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EXEMPT FROM FILING FEES  
GOV. CODE, § 6103

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 COUNTY OF LOS ANGELES

13 NORTH VALLEY DISTRICT – CHATSWORTH COURTHOUSE

15 CALIFORNIA DEPARTMENT OF  
16 PUBLIC HEALTH AND BUREAU  
17 OF CANNABIS CONTROL,

18 Plaintiffs,

19 v.

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

24 Defendant

Case No. 20CHCV00560

SEPARATE STATEMENT OF ISSUES IN  
SUPPORT OF MOTION TO COMPEL  
FURTHER RESPONSES AND REQUEST  
FOR SANCTIONS

Date: May 25, 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. 568594989436

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Pursuant to Rules of Court, rule 3.1345, the Department of Cannabis Control<sup>1</sup> (“Plaintiff”) submits the following Separate Statement of Issues in Support of the concurrently filed Motion to Compel Further Responses and Request for Sanctions against defendant Arutyun Barsamyan (“Defendant”).

Because every discovery request was met with the exact same set of boilerplate objections, the Defendant’s responses are uniformly defective. Every one of Defendant’s responses were incomplete, evasive, and the objections made to each interrogatory or request were without merit and were too general. Therefore, Plaintiff requests that Defendant be compelled to provide further responses to the propounded form interrogatories pursuant to Code Civ. Proc., § 2030.300 and to the Plaintiff’s requests for admissions, pursuant to Code Civ. Proc., § 2033.290.

#### Form Interrogatories Served on Counsel for Arutyun Barsamyan

<b><u>FORM INTERROGATORY NO. 1.1</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
State the name, ADDRESS, telephone number, and relationship to you of each PERSON who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)	Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	1. The answer given was not made under oath (Code Civ. Proc § 2030.210, subd. (a)). 2. No responsive information is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)), 3. The objections are without merit and are too general (Code Civ. Proc., § 2030.300, subd. (a)(3)); 4. All objections are without merit and too general (Code Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd. (a)(3).) 5. The answer is evasive and incomplete (Code Civ. Proc. § 2030.300, subd. (a))

<sup>1</sup> Section 8 of AB 141, specifically, Business and Professions Code section 26010.7, subdivision (d), states that “[Any action by or against the Bureau of Cannabis Control, [or] the State Department of Public Health . . . pertaining to matters vested in the Department of Cannabis Control by this section shall not abate but shall continue in the name of the Department of Cannabis Control, and the Department of Cannabis Control shall be substituted for the Bureau of Cannabis Control, the State Department of Public Health, and the Department of Food and Agriculture by the court wherein the action is pending. The substitution shall not in any way affect the rights of the parties to the action.”

<p><b><u>FORM</u></b>  <b><u>INTERROGATORY</u></b>  <b><u>NO. 2.1</u></b>  State:  (a) your name;  (b) every name you have used in the past; and  (c) the dates you used each name.</p>	<p><b><u>Response</u></b>  Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.</p>	<p><b><u>Basis for Further Response</u></b>  1. The answer given was not made under oath (Code Civ. Proc § 2030.210, subd. (a)).  2. No responsive information is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)),  3. The objections are without merit and are too general (Code Civ. Proc., § 2030.300, subd. (a)(3));  4. All objections are without merit and too general (Code Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd. (a)(3).)  5. The answer is evasive and incomplete (Code Civ. Proc. § 2030.300, subd. (a))</p>
<p><b><u>FORM</u></b>  <b><u>INTERROGATORY</u></b>  <b><u>NO. 2.2:</u></b>  State the date and place of your birth.</p>	<p><b><u>Response</u></b>  Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.</p>	<p><b><u>Basis for Further Response</u></b>  1. The answer given was not made under oath (Code Civ. Proc § 2030.210, subd. (a)).  2. No responsive information is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)),  3. The objections are without merit and are too general (Code Civ. Proc., § 2030.300, subd. (a)(3));  4. All objections are without merit and too general (Code Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd. (a)(3).)  5. The answer is evasive and incomplete (Code Civ. Proc. § 2030.300, subd. (a).)</p>
<p><b><u>FORM</u></b>  <b><u>INTERROGATORY</u></b>  <b><u>NO. 2.5:</u></b>  State:  (a) your present residence ADDRESS;  (b) your residence ADDRESSES for the past five years; and  (c) the dates you lived at each ADDRESS.</p>	<p><b><u>Response</u></b>  Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.</p>	<p><b><u>Basis for Further Response</u></b>  1. The answer given was not made under oath (Code Civ. Proc § 2030.210, subd. (a)).  2. No responsive information is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)),  3. The objections are without merit and are too general (Code Civ. Proc., § 2030.300, subd. (a)(3));  4. All objections are without merit and too general (Code Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd. (a)(3).)  5. The answer is evasive and</p>

		incomplete (Code Civ. Proc. § 2030.300, subd. (a).)
<p><b><u>FORM</u></b>  <b><u>INTERROGATORY</u></b>  <b><u>NO. 2.6:</u></b>  State:  (a) the name, ADDRESS, and telephone number of your present employer or place of self-employment; and  (b) the name, ADDRESS, dates of employment, job title, and nature of work for each employer or self-employment you have had from five years before the INCIDENT until today.</p>	<p><b><u>Response</u></b>  Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.</p>	<p><b><u>Basis for Further Response</u></b>  1. The answer given was not made under oath (Code Civ. Proc § 2030.210, subd. (a)).  2. No responsive information is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)),  3. The objections are without merit and are too general (Code Civ. Proc., § 2030.300, subd. (a)(3));  4. All objections are without merit and too general (Code Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd. (a)(3).)  5. The answer is evasive and incomplete (Code Civ. Proc. § 2030.300, subd. (a).)</p>
<p><b><u>FORM</u></b>  <b><u>INTERROGATORY</u></b>  <b><u>NO. 2.7</u></b>  State:  (a) the name and ADDRESS of each school or other academic or vocational institution you have attended, beginning with high school;  (b) the dates you attended;  (c) the highest grade level you have completed; and  (d) the degrees received.</p>	<p><b><u>Response</u></b>  Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.</p>	<p><b><u>Basis for Further Response</u></b>  1. The answer given was not made under oath (Code Civ. Proc § 2030.210, subd. (a)).  2. No responsive information is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)),  3. The objections are without merit and are too general (Code Civ. Proc., § 2030.300, subd. (a)(3));  4. All objections are without merit and too general (Code Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd. (a)(3).)  5. The answer is evasive and incomplete (Code Civ. Proc. § 2030.300, subd. (a).)</p>
<p><b><u>FORM</u></b>  <b><u>INTERROGATORY</u></b>  <b><u>NO. 2.8:</u></b>  Have you ever been convicted of a felony?  If so, for each conviction state:  (a) the city and state</p>	<p><b><u>Response</u></b>  Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may</p>	<p><b><u>Basis for Further Response</u></b>  1. The answer given was not made under oath (Code Civ. Proc § 2030.210, subd. (a)).  2. No responsive information is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)),  3. The objections are without merit and are too general</p>

1 2 3 4 5	where you were convicted; (b) the date of conviction; (c) the offense; and (d) the court and case number.	seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	(Code Civ. Proc., § 2030.300, subd. (a)(3)); 4. All objections are without merit and too general (Code Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd. (a)(3).) 5. The answer is evasive and incomplete (Code Civ. Proc. § 2030.300, subd. (a).)
6 7 8 9 10 11 12 13 14 15	<b><u>FORM</u></b> <b><u>INTERROGATORY</u></b> <b><u>NO. 2.9</u></b> Can you speak English with ease? If not, what language and dialect do you normally use?	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer given was not made under oath (Code Civ. Proc § 2030.210, subd. (a)). 2. No responsive information is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)), 3. The objections are without merit and are too general (Code Civ. Proc., § 2030.300, subd. (a)(3)); 4. All objections are without merit and too general (Code Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd. (a)(3).) 5. The answer is evasive and incomplete (Code Civ. Proc. § 2030.300, subd. (a).)
16 17 18 19 20 21 22 23 24	<b><u>FORM</u></b> <b><u>INTERROGATORY</u></b> <b><u>NO. 2.10</u></b> Can you read and write English with ease? If not, what language and dialect do you normally use?	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer given was not made under oath (Code Civ. Proc § 2030.210, subd. (a)). 2. No responsive information is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)), 3. The objections are without merit and are too general (Code Civ. Proc., § 2030.300, subd. (a)(3)); 4. All objections are without merit and too general (Code Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd. (a)(3).) 5. The answer is evasive and incomplete (Code Civ. Proc. § 2030.300, subd. (a).)
25 26 27 28	<b><u>FORM</u></b> <b><u>INTERROGATORY</u></b> <b><u>NO. 2.11</u></b> At the time of the INCIDENT were you acting as an agent or	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek	<b><u>Basis for Further Response</u></b> 1. The answer given was not made under oath (Code Civ. Proc § 2030.210, subd. (a)). 2. No responsive information is provided (Code Civ. Proc.

<p>1 employee for any</p> <p>2 PERSON? If so, state:</p> <p>3 (a) the name,</p> <p>4 ADDRESS, and</p> <p>5 telephone number of</p> <p>6 that PERSON; and</p> <p>7 (b) a description of your</p> <p>8 duties.</p>	<p>documents and evidence protected</p> <p>from disclosure by the attorney</p> <p>work product doctrine; (3) it may</p> <p>seek documents and evidence</p> <p>protected from disclosure by the</p> <p>attorney-client privilege; (4) it may</p> <p>seek documents and evidence</p> <p>protected from disclosure by other</p> <p>privileges or doctrines that are not</p> <p>readily apparent given the broad</p> <p>scope of the request.</p>	<p>§ 2030.210, subd. (a)(1)),</p> <p>3. The objections are without</p> <p>merit and are too general</p> <p>(Code Civ. Proc., § 2030.300,</p> <p>subd. (a)(3));</p> <p>4. All objections are without</p> <p>merit and too general (Code</p> <p>Civ. Proc., §§ 2030.240,</p> <p>subd. (b), 23030.300, subd.</p> <p>(a)(3).)</p> <p>5. The answer is evasive and</p> <p>incomplete (Code Civ. Proc.</p> <p>§ 2030.300, subd. (a).)</p>
<p><b><u>FORM</u></b></p> <p><b><u>INTERROGATORY</u></b></p> <p><b><u>NO. 3.1</u></b></p> <p>Are you a corporation?</p> <p>If so, state:</p> <p>(a) the name stated in</p> <p>the current articles of</p> <p>incorporation;</p> <p>(b) all other names used</p> <p>by the corporation</p> <p>during the past 10 years</p> <p>and the dates each</p> <p>was used;</p> <p>(c) the date and place of</p> <p>incorporation;</p> <p>(d) the ADDRESS of</p> <p>the principal place of</p> <p>business; and</p> <p>(e) whether you are</p> <p>qualified to do business</p> <p>in California.</p>	<p><b><u>Response</u></b></p> <p>Responding Party objects to this</p> <p>request on the following grounds:</p> <p>(1) it is overbroad, unduly</p> <p>burdensome, and lacks reasonable</p> <p>particularity; (2) it may seek</p> <p>documents and evidence protected</p> <p>from disclosure by the attorney</p> <p>work product doctrine; (3) it may</p> <p>seek documents and evidence</p> <p>protected from disclosure by the</p> <p>attorney-client privilege; (4) it may</p> <p>seek documents and evidence</p> <p>protected from disclosure by other</p> <p>privileges or doctrines that are not</p> <p>readily apparent given the broad</p> <p>scope of the request.</p>	<p><b><u>Basis for Further Response</u></b></p> <p>1. The answer given was not</p> <p>made under oath (Code Civ.</p> <p>Proc § 2030.210, subd. (a)).</p> <p>2. No responsive information</p> <p>is provided (Code Civ. Proc.</p> <p>§ 2030.210, subd. (a)(1)),</p> <p>3. The objections are without</p> <p>merit and are too general</p> <p>(Code Civ. Proc., § 2030.300,</p> <p>subd. (a)(3));</p> <p>4. All objections are without</p> <p>merit and too general (Code</p> <p>Civ. Proc., §§ 2030.240,</p> <p>subd. (b), 23030.300, subd.</p> <p>(a)(3).)</p> <p>5. The answer is evasive and</p> <p>incomplete (Code Civ. Proc.</p> <p>§ 2030.300, subd. (a).)</p>
<p><b><u>FORM</u></b></p> <p><b><u>INTERROGATORY</u></b></p> <p><b><u>NO. 3.2</u></b></p> <p>Are you a partnership?</p> <p>If so, state:</p> <p>(a) the current</p> <p>partnership name;</p> <p>(b) all other names used</p> <p>by the partnership</p> <p>during the past 10 years</p> <p>and the dates each</p> <p>was used;</p> <p>(c) whether you are a</p> <p>limited partnership and</p> <p>if so, under the laws of</p>	<p><b><u>Response</u></b></p> <p>Responding Party objects to this</p> <p>request on the following grounds:</p> <p>(1) it is overbroad, unduly</p> <p>burdensome, and lacks reasonable</p> <p>particularity; (2) it may seek</p> <p>documents and evidence protected</p> <p>from disclosure by the attorney</p> <p>work product doctrine; (3) it may</p> <p>seek documents and evidence</p> <p>protected from disclosure by the</p> <p>attorney-client privilege; (4) it may</p> <p>seek documents and evidence</p> <p>protected from disclosure by other</p> <p>privileges or doctrines that are not</p> <p>readily apparent given the broad</p> <p>scope of the request.</p>	<p><b><u>Basis for Further Response</u></b></p> <p>1. The answer given was not</p> <p>made under oath (Code Civ.</p> <p>Proc § 2030.210, subd. (a)).</p> <p>2. No responsive information</p> <p>is provided (Code Civ. Proc.</p> <p>§ 2030.210, subd. (a)(1)),</p> <p>3. The objections are without</p> <p>merit and are too general</p> <p>(Code Civ. Proc., § 2030.300,</p> <p>subd. (a)(3));</p> <p>4. All objections are without</p> <p>merit and too general (Code</p> <p>Civ. Proc., §§ 2030.240,</p> <p>subd. (b), 23030.300, subd.</p> <p>(a)(3).)</p> <p>5. The answer is evasive and</p>

1	what jurisdiction;		incomplete (Code Civ. Proc. § 2030.300, subd. (a).)
2	(d) the name and		
3	ADDRESS of each		
4	general partner; and		
5	(e) the ADDRESS of		
6	the principal place of		
7	business.		
8	<b><u>FORM</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
9	<b><u>INTERROGATORY</u></b>	Responding Party objects to this	1. The answer given was not
10	<b><u>NO. 3.3</u></b>	request on the following grounds:	made under oath (Code Civ.
11	Are you a limited	(1) it is overbroad, unduly	Proc § 2030.210, subd. (a)).
12	liability company? If	burdensome, and lacks reasonable	2. No responsive information
13	so, state:	particularity; (2) it may seek	is provided (Code Civ. Proc.
14	(a) the name stated in	documents and evidence protected	§ 2030.210, subd. (a)(1)),
15	the current articles of	from disclosure by the attorney	3. The objections are without
16	organization;	work product doctrine; (3) it may	merit and are too general
17	(b) all other names used	seek documents and evidence	(Code Civ. Proc., § 2030.300,
18	by the company during	protected from disclosure by the	subd. (a)(3));
19	the past 10 years and	attorney-client privilege; (4) it may	4. All objections are without
20	the dates each	seek documents and evidence	merit and too general (Code
21	was used;	protected from disclosure by other	Civ. Proc., §§ 2030.240,
22	(c) the date and place of	privileges or doctrines that are not	subd. (b), 23030.300, subd.
23	filing of the articles of	readily apparent given the broad	(a)(3).)
24	organization;	scope of the request.	5. The answer is evasive and
25	(d) the ADDRESS of		incomplete (Code Civ. Proc.
26	the principal place of		§ 2030.300, subd. (a).)
27	business; and		
28	(e) whether you are		
	qualified to do business		
	in California.		
	<b><u>FORM</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
	<b><u>INTERROGATORY</u></b>	Responding Party objects to this	1. The answer given was not
	<b><u>NO. 3.4</u></b>	request on the following grounds:	made under oath (Code Civ.
	Are you a joint venture?	(1) it is overbroad, unduly	Proc § 2030.210, subd. (a)).
	If so, state:	burdensome, and lacks reasonable	2. No responsive information
	(a) the current joint	particularity; (2) it may seek	is provided (Code Civ. Proc.
	venture name;	documents and evidence protected	§ 2030.210, subd. (a)(1)),
	(b) all other names used	from disclosure by the attorney	3. The objections are without
	by the joint venture	work product doctrine; (3) it may	merit and are too general
	during the past 10 years	seek documents and evidence	(Code Civ. Proc., § 2030.300,
	and the dates	protected from disclosure by the	subd. (a)(3));
	each was used;	attorney-client privilege; (4) it may	4. All objections are without
	(c) the name and	seek documents and evidence	merit and too general (Code
	ADDRESS of each	protected from disclosure by other	Civ. Proc., §§ 2030.240,
	joint venture; and	privileges or doctrines that are not	subd. (b), 23030.300, subd.
	(d) the ADDRESS of	readily apparent given the broad	(a)(3).)
	the principal place of	scope of the request.	5. The answer is evasive and
			incomplete (Code Civ. Proc.
			§ 2030.300, subd. (a).)

1	business.		
2	<b><u>FORM</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
3	<b><u>INTERROGATORY</u></b>	Responding Party objects to this	1. The answer given was not
4	<b><u>NO. 3.5</u></b>	request on the following grounds:	made under oath (Code Civ.
5	<b><u>ARE YOU AN</u></b>	(1) it is overbroad, unduly	Proc § 2030.210, subd. (a)).
6	unincorporated	burdensome, and lacks reasonable	2. No responsive information
7	association? If so, state:	particularity; (2) it may seek	is provided (Code Civ. Proc.
8	(a) the current	documents and evidence protected	§ 2030.210, subd. (a)(1)),
9	unincorporated	from disclosure by the attorney	3. The objections are without
10	association name;	work product doctrine; (3) it may	merit and are too general
11	(b) all other names used	seek documents and evidence	(Code Civ. Proc., § 2030.300,
12	by the unincorporated	protected from disclosure by the	subd. (a)(3));
13	association during the	attorney-client privilege; (4) it may	4. All objections are without
14	past 10 years and	seek documents and evidence	merit and too general (Code
15	the dates each was	protected from disclosure by other	Civ. Proc., §§ 2030.240,
16	used;	privileges or doctrines that are not	subd. (b), 23030.300, subd.
17		readily apparent given the broad	(a)(3).)
18		scope of the request.	5. The answer is evasive and
19			incomplete (Code Civ. Proc.
20			§ 2030.300, subd. (a).)
21	<b><u>FORM</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
22	<b><u>INTERROGATORY</u></b>	Responding Party objects to this	1. The answer given was not
23	<b><u>NO. 3.5</u></b>	request on the following grounds:	made under oath (Code Civ.
24	Are you an	(1) it is overbroad, unduly	Proc § 2030.210, subd. (a)).
25	unincorporated	burdensome, and lacks reasonable	2. No responsive information
26	association? If so, state:	particularity; (2) it may seek	is provided (Code Civ. Proc.
27	(a) the current	documents and evidence protected	§ 2030.210, subd. (a)(1)),
28	unincorporated	from disclosure by the attorney	3. The objections are without
	association name;	work product doctrine; (3) it may	merit and are too general
	(b) all other names used	seek documents and evidence	(Code Civ. Proc., § 2030.300,
	by the unincorporated	protected from disclosure by the	subd. (a)(3));
	association during the	attorney-client privilege; (4) it may	4. All objections are without
	past 10 years and	seek documents and evidence	merit and too general (Code
	the dates each was	protected from disclosure by other	Civ. Proc., §§ 2030.240,
	used;	privileges or doctrines that are not	subd. (b), 23030.300, subd.
		readily apparent given the broad	(a)(3).)
		scope of the request.	5. The answer is evasive and
			incomplete (Code Civ. Proc.
			§ 2030.300, subd. (a).)
	<b><u>FORM</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
	<b><u>INTERROGATORY</u></b>	Responding Party objects to this	1. The answer given was not
	<b><u>NO. 3.6</u></b>	request on the following grounds:	made under oath (Code Civ.
	Have you done business	(1) it is overbroad, unduly	Proc § 2030.210, subd. (a)).
	under a fictitious name	burdensome, and lacks reasonable	2. No responsive information
	during the past 10	particularity; (2) it may seek	is provided (Code Civ. Proc.
	years? If so, for each	documents and evidence protected	§ 2030.210, subd. (a)(1)),
	fictitious name state:	from disclosure by the attorney	3. The objections are without
	(a) the name;	work product doctrine; (3) it may	merit and are too general
	(b) the dates each was	seek documents and evidence	(Code Civ. Proc., § 2030.300,
	used;	protected from disclosure by the	subd. (a)(3));
	(c) the state and county	attorney-client privilege; (4) it may	4. All objections are without
	of each fictitious name	seek documents and evidence	merit and too general (Code
		protected from disclosure by other	Civ. Proc., §§ 2030.240,
		privileges or doctrines that are not	subd. (b), 23030.300, subd.



1	filing; and	readily apparent given the broad	(a)(3).)
2	(d) the ADDRESS of	scope of the request.	5. The answer is evasive and
3	the principal place of		incomplete (Code Civ. Proc.
4	business.		§ 2030.300, subd. (a).)
5	<b><u>FORM</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
6	<b><u>INTERROGATORY</u></b>	Responding Party objects to this	1. The answer given was not
7	<b><u>NO. 3.7</u></b>	request on the following grounds:	made under oath (Code Civ.
8	Within the past five	(1) it is overbroad, unduly	Proc § 2030.210, subd. (a)).
9	years has any public	burdensome, and lacks reasonable	2. No responsive information
10	entity registered or	particularity; (2) it may seek	is provided (Code Civ. Proc.
11	licensed your business?	documents and evidence protected	§ 2030.210, subd. (a)(1)),
12	If so,	from disclosure by the attorney	3. The objections are without
13	for each license or	work product doctrine; (3) it may	merit and are too general
14	registration:	seek documents and evidence	(Code Civ. Proc., § 2030.300,
15	(a) identify the license	protected from disclosure by the	subd. (a)(3));
16	or registration;	attorney-client privilege; (4) it may	4. All objections are without
17	(b) state the name of the	seek documents and evidence	merit and too general (Code
18	public entity; and	protected from disclosure by other	Civ. Proc., §§ 2030.240,
19	(c) state the dates of	privileges or doctrines that are not	subd. (b), 23030.300, subd.
20	issuance and expiration.	readily apparent given the broad	(a)(3).)
21		scope of the request.	5. The answer is evasive and
22			incomplete (Code Civ. Proc.
23			§ 2030.300, subd. (a).)
24	<b><u>FORM</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
25	<b><u>INTERROGATORY</u></b>	Responding Party objects to this	1. The answer given was not
26	<b><u>NO. 4.1</u></b>	request on the following grounds:	made under oath (Code Civ.
27	At the time of the	(1) it is overbroad, unduly	Proc § 2030.210, subd. (a)).
28	INCIDENT, was there	burdensome, and lacks reasonable	2. No responsive information
	in effect any policy of	particularity; (2) it may seek	is provided (Code Civ. Proc.
	insurance through	documents and evidence protected	§ 2030.210, subd. (a)(1)),
	which	from disclosure by the attorney	3. The objections are without
	you were or might be	work product doctrine; (3) it may	merit and are too general
	insured in any manner	seek documents and evidence	(Code Civ. Proc., § 2030.300,
	(for example, primary,	protected from disclosure by the	subd. (a)(3));
	pro-rata, or excess	attorney-client privilege; (4) it may	4. All objections are without
	liability	seek documents and evidence	merit and too general (Code
	coverage or medical	protected from disclosure by other	Civ. Proc., §§ 2030.240,
	expense coverage) for	privileges or doctrines that are not	subd. (b), 23030.300, subd.
	the damages, claims, or	readily apparent given the broad	(a)(3).)
	actions that have arisen	scope of the request.	5. The answer is evasive and
	out of		incomplete (Code Civ. Proc.
	the INCIDENT? If so,		§ 2030.300, subd. (a).)
	for each policy state:		
	(a) the kind of		
	coverage;		
	(b) the name and		
	ADDRESS of the		
	insurance company;		
	(c) the name,		

1	ADDRESS, and		
2	telephone number of		
3	each named insured;		
4	(d) the policy number;		
5	(e) the limits of		
6	coverage for each type		
7	of coverage contained		
8	in the policy;		
9	(f) whether any		
10	reservation of rights or		
11	controversy or coverage		
12	dispute exists between		
13	you and the insurance		
14	company; and		
15	(g) the name,		
16	ADDRESS, and		
17	telephone number of		
18	the custodian of the		
19	policy.		
20	<b><u>FORM</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
21	<b><u>INTERROGATORY</u></b>		
22	<b><u>NO. 4.2</u></b>		
23	Are you self-insured	Responding Party objects to this	1. The answer given was not
24	under any statute for the	request on the following grounds:	made under oath (Code Civ.
25	damages, claims, or	(1) it is overbroad, unduly	Proc § 2030.210, subd. (a)).
26	actions that have arisen	burdensome, and lacks reasonable	2. No responsive information
27	out of the INCIDENT?	particularity; (2) it may seek	is provided (Code Civ. Proc.
28	If so, specify the	documents and evidence protected	§ 2030.210, subd. (a)(1)),
	statute.	from disclosure by the attorney	3. The objections are without
		work product doctrine; (3) it may	merit and are too general
		seek documents and evidence	(Code Civ. Proc., § 2030.300,
		protected from disclosure by the	subd. (a)(3));
		attorney-client privilege; (4) it may	4. All objections are without
		seek documents and evidence	merit and too general (Code
		protected from disclosure by other	Civ. Proc., §§ 2030.240,
		privileges or doctrines that are not	subd. (b), 23030.300, subd.
		readily apparent given the broad	(a)(3).)
		scope of the request.	5. The answer is evasive and
			incomplete (Code Civ. Proc.
			§ 2030.300, subd. (a).)
	<b><u>FORM</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
	<b><u>INTERROGATORY</u></b>		
	<b><u>NO. 15.1</u></b>		
	Identify each denial of a	Responding Party objects to this	1. The answer given was not
	material allegation and	request on the following grounds:	made under oath (Code Civ.
	each special or	(1) it is overbroad, unduly	Proc § 2030.210, subd. (a)).
	affirmative defense in	burdensome, and lacks reasonable	2. No responsive information
	your	particularity; (2) it may seek	is provided (Code Civ. Proc.
	pleadings and for each:	documents and evidence protected	§ 2030.210, subd. (a)(1)),
	(a) state all facts upon	from disclosure by the attorney	3. The objections are without
	which you base the	work product doctrine; (3) it may	merit and are too general
	denial or special or	seek documents and evidence	(Code Civ. Proc., § 2030.300,
		protected from disclosure by the	subd. (a)(3));
		attorney-client privilege; (4) it may	4. All objections are without
		seek documents and evidence	merit and too general (Code
		protected from disclosure by other	Civ. Proc., §§ 2030.240,

1 2 3 4 5 6 7 8 9 10 11 12	affirmative defense; (b) state the names, ADDRESSES, and telephone numbers of all PERSONS who have knowledge of those facts; and (d) identify all DOCUMENTS and other tangible things that support your denial or special or affirmative, and state the name, ADDRESS, and telephone number of the PERSON who has each DOCUMENT.	privileges or doctrines that are not readily apparent given the broad scope of the request.	subd. (b), 23030.300, subd. (a)(3).) 5. The answer is evasive and incomplete (Code Civ. Proc. § 2030.300, subd. (a).)
13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	<b><u>FORM</u></b> <b><u>INTERROGATORY</u></b> <b><u>NO. 17.1</u></b> Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission: (a) state the number of the request; (b) state all facts upon which you base your response; (c) state the names, ADDRESSES, and telephone numbers of all PERSONS who have knowledge of those facts; and (d) identify all DOCUMENTS and other tangible things that support your	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer given was not made under oath (Code Civ. Proc § 2030.210, subd. (a)). 2. No responsive information is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)), 3. The objections are without merit and are too general (Code Civ. Proc., § 2030.300, subd. (a)(3)); 4. All objections are without merit and too general (Code Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd. (a)(3).) 5. The answer is evasive and incomplete (Code Civ. Proc. § 2030.300, subd. (a).)

1 2 3 4 5	response and state the name, ADDRESS, and telephone number of the PERSON who has each DOCUMENT or thing.		
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**Requests for Admissions Served on Counsel for Arutyun Barsamyan**

8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	<b><u>REQUEST FOR ADMISSION NO. 1:</u></b> Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission: (a) state the number of the request; (b) state all facts upon which you base your response; (c) state the names, ADDRESSES, and telephone numbers of all PERSONS who have knowledge of those facts; and (d) identify all DOCUMENTS and other tangible things that support your response and state the name, ADDRESS, and telephone number of the PERSON who has each DOCUMENT or thing.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
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<p><b><u>REQUEST FOR ADMISSION NO. 2:</u></b> Admit that YOU leased the PREMISES in the period from April 23, 2018 to October 2, 2019.</p>	<p><b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.</p>	<p><b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)</p>
<p><b><u>REQUEST FOR ADMISSION NO. 3:</u></b> Admit that YOU operated a business at the PREMISES in the period from April 23, 2018 to October 2, 2019.</p>	<p><b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.</p>	<p><b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)</p>
<p><b><u>REQUEST FOR ADMISSION NO. 4:</u></b> Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period</p>	<p><b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.</p>	<p><b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)</p>
<p><b><u>REQUEST FOR ADMISSION NO. 5:</u></b> Admit that YOU</p>	<p><b><u>Response</u></b> Responding Party objects to this request on the following grounds:</p>	<p><b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete</p>

engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.	(1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	(Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
<b><u>REQUEST FOR ADMISSION NO. 6:</u></b> Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES, on at least 50 separate days, at some point in the period from April 23, 2018 to October 2, 2019.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
<b><u>REQUEST FOR ADMISSION NO. 7:</u></b> Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES, on at least 100 separate days, at some point in the period from April 23, 2018 to October 2, 2019.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
<b><u>REQUEST FOR ADMISSION NO. 8:</u></b> Admit that YOU engaged in COMMERCIAL	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek	1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general

1 2 3 4 5 6	MANUFACTURING CANNABIS ACTIVITY at the PREMISES, on at least 200 separate days, at some point in the period from April 23, 2018 to October 2, 2019.	documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	(Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
7 8 9 10 11 12 13 14	<b><u>REQUEST FOR ADMISSION NO. 9:</u></b> Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES, on at least 300 separate days, at some point in the period from April 23, 2018 to October 2, 2019.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
15 16 17 18 19 20 21 22	<b><u>REQUEST FOR ADMISSION NO. 10:</u></b> Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES, on at least 400 separate days, at some point in the period from April 23, 2018 to October 2, 2019.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
23 24 25 26 27 28	<b><u>REQUEST FOR ADMISSION NO. 11:</u></b> Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2));

1 2 3 4	PREMISES, on at least 500 separate days, at some point in the period from April 23, 2018 to October 2, 2019.	seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
5 6 7 8 9 10 11 12	<b><u>REQUEST FOR ADMISSION NO. 12:</u></b> Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES, on at least 527 separate days, at some point in the period from April 23, 2018 to October 2, 2019.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
13 14 15 16 17 18 19 20 21	<b><u>REQUEST FOR ADMISSION NO. 13:</u></b> Admit that the GROSS REVENUE YOU received from COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019 exceeded \$100,001.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
22 23 24 25 26 27 28	<b><u>REQUEST FOR ADMISSION NO. 14:</u></b> Admit that the GROSS REVENUE YOU received from COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific



1	2018 to April 22, 2019	seek documents and evidence	ground for the objection.
2	exceeded \$500,001.	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
3		privileges or doctrines that are not	subd. (b).)
4	<b><u>REQUEST FOR</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
5	<b><u>ADMISSION NO. 15:</u></b>	Responding Party objects to this	1. The answer to the request
6	Admit that the GROSS	request on the following grounds:	is evasive and incomplete
7	REVENUE YOU	(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
8	received from	burdensome, and lacks reasonable	subd. (a)(1)),
9	COMMERCIAL	particularity; (2) it may seek	2. The objections are without
10	MANUFACTURING	documents and evidence protected	merit and are too general
11	CANNABIS	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
12	ACTIVITY at the	work product doctrine; (3) it may	subd. (a)(2));
13	PREMISES in the	seek documents and evidence	3. All objections are made
14	period from April 23,	protected from disclosure by the	without connecting the
15	2018 to April 22, 2019	attorney-client privilege; (4) it may	questions to any specific
16	exceeded \$1,500,001.	seek documents and evidence	ground for the objection.
17		protected from disclosure by other	(Code Civ. Proc., § 2033.230,
18		privileges or doctrines that are not	subd. (b).)
19		readily apparent given the broad	
20		scope of the request.	
21	<b><u>REQUEST FOR</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
22	<b><u>ADMISSION NO. 16:</u></b>	Responding Party objects to this	1. The answer to the request
23	Admit that the GROSS	request on the following grounds:	is evasive and incomplete
24	REVENUE YOU	(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
25	received from	burdensome, and lacks reasonable	subd. (a)(1)),
26	COMMERCIAL	particularity; (2) it may seek	2. The objections are without
27	MANUFACTURING	documents and evidence protected	merit and are too general
28	CANNABIS	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
	ACTIVITY at the	work product doctrine; (3) it may	subd. (a)(2));
	PREMISES from April	seek documents and evidence	3. All objections are made
	23, 2018 to April	protected from disclosure by the	without connecting the
	22, 2019 exceeded	attorney-client privilege; (4) it may	questions to any specific
	\$3,000,001.	seek documents and evidence	ground for the objection.
		protected from disclosure by other	(Code Civ. Proc., § 2033.230,
		privileges or doctrines that are not	subd. (b).)
		readily apparent given the broad	
		scope of the request.	
	<b><u>REQUEST FOR</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
	<b><u>ADMISSION NO. 17:</u></b>	Responding Party objects to this	1. The answer to the request
	Admit that the GROSS	request on the following grounds:	is evasive and incomplete
	REVENUE YOU	(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
	received from	burdensome, and lacks reasonable	subd. (a)(1)),
	COMMERCIAL	particularity; (2) it may seek	2. The objections are without
	MANUFACTURING	documents and evidence protected	merit and are too general
	CANNABIS	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
	ACTIVITY at the	work product doctrine; (3) it may	subd. (a)(2));
	PREMISES in the	seek documents and evidence	3. All objections are made
	period from April 23,	protected from disclosure by the	without connecting the
	2018 to April 22, 2019	attorney-client privilege; (4) it may	questions to any specific
	exceeded \$5,000,001.	seek documents and evidence	ground for the objection.
		protected from disclosure by other	(Code Civ. Proc., § 2033.230,
		privileges or doctrines that are not	subd. (b).)
		readily apparent given the broad	
		scope of the request.	

	readily apparent given the broad scope of the request.	
<b><u>REQUEST FOR ADMISSION NO. 18:</u></b> Admit that the GROSS REVENUE YOU received from COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019 exceeded \$10,000,000.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)); 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
<b><u>REQUEST FOR ADMISSION NO. 19:</u></b> Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to October 2, 2019.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)); 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
<b><u>REQUEST FOR ADMISSION NO. 20:</u></b> Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)); 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)

<p><b><u>REQUEST FOR ADMISSION NO. 21:</u></b> Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to October 2, 2019.</p>	<p><b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.</p>	<p><b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)</p>
<p><b><u>REQUEST FOR ADMISSION NO. 22:</u></b> Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from PREMISES, on at least 100 separate days, in the period from April 23, 2018 to October 2, 2019.</p>	<p><b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.</p>	<p><b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)</p>
<p><b><u>REQUEST FOR ADMISSION NO. 23:</u></b> Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to October 2, 2019.</p>	<p><b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.</p>	<p><b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)</p>
<p><b><u>REQUEST FOR ADMISSION NO. 24:</u></b> Admit that YOU</p>	<p><b><u>Response</u></b> Responding Party objects to this request on the following grounds:</p>	<p><b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete</p>

1	engaged in	(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
2	COMMERCIAL	burdensome, and lacks reasonable	subd. (a)(1)),
3	DISTRIBUTOR	particularity; (2) it may seek	2. The objections are without
4	CANNABIS	documents and evidence protected	merit and are too general
5	ACTIVITY	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
6	at, to, or from the	work product doctrine; (3) it may	subd. (a)(2));
7	PREMISES, on at least	seek documents and evidence	3. All objections are made
8	300 separate days, in	protected from disclosure by the	without connecting the
9	the period from April	attorney-client privilege; (4) it may	questions to any specific
10	23, 2018 to October 2,	seek documents and evidence	ground for the objection.
11	2019.	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
12		privileges or doctrines that are not	subd. (b).)
13		readily apparent given the broad	
14		scope of the request.	
15	<b><u>REQUEST FOR</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
16	<b><u>ADMISSION NO. 25:</u></b>	Responding Party objects to this	1. The answer to the request
17	Admit that YOU	request on the following grounds:	is evasive and incomplete
18	engaged in	(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
19	COMMERCIAL	burdensome, and lacks reasonable	subd. (a)(1)),
20	DISTRIBUTOR	particularity; (2) it may seek	2. The objections are without
21	CANNABIS	documents and evidence protected	merit and are too general
22	ACTIVITY at, to, or	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
23	from the PREMISES,	work product doctrine; (3) it may	subd. (a)(2));
24	on at least 400 separate	seek documents and evidence	3. All objections are made
25	days, in the period from	protected from disclosure by the	without connecting the
26	April 23, 2018 to	attorney-client privilege; (4) it may	questions to any specific
27	October 2, 2019.	seek documents and evidence	ground for the objection.
28		protected from disclosure by other	(Code Civ. Proc., § 2033.230,
		privileges or doctrines that are not	subd. (b).)
		readily apparent given the broad	
		scope of the request.	
	<b><u>REQUEST FOR</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
	<b><u>ADMISSION NO. 26:</u></b>	Responding Party objects to this	1. The answer to the request
	Admit that YOU	request on the following grounds:	is evasive and incomplete
	engaged in	(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
	COMMERCIAL	burdensome, and lacks reasonable	subd. (a)(1)),
	DISTRIBUTOR	particularity; (2) it may seek	2. The objections are without
	CANNABIS	documents and evidence protected	merit and are too general
	ACTIVITY at, to, or	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
	from the PREMISES,	work product doctrine; (3) it may	subd. (a)(2));
	on at least 500 separate	seek documents and evidence	3. All objections are made
	days, in the period from	protected from disclosure by the	without connecting the
	April 23, 2018 to	attorney-client privilege; (4) it may	questions to any specific
	October 2, 2019.	seek documents and evidence	ground for the objection.
		protected from disclosure by other	(Code Civ. Proc., § 2033.230,
		privileges or doctrines that are not	subd. (b).)
		readily apparent given the broad	
		scope of the request.	
	<b><u>REQUEST FOR</u></b>	<b><u>Response</u></b>	<b><u>Basis for Further Response</u></b>
	<b><u>ADMISSION NO. 27:</u></b>	Responding Party objects to this	1. The answer to the request
	Admit that YOU	request on the following grounds:	is evasive and incomplete
	engaged in	(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
	COMMERCIAL	burdensome, and lacks reasonable	subd. (a)(1)),
	DISTRIBUTOR	particularity; (2) it may seek	2. The objections are without

1 2 3 4 5 6	CANNABIS ACTIVITY at, to, or from the PREMISES, on 527 separate days, in the period from April 23, 2018 to October 2, 2019.	documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
7 8 9 10 11 12 13 14	<b><u>REQUEST FOR</u></b> <b><u>ADMISSION NO. 28:</u></b> Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April 22, 2019 was more than \$1,000,000.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
15 16 17 18 19 20 21 22 23	<b><u>REQUEST FOR</u></b> <b><u>ADMISSION NO. 29:</u></b> Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April 22, 2019 was more than \$2,500,000.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
24 25 26 27 28	<b><u>REQUEST FOR</u></b> <b><u>ADMISSION NO. 30:</u></b> Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2));

1 2 3 4	ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April 22, 2019 was more than \$5,000,000.	seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
5 6 7 8 9 10 11 12 13	<b><u>REQUEST FOR ADMISSION NO. 31:</u></b> Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April 22, 2019 was more than \$10,000,000.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
14 15 16 17 18 19 20 21	<b><u>REQUEST FOR ADMISSION NO. 32:</u></b> Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April 22, 2019 was more than \$20,000,000.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
22 23 24 25 26 27 28	<b><u>REQUEST FOR ADMISSION NO. 33:</u></b> Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23,	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific

1 2 3	2018 to April 22, 2019 was more than \$30,000,000.	seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
4 5 6 7 8 9 10 11	<b><u>REQUEST FOR</u></b> <b><u>ADMISSION NO. 34:</u></b> Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019 was more than \$50,000,000.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)
12 13 14 15 16 17 18 19 20	<b><u>REQUEST FOR</u></b> <b><u>ADMISSION NO. 35:</u></b> Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019 was more than \$70,000,000.	<b><u>Response</u></b> Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may seek documents and evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence protected from disclosure by other privileges or doctrines that are not readily apparent given the broad scope of the request.	<b><u>Basis for Further Response</u></b> 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2)); 3. All objections are made without connecting the questions to any specific ground for the objection. (Code Civ. Proc., § 2033.230, subd. (b).)

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1 Dated: February 2, 2022

Respectfully Submitted,

2 ROB BONTA  
3 Attorney General of California  
4 HARINDER KAPUR  
5 Senior Assistant Attorney General



6  
7 ETHAN A. TURNER  
8 MICHAEL J. YUN  
9 Deputy Attorney Generals  
10 *Attorneys for Plaintiff California*  
11 *Department of Cannabis Control*  
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**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 ARUTYUN BARSAMYAN; 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:

Party	Address
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