL COAST CONSULTING, LLC.,
12 HSAKG CONSULTING, INC.,
SLOIG, INC., CCCIG III, INC; and
13 SLO INVESTMENT GROUP III, INC.

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
15 **FOR THE COUNTY OF SAN LUIS OBISPO**

17 CENTRAL COASTAL CONSULTING, LLC, a)
18 California limited liability company, HSAKG)
CONSULTING, INC., a California corporation,)
19 SLOIG, INC., a California corporation,)
CCCIG III, INC., a California corporation, and)
20 SLO INVESTMENT GROUP III, INC., a)
California corporation,)

21 Plaintiffs,

22 vs.

23 ANNA MARIE GABRIEL, an individual,)
24 KRISTA KOENIG, an individual,)
MOHAMMAD REZA SAADATMANDI,)
25 an individual, A.G. HARVEST, INC., a)
California corporation, CAROLYN MARIE)
26 DOWNEY, an individual, and DOES 1-100,)

27 Defendants.)

Case No.: 19CV-0126

**PLAINTIFF CENTRAL COAST
CONSULTING, LLC'S REQUEST FOR
PRODUCTION OF DOCUMENTS TO
DEFENDANT ANNA MARIE GABRIEL**

1 Propounding Party: Plaintiff CENTRAL COAST CONSULTING, LLC

2 Responding Party: Defendant ANNA MARIE GABRIEL

3 Set No. ONE

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6 Pursuant to California Code of Civil Procedure Section 2031 *et seq.*, Plaintiff CENTRAL
7 COAST CONSULTING, LLC demands that Defendant ANNA MARIE GABRIEL respond, under
8 oath, to the following Request for Production of Documents within thirty (30) days, and produce all
9 responsive documents to the offices of Glick Haupt Marino LLP at 1315 Santa Rosa Street, San Luis
10 Obispo, CA 93401. The Definitions relating to the Requests are found below.

11 **DEFINITIONS**

12 The following Definitions apply to this set of Request for Production of Documents:

13 1. The terms “YOU” and “YOUR,” as used herein, shall mean Defendant ANNA
14 MARIE GABRIEL, or anyone acting in concert with “YOU” or on “YOUR” behalf.

15 2. The term “HUASNA PROPERTY”, as used herein, shall refer to that certain real
16 property commonly known as and located at 6135 Huasna Townsite Road, Arroyo Grande, California.

17 3. The term “CENTRAL COASTAL CONSULTING, LLC”, as used herein, shall mean
18 Plaintiff CENTRAL COASTAL CONSULTING, LLC, a California limited liability company, or
19 anyone acting in concert with CENTRAL COASTAL CONSULTING, LLC or on CENTRAL
20 COASTAL CONSULTING, LLC’S behalf.

21 4. The term “HSAKG CONSULTING, INC.”, as used herein, shall mean Plaintiff
22 HSAKG CONSULTING, INC., a California corporation, or anyone acting in concert with HSAKG
23 CONSULTING, INC. or on HSAKG CONSULTING, INC.’S behalf.

24 5. The term “SLOIG, INC.”, as used herein, shall mean Plaintiff SLOIG, INC., a
25 California corporation, or anyone acting in concert with SLOIG, INC. or on SLOIG, INC.’S behalf.

26 6. The term “CCCIG III, INC.”, as used herein, shall mean Plaintiff CCCIG III, INC., a
27 California corporation, or anyone acting in concert with CCCIG III, INC. or on CCCIG III, INC.’S
28 behalf.

1 7. The term "SLO INVESTMENT GROUP III, INC.", as used herein, shall mean
2 Plaintiff SLO INVESTMENT GROUP III, INC., a California corporation, or anyone acting in concert
3 with SLO INVESTMENT GROUP III, INC. or on SLO INVESTMENT GROUP III, INC.'S behalf.

4 8. The term "SLO GROW", as used herein, shall mean SLO GROW, LP, a California
5 limited partnership, or anyone acting in concert with SLO GROW or on SLO GROW'S behalf.

6 9. The term "DOCUMENT" as used herein shall refer to any means of writing, any
7 reduction to tangible form, including computer memory or magnetic, optical or other means of
8 memory or storage of communications, information, or data, including any written, recorded, or
9 filmed graphic matter of any kind or nature, however produced or reproduced, including originals,
10 drafts, or non-identical copies, wherever located. The term DOCUMENT shall include, but is not
11 limited to, books, contracts, agreements, proposals, correspondence, computer tapes, computer discs
12 (whether magnetic or optical), keypunch cards, electronic mail ("e-mail") entries, memoranda,
13 diaries, notes, reports, spreadsheets, matrices, charts, bulletins, printed forms, telegraphic
14 communications, pleadings and other legal papers, telexes, telegrams, teletypes, facsimile
15 reproductions or "faxes," factual compilations, data compilations, statistical compilations, plans,
16 diagrams, drawings, journals, change orders, studies, surveys, sketches, art work, graphics, check
17 ledgers, catalogues, brochures, pamphlets, press releases, advertisements, invoices, audit reports,
18 audit workpapers, minutes, photographs, microfilm, microfiche, computer printouts, film, newspaper
19 clippings, personnel files, quotes, stenographic notes, telephone records, schedules, bids, voice
20 recordings, messages and transcriptions. This definition shall apply to all DOCUMENTS on the
21 particular subject in your possession, custody, or control, or that of your attorneys, agents, employees,
22 officers, directors, or representatives, irrespective of whom generated, prepared, or signed the
23 DOCUMENTS.

24 10. The term "COMMUNICATION" or "COMMUNICATE" shall mean and refer to
25 all forms of information exchanged, whether written or oral, by letter, telephone, facsimile, e-mail or
26 other mode of transmission.

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1 **REQUEST FOR PRODUCTION OF DOCUMENTS**

2 **REQUEST FOR PRODUCTION NO. 1:**

3 All DOCUMENTS relating to, referring to or constituting any contracts between YOU and
4 Plaintiff CENTRAL COAST CONSULTING, LLC relating to the development of a cannabis
5 cultivation facility on the HUASNA PROPERTY.

6 **REQUEST FOR PRODUCTION NO. 2:**

7 All DOCUMENTS relating to, referring to or constituting any contracts between YOU and
8 Plaintiff HSAKG CONSULTING, INC. relating to the development of a cannabis cultivation facility
9 on the HUASNA PROPERTY.

10 **REQUEST FOR PRODUCTION NO. 3:**

11 All DOCUMENTS relating to, referring to or constituting any contracts between YOU and
12 Plaintiff SLOIG, INC. relating to the development of a cannabis cultivation facility on the HUASNA
13 PROPERTY.

14 **REQUEST FOR PRODUCTION NO. 4:**

15 All DOCUMENTS relating to, referring to or constituting any contracts between YOU and
16 Plaintiff CCCIG III, INC. relating to the development of a cannabis cultivation facility on the
17 HUASNA PROPERTY.

18 **REQUEST FOR PRODUCTION NO. 5:**

19 All DOCUMENTS relating to, referring to or constituting any contracts between YOU and
20 Plaintiff SLO INVESTMENT GROUP III, INC. relating to the development of a cannabis cultivation
21 facility on the HUASNA PROPERTY.

22 **REQUEST FOR PRODUCTION NO. 6:**

23 All DOCUMENTS relating to, referring to or constituting any contracts between YOU and
24 Defendant Krista Koenig relating to the development of a cannabis cultivation facility on the
25 HUASNA PROPERTY.

26 **REQUEST FOR PRODUCTION NO. 7:**

27 All DOCUMENTS relating to, referring to or constituting any contracts between YOU and
28 SLO GROW relating to the development of a cannabis cultivation facility on the HUASNA

1 PROPERTY.

2 **REQUEST FOR PRODUCTION NO. 8:**

3 All DOCUMENTS relating to, referring to or constituting any COMMUNICATIONS
4 between YOU and CENTRAL COAST CONSULTING, LLC relating to the development of a
5 cannabis cultivation facility on the HUASNA PROPERTY.

6 **REQUEST FOR PRODUCTION NO. 9:**

7 All DOCUMENTS relating to, referring to or constituting any COMMUNICATIONS
8 between YOU and HSAKG CONSULTING, INC. relating to the development of a cannabis
9 cultivation facility on the HUASNA PROPERTY.

10 **REQUEST FOR PRODUCTION NO. 10:**

11 All DOCUMENTS relating to, referring to or constituting any COMMUNICATIONS
12 between YOU and SLOIG, INC. relating to the development of a cannabis cultivation facility on the
13 HUASNA PROPERTY.

14 **REQUEST FOR PRODUCTION NO. 11:**

15 All DOCUMENTS relating to, referring to or constituting any COMMUNICATIONS
16 between YOU and CCCIG III, INC. relating to the development of a cannabis cultivation facility on
17 the HUASNA PROPERTY.

18 **REQUEST FOR PRODUCTION NO. 12:**

19 All DOCUMENTS relating to, referring to or constituting any COMMUNICATIONS
20 between YOU and SLO INVESTMENT GROUP III, INC. relating to the development of a cannabis
21 cultivation facility on the HUASNA PROPERTY.

22 **REQUEST FOR PRODUCTION NO. 13:**

23 All DOCUMENTS relating to, referring to or constituting any COMMUNICATIONS
24 between YOU and Defendant Krista Koenig relating to the development of a cannabis cultivation
25 facility on the HUASNA PROPERTY.

26 **REQUEST FOR PRODUCTION NO. 14:**

27 All DOCUMENTS relating to, referring to or constituting any COMMUNICATIONS
28 between YOU and SLO GROW relating to the development of a cannabis cultivation facility on the

1 HUASNA PROPERTY.

2 **REQUEST FOR PRODUCTION NO. 15:**

3 All DOCUMENTS relating to, referring to or constituting any COMMUNICATIONS
4 between YOU and William Hales relating to the development of a cannabis cultivation facility on the
5 HUASNA PROPERTY.

6 **REQUEST FOR PRODUCTION NO. 16:**

7 All DOCUMENTS relating to, referring to or constituting any COMMUNICATIONS
8 between YOU and Mike Spangler relating to the development of a cannabis cultivation facility on the
9 HUASNA PROPERTY.

10 **REQUEST FOR PRODUCTION NO. 17:**

11 All DOCUMENTS relating to, referring to or constituting any COMMUNICATIONS
12 between YOU and Brian Alexander relating to the development of a cannabis cultivation facility on
13 the HUASNA PROPERTY.

14 **REQUEST FOR PRODUCTION NO. 18:**

15 All DOCUMENTS relating to, referring to or constituting any COMMUNICATIONS
16 between YOU and Grant Kreft relating to the development of a cannabis cultivation facility on the
17 HUASNA PROPERTY.

18 **REQUEST FOR PRODUCTION NO. 19:**

19 All DOCUMENTS relating to, referring to or constituting any COMMUNICATIONS
20 between YOU and Jason Gable relating to the development of a cannabis cultivation facility on the
21 HUASNA PROPERTY.

22 Dated: August 27, 2021

23 **GLICK HAUPT MARINO LLP**

24 By: 

25 Shane R. Kennedy
26 Attorneys for CENTRAL COAST
27 CONSULTING, LLC., HSAKG
28 CONSULTING, INC., SLOIG, INC., CCCIG
III, INC; and SLO INVESTMENT GROUP
III, INC.