

1 ROB BONTA  
Attorney General of California  
2 HARINDER KAPUR  
Senior Assistant Attorney General  
3 MICHAEL J. YUN (SBN 292587)  
ETHAN A. TURNER (SBN 294891)  
4 Deputy Attorneys General  
1300 I Street, Suite 125  
5 P.O. Box 944255  
Sacramento, CA 94244-2550  
6 Telephone: (916) 210-7898  
Fax: (619) 645-2061  
7 E-mail: Michael.Yun@doj.ca.gov  
*Attorneys for Plaintiff California*  
8 *Department of Cannabis Control*

EXEMPT FROM FILING FEES  
GOV. CODE, § 6103

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
10 COUNTY OF LOS ANGELES  
11 NORTH VALLEY DISTRICT – CHATSWORTH COURTHOUSE

13 CALIFORNIA DEPARTMENT OF  
14 PUBLIC HEALTH AND BUREAU  
15 OF CANNABIS CONTROL,

16 Plaintiffs,

17 v.

18 VERTICAL BLISS, INC., KUSHY  
PUNCH, INC., CONGLOMERATE  
19 MARKETING, LLC, MORE  
AGENCY, INC., RUBEN KACHIAN  
20 aka RUBEN CROSS, ARUTYUN  
BARSAMYAN, KEVIN HALLORAN,  
21 MIKE A. TOROYAN, and DOES 1  
through 30, inclusive,

22 Defendant

Case No. 20CHCV00560

**COST DECLARATION OF DEPUTY  
ATTORNEY GENERAL MICHAEL YUN  
IN SUPPORT OF MOTION TO COMPEL  
RESPONSES AND REQUEST FOR  
SANCTIONS AS TO KUSHY PUNCH,  
INC.**

Date: May 19, 2022 (To be heard on  
May 26, 2022 – Six Motions)  
Time: 8:30 a.m.  
Dept: F49  
Judge: The Honorable Stephen P. Pfahler

Trial Date: June 13, 2022  
Action Filed: September 23, 2020

**RESERVATION NO. 095987213523**

1 I, Michael Yun declare as follows:

2 1. I am an attorney duly licensed to practice law before the Courts of the State of  
3 California. I am a Deputy Attorney General assigned to represent the Plaintiff in the above  
4 entitled matter. I have personal knowledge of the information set forth herein below, all of which  
5 is true and correct of my own personal knowledge and belief that the following evidence,  
6 declarations, exhibits and writings are true and correct. If called as a witness in this proceeding, I  
7 could truthfully testify to the following:

8 2. Plaintiff has requested that the Court award \$2,318.54 in sanctions as to each of the  
9 six Defendants against whom the Motions to Compel Further Responses have been concurrently  
10 filed—(1) Vertical Bliss, Inc., (2) Kushy Punch, Inc., (3) Conglomerate Marketing, LLC, (4)  
11 More Agency, Inc., (5) Arutyun Barsamyan, and (6) Mike Toroyan. This equates to a combined  
12 total of \$13,911.25 in monetary sanctions for these motions. The request is based on the number  
13 of hours worked by myself, co-counsel, a supervisor, and a paralegal/Senior Legal Analyst as a  
14 direct consequence of Defendant's prolonged and repeated failure to provide Code of Civil  
15 Procedure compliant responses to Plaintiff's discovery requests, as required, and the multiple  
16 attempts made to obtain such responses, and the time spent preparing the Motion to Compel  
17 Further Responses, and in seeking an order compelling code compliant responses.

18 3. Four Department of Justice staff members have participated in the attempt to resolve  
19 this discovery matter and to seek an order to compel discovery: Senior Assistant Attorney  
20 General Harinder Kapur, Senior Legal Analyst Helen Koh, Deputy Attorney General Ethan  
21 Turner, and myself.

22 a. Senior Assistant Attorney General Harinder Kapur's hourly billing rate is \$220.  
23 Ms. Kapur undertook 0.50 hour of work as a consequence of Defendant Kushy  
24 Punch, Inc.'s prolonged and repeated failures to provide Code of Civil  
25 Procedure compliant responses to Plaintiff's discovery requests. The cost of  
26 Ms. Kapur's work to the client amounted to \$110.00.

27 b. Senior Legal Analyst Helen Koh has an hourly billing rate of \$205 per hour.

28 Ms. Koh worked 0.25 hour as a consequence of Defendant Kushy Punch, Inc.'s

1 prolonged and repeated failures to provide Code of Civil Procedure compliant  
2 responses to Plaintiff's discovery requests and her total billing for such work  
3 amounts to \$51.25.

4 c. Deputy Attorney General Ethan Turner's hourly billing rate is \$220. Mr. Turner  
5 undertook 22.75 hours of work as a consequence of Defendant's prolonged and  
6 repeated failures to provide Code of Civil Procedure compliant discovery  
7 responses. The cost of Mr. Turner's work to the clients amounted to \$5,005.00.

8 d. I spent 36.75 hours preparing the six (6) motions to compel further discovery  
9 responses and other accompanying documents including reviewing and  
10 compiling more than 1,200 pages of exhibits used in the six (6) Declarations of  
11 Ethan Turner in Support of the Motions to Compel Further Responses. My  
12 hourly billing rate is \$220, so the total costs incurred for the work which I have  
13 had to undertake to date as a consequence of Defendant Kushy Punch, Inc.'s  
14 prolonged and repeated failures to provide Code of Civil Procedure compliant  
15 responses to interrogatories, to requests for production, and to requests for  
16 admissions is \$8,085.00.

17 e. Collectively, as of the date of this filing, \$13,251.25 in legal service fees were  
18 incurred in attempting to elicit required Code of Civil Procedure compliant  
19 discovery responses.

20 f. Additionally, I intend to appear remotely at the hearing(s) reserved for May 26,  
21 2022, and anticipate spending an additional three hours of billable hours to  
22 review any opposition, to prepare for the hearing, and appear at the hearing  
23 itself. This anticipated additional time will probably be less than that which will  
24 actually be incurred and if this turns out to be a significant underestimation, a  
25 supplemental declaration with documentation will be filed ahead of the hearing.  
26 This anticipated time will also be charged at \$220 per hour and will total  
27 \$660.00.  
28

1           4.     The Office of the Attorney General maintains time records in a central computer  
2 system. Attorneys and Senior Legal Analysts directly input their time into preset descriptive  
3 categories listed in the timekeeping software. Attached to this Cost Declaration as Exhibit 1 is a  
4 true and correct copy of the statement for attorney and paralegal services rendered for this matter  
5 prepared at my request by the Department of Justice, Office of the Attorney General.  
6 Attorney/client privileged information, attorney work product, and descriptions of work  
7 performed that are unrelated to the motion to compel further discovery responses have been  
8 redacted from the report. Where entire entries are redacted, we are not requesting to recover costs  
9 for that entry. The smallest increment of time used by the California Department of Justice,  
10 Office of the Attorney General, to bill its clients is 0.25, referring to 15 minutes or less. I have  
11 reviewed the report for accuracy.

12           5.     Attached to this Cost Declaration as Exhibit 2 is a true and correct copy of the  
13 statement for attorney services rendered for this matter by co-counsel Deputy Attorney General  
14 Ethan Turner whose history of work on this matter precedes the date range in Exhibit 1. This was  
15 also prepared at my request by the Department of Justice, Office of the Attorney General.  
16 Attorney/client privileged information, attorney work product, and descriptions of work  
17 performed that are unrelated to the motion to compel further discovery responses have been  
18 redacted from the report. Where entire entries are redacted, we are not requesting to recover costs  
19 for that entry. I have reviewed the report for accuracy.

20           6.     Therefore, the total attorney and legal analyst hours reflected in the “Transaction  
21 Detail for Matter(s): SA2020800072” Reports for which compensation is sought are 60.25 hours,  
22 plus the anticipated time discussed below. “SA2020800072” is the Office of the Attorney  
23 General’s internal matter identification number for the current case.

24           7.     Based on the above, the total costs that will be incurred by Plaintiff by the time of the  
25 hearing as a consequence of Defendant’s prolonged and repeated failures to provide Code of Civil  
26 Procedure compliant responses to Plaintiff’s discovery requests and failure to meet and confer to  
27 \$13,911.25, one sixth of which is \$2,318.54.

28     ///

1  
2 This declaration is executed under penalty of perjury under the laws of the State of  
3 California this 3rd day of February, 2022, at Los Angeles, California.  
4

5 

6 MICHAEL J. YUN  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

# **Exhibit 1**



## Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Harinder K. Kapur	Attorney					
		1/5/22	Gen-06	Communication with Other Party	Meet and Confwer with opposing counsel.	0.50
Harinder K. Kapur - Total						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Helen Koh	Paralegal					
			2/1/22	Gen-12	Discovery-Offensive	Read, reviewed, and responded to DAG Yun's emails regarding motion to compel discovery cost declaration.



Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Helen Koh - Total						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]





Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Michael Yun	Attorney					



Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Michael Yun	Attorney					
		1/5/22	Gen-06	Communication with Other Party	Attended teleconference with opposing counsel Margarita Salazar to discuss defendants' insufficient responses to discovery request and setting up mediation attempt.	0.50



Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Michael Yun	Attorney					



Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Michael Yun	Attorney					



## Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Michael Yun	Attorney	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		1/14/22	Gen-15	Other Submission/ Motion/ Appearance	Made strategy outline for motions to compel against four (4) business defendants for compelling production of records and code compliant responses to requests for interrogatories and admissions; began reviewing prior correspondences with opposing counsels on ProLaw and documents served upon Defendants.	1.75
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]





## Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Michael Yun	Attorney	1/18/22	Gen-15	Other Submission/ Motion/ Appearance	Email communication with co-counsel DAG Ethan Turner regarding exhibits in Declaration in Support of Motion to Compel.	0.25
		1/18/22	Gen-15	Other Submission/ Motion/ Appearance	Reviewed documented prior correspondences with opposing counsels and documents served upon Defendants to be used as exhibits in DAG Declaration in support of motions to compel as to business defendants.	2.00
		1/18/22	Gen-15	Other Submission/ Motion/ Appearance	Worked on Motions to Compel against four (4) defendants and Declaration of DAG in support after reviewing all correspondences regarding requests for discovery	3.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		1/19/22	Gen-15	Other Submission/ Motion/ Appearance	Worked on motions to compel responses to interrogatories, requests for admissions, and requests for production as to four (4) business defendants.	1.75
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		1/20/22	Gen-12	Discovery-Offensive	Reviewed email from opposing counsel Margarita Salazar regarding her request for extension of deadline on providing supplemental responses to discovery requests.	0.25





## Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Michael Yun	Attorney	1/20/22	Gen-15	Other Submission/ Motion/ Appearance	Worked on Motions to Compel against four (4) business entity defendants and declaration of DAG in support of.	4.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		1/21/22	Gen-12	Discovery-Offensive	Reviewed email from opposing counsel Margarita Salazar regarding timeframe of incoming discovery responses.	0.25
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		1/24/22	Gen-04	Analysis/Strategy	Reviewed email and document containing prior communication with opposing counsel Margarita Salazar from co-counsel DAG Ethan Turner.	0.25
		1/24/22	Gen-15	Other Submission/ Motion/ Appearance	Reviewed and completed four (4) separate compilations of 208-page Exhibits for Declarations in Support of Motion to Compel against Defendants Vertical Bliss, Inc., Kushy Punch, Inc., Conglomerate Marketing, LLC., and More Agency, Inc.	3.50
		1/24/22	Gen-15	Other Submission/ Motion/ Appearance	Worked on Motion to Compel Further Responses.	0.75
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



## Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Michael Yun	Attorney					
		1/25/22	Gen-15	Other Submission/ Motion/ Appearance	Email communication with co-counsel DAG Ethan Turner regarding previous correspondence with opposing counsel for seven (7) defendants for Motion to Compel Further Responses.	0.25
		1/25/22	Gen-15	Other Submission/ Motion/ Appearance	Reviewed email and an exhibit for Declaration in Support of Motion to Compel Further Responses, received from co-counsel DAG Ethan Turner.	0.25



## Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Michael Yun	Attorney	1/26/22	Gen-15	Other Submission/ Motion/ Appearance	Reviewed email from co-counsel DAG Ethan Turner regarding Exhibit for Declaration.	0.25
		1/26/22	Gen-15	Other Submission/ Motion/ Appearance	Telephone call with co-counsel DAG Ethan Turner to discuss Motions to Compel exhibits.	0.25
		1/26/22	Gen-15	Other Submission/ Motion/ Appearance	Worked on Motions to Compel Further Responses.	2.00
		1/27/22	Gen-02	Research	Researched California Code of Civil Procedure related to motions to compel, improper responses to discovery requests, and sanctions.	1.50
		1/27/22	Gen-15	Other Submission/ Motion/ Appearance	Checked Formatting Checklist for Motion to Compel for Superior Court of California.	0.25
		1/27/22	Gen-15	Other Submission/ Motion/ Appearance	Worked on Motion to Compel Further Responses, Meet and Confer Declaration in Support of Motion to Compel Further Responses, and reviewed and edited Statement of Issues in Support of Motion to Compel Further Responses; reviewed all three after initial finalization to make sure their references to each other match and sync.	3.25
		1/28/22	Gen-15	Other Submission/ Motion/ Appearance	Discussed Motion to Compel Further Responses with SAAG Harinder Kapur and co-counsel DAG Ethan Turner.	0.75
		1/28/22	Gen-15	Other Submission/ Motion/ Appearance	Made hearing reservations for all six motions to compel further responses as to six defendants--Vertical Bliss, Kushy Punch, Conglomerate Marketing, More Agency, Toroyan, and Barsamyan--with Los Angeles Superior Court; drafted a record email and sent it to co-counsel DAG Ethan Turner and SAAG Harinder Kapur to relay court reservation information.	0.50



## Transaction Detail for Matter(s): SA2020800072

From Jan 1, 2022 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Michael Yun	Attorney	1/28/22	Gen-15	Other Submission/ Motion/ Appearance	Reviewed feedback from SAAG Harinder Kapur on Motion to Compel Further Responses and did additional work on the document; communication with SAAG Kapur and co-counsel DAG Ethan Turner on additional work.	2.00
		1/28/22	Gen-15	Other Submission/ Motion/ Appearance	Worked on Motion to Compel Further Responses, Meet and Confer Declaration in Support of Motion to Compel Further Responses, and reviewed and edited Statement of Issues in Support of Motion to Compel Further Responses; reviewed all three after initial finalization to make sure their references to each other match and sync.	4.75
		1/31/22	Gen-15	Other Submission/ Motion/ Appearance	Requested ProLaw accounting from AGO Accounting for this matte for up-to-date billings; reviewed prior accounting records upto 01/26/22 to begin calculation of billed hours and expenses dedicated to matters related to the Motions to Compel further responses as to the six defendants; began drafting Cost Declaration; emailed SAAG Harinder Kapur and co-counsel DAG Ethan Turner regarding Cost Declaration.	2.25
		1/31/22	Gen-15	Other Submission/ Motion/ Appearance	Teleconference with co-counsel DAG Ethan Turner and SAAG Harinder Kapur on motions to compel further responses.	0.25
Michael Yun - Total						
SA2020800072 - Total						

## **Exhibit 2**





Transaction Detail for Matter(s): SA2020800072

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney					



Transaction Detail for Matter(s): SA2020800072

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney					



Transaction Detail for Matter(s): SA2020800072

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney					





Transaction Detail for Matter(s): SA2020800072

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney					



Transaction Detail for Matter(s): SA2020800072

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney					



Transaction Detail for Matter(s): SA2020800072

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney					



Transaction Detail for Matter(s): SA2020800072

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Transaction Detail for Matter(s): SA2020800072

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney					



Transaction Detail for Matter(s): SA2020800072

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney					



**Transaction Detail for Matter(s): SA2020800072**

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney					
		10/26/21	Gen-12	Discovery-Offensive	Sent email to opposing counsel about electronic service of discovery responses. Received email notification that discovery would not be timely served. Spoke on the telephone with opposing counsel and SAAG, had separate discussion with DAG White about the case. Worked with templates for a motion to compel.	2.25
		11/5/21	Gen-06	Communication with Other Party	Looked over discovery responses provided on November 1, sent email to SAAG and Co-DAG spoke on the phone with Co-DAG and sent meet and confer email to opposing counsel requesting responses that meet the minimum statutory requirements for responses by 11/22.	2.00





## Transaction Detail for Matter(s): SA2020800072

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney					
		11/16/21	Gen-04	Analysis/Strategy	Follow up phone call and email correspondence with DAG White regarding discovery requests from Halloran and BGR clients.	0.50
		11/23/21	Gen-06	Communication with Other Party	Emails from opposing counsel and conversation with DAG White regarding BGR failure to respond to discovery and motion to be relieved as counsel.	0.50
		11/29/21	Gen-12	Discovery-Offensive	Spoke on the phone with DAG White. Participated in a meet and confer discussion with opposing counsel, updated case calendar and diary and corresponded via email and in a conference call with Co-DAG White and SAAG regarding discovery issues and BGR's motion to be relieved as counsel.	1.75





## Transaction Detail for Matter(s): SA2020800072

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney					
		12/15/21	Gen-04	Analysis/Strategy	Conversation with DAG White regarding discovery pleadings and BGR's motion to be relieved as counsel. Sent motion documents and previous Court order to White for his reference.	0.75
		12/15/21	Gen-12	Discovery-Offensive	Began working on motion to compel further responses from BGR represented defendants.	2.00
		12/21/21	Gen-32	Case Management	Checked to see that all BGR clients had signed substitutions of attorneys moving to Salazar. Emailed Margarita Salazar asking her to meet and confer regarding outstanding discovery responses and to discuss mediation.	1.25
		1/3/22	Gen-32	Case Management	Had Teleconference with SAAG and Co-DAG Yun to discuss the outstanding tasks in the case. Reviewed motion to compel further responses template. Sent email to opposing counsel.	1.00
		1/4/22	Gen-12	Discovery-Offensive	Worked on templates for motion to compel further responses for Barsamyan, Toroyon, Kushy Punch, Vertical Bliss, More Agency, and Consolidated Marketing. Contacted opposing counsel to set of meet and confer ahead of filing motion. Corresponded with litigation team. Spoke on the phone with Halloran's Counsel regarding mediation.	1.75



**Transaction Detail for Matter(s): SA2020800072**

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney	1/5/22	Gen-12	Discovery-Offensive	Corresponded with SAAG regarding opposing counsel's failure to respond to email from 1/3. Sent email invite to Salazar for 10:30 am teleconference to meet and confer with her regarding her client's failure to adequately respond to discovery requests. participated in teleconference with DAG Yun, SAAG Kapur, and sent follow up email to Ms. Salazar to document the discussion and schedule future meeting to initiate mediation.	1.75
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		1/12/22	Gen-06	Communication with Other Party	Sent email to opposing counsel to check in regarding discovery responses and remind her of due dates.	0.25
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



## Transaction Detail for Matter(s): SA2020800072

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney	1/14/22	Gen-04	Analysis/Strategy	Teleconference with DAG Yun about case. We agreed to a division of labor. I provided him with a complete set of draft motion to compel documents that were partially completed (Motion, Declaration, Separate Statement of Issues).	2.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		1/19/22	Gen-06	Communication with Other Party	Sent another follow up email to Salazar regarding discovery and mediation.	0.25
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		1/20/22	Gen-07	Pleading Preparation	Corresponded with DAG Yun regarding motion to compel further responses and provided PDF printouts of email correspondence to be attached as exhibits to my declaration in support of the motion to compel.	1.00
		1/20/22	Gen-12	Discovery-Offensive	Corresponded with opposing counsel regarding due date of Defendants' discovery responses. Corresponded with CO-DAG about opposing counsel's failure to respond. Reviewed Halloran discovery.	1.50
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



**Transaction Detail for Matter(s): SA2020800072**

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		1/28/22	Gen-12	Discovery-Offensive	Spoke to SAAG and DAG Yun regarding draft pleadings, made final edits to declaration and added final exhibits, printed to PDF, signed and emailed to DAG Yun for inclusion in the motion to compel further responses packet. Edited separate statement of Issues in support of motion to compel further responses. and emailed final version to DAG Yun.	2.25
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



## Transaction Detail for Matter(s): SA2020800072

From Jul 1, 2021 to Feb 1, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)						
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours
Ethan A. Turner	Attorney	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
Ethan A. Turner - Total						[REDACTED]
SA2020800072 - Total						[REDACTED]



**DECLARATION OF SERVICE BY E-MAIL and U.S. Mail**

Case Name: **California Department of Public Health, et al. v. Vertical Bliss, Inc., et al.**  
No.: **20CHCV00560**

I declare:

I am employed in the Office of the Attorney General, which is the office of a member of the California State Bar, at which member's direction this service is made. I am 18 years of age or older and not a party to this matter. I am familiar with the business practice at the Office of the Attorney General for collection and processing of correspondence for mailing with the United States Postal Service. In accordance with that practice, correspondence placed in the internal mail collection system at the Office of the Attorney General is deposited with the United States Postal Service with postage thereon fully prepaid that same day in the ordinary course of business.

On February 4, 2022, I served the attached **MOTION TO COMPEL FURTHER RESPONSES AND REQUEST FOR MONETARY SANCTION AS TO DEFENDANT KUSHY PUNCH, INC.; DECLARATION OF ETHAN TURNER IN SUPPORT OF MTC; SEPARATE STATEMENT OF ISSUES IN SUPPORT OF MTC; AND COST DECLARATION BY DAG MICHAEL YUN IN SUPPORT OF MTC** by transmitting a true copy via electronic mail. In addition, I placed a true copy thereof enclosed in a sealed envelope, in the internal mail system of the Office of the Attorney General, addressed as follows:

<b>Party</b>	<b>Address</b>
Margarita Salazar, Esq. <i>Attorney for Defendants Ruben Kachian, Vertical Bliss, Inc., Kushy Punch, Inc., Conglomerate Marketing, LLC., More Agency, Inc., Arutyun Barsamyan, and Mike A. Toroyan</i>	Margarita Salazar, Esq. Law Offices of Margarita Salazar 470 Third Avenue, Ste. 9 Chula Vista, CA 91910-4663 <b>E-mail Address:</b> margarita@msalazarlaw.com
Ian Stewart Wilson Elser Moskowitz Edelman & Dicker LLP <i>Attorney for Defendant Kevin Halloran</i>	<b>E-mail Address:</b> ian.stewart@wilsonelser.com

I declare under penalty of perjury under the laws of the State of California and the United States of America the foregoing is true and correct and that this declaration was executed on February 4, 2022, at San Diego, California.

A. Flores

Declarant



Signature