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11	SUPERIOR COURT OF TH	E STATE OF CALIFORNIA	
12			
	COUNTY OF LOS ANGELES		
13	NORTH VALLEY DISTRICT – 0	CHAISWORTH COURTHOUSE	
14			
15	CALIFORNIA DEPARTMENT OF	Case No. 20CHCV00560	
16	I THE ANNARISE TONIRUI.	SEPARATE STATEMENT OF ISSUES IN	
17	Plaintiffs	SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES AND REQUEST	
18	, in the second	FOR SANCTIONS	
19	V.	Date: May 25, 2022 (To be heard on May 26, 2022 – Six Motions)	
20	VERTICAL BLISS, INC., KUSHY PUNCH, INC., CONGLOMERATE	Time: 8:30 a.m. Dept: F49	
21	MARKETING, LLC, MORE AGENCY, INC., RUBEN KACHIAN	Judge: The Honorable Stephen P. Pfahler	
22	aka RUBEN CROSS, ARUTYUN BARSAMYAN, KEVIN HALLORAN,	Trial Date: June 13, 2022 Action Filed: September 23, 2020	
23	MIKE A. TOROYAN, and DOES 1	•	
24	• • • • • • • • • • • • • • • • • • •	RESERVATION NO. 568594989436	
25	Defendant		
26			
27	11111		
28			

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**FORM** 

NO. 1.1

State the name,

number, and

ADDRESS, telephone

relationship to you of

prepared or assisted in

the preparation of the

interrogatories. (Do not

identify anyone who

simply typed or

reproduced the

responses.)

responses to these

each PERSON who

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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

## Response Responding Party objects to this INTERROGATORY

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.

## **Basis for Further Response**

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."

1 **Basis for Further Response** Response **FORM** Responding Party objects to this 1. The answer given was not INTERROGATORY 2 request on the following grounds: made under oath (Code Civ. NO. 2.1 (1) it is overbroad, unduly Proc § 2030.210, subd. (a)). State: 3 burdensome, and lacks reasonable 2. No responsive information (a) your name; is provided (Code Civ. Proc. particularity; (2) it may seek (b) every name you 4 documents and evidence protected § 2030.210, subd. (a)(1)), have used in the past; from disclosure by the attorney 3. The objections are without 5 work product doctrine; (3) it may merit and are too general and seek documents and evidence (Code Civ. Proc., § 2030.300, (c) the dates you used 6 protected from disclosure by the subd. (a)(3); each name. 4. All objections are without attorney-client privilege; (4) it may 7 seek documents and evidence merit and too general (Code protected from disclosure by other Civ. Proc., §§ 2030.240, 8 privileges or doctrines that are not subd. (b), 23030.300, subd. readily apparent given the broad (a)(3).9 5. The answer is evasive and scope of the request. incomplete (Code Civ. Proc. 10 § 2030.300, subd. (a) **Basis for Further Response FORM** Response 11 Responding Party objects to this 1. The answer given was not INTEROGATORY request on the following grounds: made under oath (Code Civ. NO. 2.2: 12 Proc § 2030.210, subd. (a)). (1) it is overbroad, unduly State the date and place burdensome, and lacks reasonable 2. No responsive information of your birth. 13 particularity; (2) it may seek is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)), 3. The objections are without documents and evidence protected 14 from disclosure by the attorney work product doctrine; (3) it may merit and are too general 15 seek documents and evidence (Code Civ. Proc., § 2030.300, protected from disclosure by the subd. (a)(3); 16 attorney-client privilege; (4) it may 4. All objections are without seek documents and evidence merit and too general (Code 17 protected from disclosure by other Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd. privileges or doctrines that are not 18 readily apparent given the broad (a)(3).scope of the request. 5. The answer is evasive and 19 incomplete (Code Civ. Proc. § 2030.300, subd. (a).) 20 **Basis for Further Response** Response **FORM** Responding Party objects to this 1. The answer given was not INTEROGATORY 21 made under oath (Code Civ. request on the following grounds: NO. 2.5: (1) it is overbroad, unduly Proc § 2030.210, subd. (a)). State: 22 burdensome, and lacks reasonable 2. No responsive information (a) your present is provided (Code Civ. Proc. particularity; (2) it may seek residence ADDRESS; 23 documents and evidence protected § 2030.210, subd. (a)(1)), 3. The objections are without (b) your residence from disclosure by the attorney 24 work product doctrine; (3) it may merit and are too general ADDRESSES for the seek documents and evidence (Code Civ. Proc., § 2030.300, past five years; and 25 protected from disclosure by the subd. (a)(3); (c) the dates you lived 4. All objections are without attorney-client privilege; (4) it may at each ADDRESS. 26 seek documents and evidence merit and too general (Code Civ. Proc., §§ 2030.240, protected from disclosure by other 27 privileges or doctrines that are not subd. (b), 23030.300, subd. readily apparent given the broad 28 scope of the request. 5. The answer is evasive and

1			incomplete (Code Civ. Proc. § 2030.300, subd. (a).)
2	FORM	Response	Basis for Further Response
3	INTEROGATORY	Responding Party objects to this	1. The answer given was not
3	NO. 2.6:	request on the following grounds: (1) it is overbroad, unduly	made under oath (Code Civ. Proc § 2030.210, subd. (a)).
4	State:	burdensome, and lacks reasonable	2. No responsive information
5	(a) the name, ADDRESS, and	particularity; (2) it may seek documents and evidence protected	is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)),
6	telephone number of your present employer	from disclosure by the attorney work product doctrine; (3) it may	3. The objections are without merit and are too general
7	or place of self-employment; and	seek documents and evidence protected from disclosure by the	(Code Civ. Proc., § 2030.300, subd. (a)(3));
8	(b) the name, ADDRESS, dates of	attorney-client privilege; (4) it may seek documents and evidence	4. All objections are without merit and too general (Code
9	employment, job title,	protected from disclosure by other privileges or doctrines that are not	Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd.
10	and nature of work for each employer or self-	readily apparent given the broad scope of the request.	(a)(3).) 5. The answer is evasive and
11	employment you have had from five years		incomplete (Code Civ. Proc. § 2030.300, subd. (a).)
12	before the INCIDENT		
13	until today.  FORM	Response	Basis for Further Response
14	INTEROGATORY NO. 2.7	Responding Party objects to this request on the following grounds:	1. The answer given was not made under oath (Code Civ.
15	State:	(1) it is overbroad, unduly burdensome, and lacks reasonable	Proc § 2030.210, subd. (a)). 2. No responsive information
16	(a) the name and ADDRESS of each	particularity; (2) it may seek documents and evidence protected	is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)),
17	school or other academic or vocational	from disclosure by the attorney work product doctrine; (3) it may	3. The objections are without merit and are too general
18	institution you have attended,	seek documents and evidence protected from disclosure by the	(Code Civ. Proc., § 2030.300, subd. (a)(3));
19	beginning with high school;	attorney-client privilege; (4) it may seek documents and evidence	4. All objections are without merit and too general (Code
20	(b) the dates you	protected from disclosure by other privileges or doctrines that are not	Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd.
21	attended; (c) the highest grade	readily apparent given the broad scope of the request.	(a)(3).) 5. The answer is evasive and
22	level you have completed; and		incomplete (Code Civ. Proc. § 2030.300, subd. (a).)
23	(d) the degrees		
	received.	Rasnonsa	Basis for Further Response
24	FORM INTERROGATORY	Responding Party objects to this	1. The answer given was not
25	NO. 2.8:	request on the following grounds: (1) it is overbroad, unduly	made under oath (Code Civ. Proc § 2030.210, subd. (a)).
26	Have you ever been convicted of a felony?	burdensome, and lacks reasonable	2. No responsive information
27	If so, for each	particularity; (2) it may seek documents and evidence protected	is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)),
28	conviction state: (a) the city and state	from disclosure by the attorney work product doctrine; (3) it may	3. The objections are without merit and are too general
- 11	() 525	4	

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

1 § 2030.210, subd. (a)(1)), 3. The objections are without documents and evidence protected employee for any from disclosure by the attorney PERSON? If so, state: 2 work product doctrine; (3) it may merit and are too general (a) the name, seek documents and evidence (Code Civ. Proc., § 2030.300, ADDRESS, and 3 protected from disclosure by the subd. (a)(3); telephone number of attorney-client privilege; (4) it may 4. All objections are without 4 that PERSON; and seek documents and evidence merit and too general (Code (b) a description of your protected from disclosure by other Civ. Proc., §§ 2030.240, 5 subd. (b), 23030.300, subd. privileges or doctrines that are not duties. readily apparent given the broad (a)(3).6 5. The answer is evasive and scope of the request. incomplete (Code Civ. Proc. 7 § 2030.300, subd. (a).) **Basis for Further Response FORM** Response 8 Responding Party objects to this 1. The answer given was not INTERROGATORY made under oath (Code Civ. request on the following grounds: NO. 3.1 9 (1) it is overbroad, unduly Proc § 2030.210, subd. (a)). Are you a corporation? burdensome, and lacks reasonable 2. No responsive information If so, state: 10 particularity; (2) it may seek is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)), (a) the name stated in documents and evidence protected 11 the current articles of from disclosure by the attorney 3. The objections are without work product doctrine; (3) it may merit and are too general incorporation; 12 seek documents and evidence (Code Civ. Proc., § 2030.300, (b) all other names used protected from disclosure by the subd. (a)(3); by the corporation 13 attorney-client privilege; (4) it may 4. All objections are without during the past 10 years seek documents and evidence merit and too general (Code and the dates each Civ. Proc., §§ 2030.240, 14 protected from disclosure by other was used: subd. (b), 23030.300, subd. privileges or doctrines that are not 15 readily apparent given the broad (a)(3).)(c) the date and place of scope of the request. 5. The answer is evasive and incorporation; 16 incomplete (Code Civ. Proc. (d) the ADDRESS of § 2030.300, subd. (a).) the principal place of 17 business; and (e) whether you are 18 qualified to do business 19 in California. **Basis for Further Response** Response **FORM** 20 Responding Party objects to this 1. The answer given was not **INTERROGATORY** made under oath (Code Civ. request on the following grounds: NO. 3.2 21 (1) it is overbroad, unduly Proc § 2030.210, subd. (a)). Are you a partnership? burdensome, and lacks reasonable 2. No responsive information 22 If so, state: particularity; (2) it may seek is provided (Code Civ. Proc. (a) the current documents and evidence protected § 2030.210, subd. (a)(1)), 23 partnership name; from disclosure by the attorney 3. The objections are without work product doctrine; (3) it may merit and are too general (b) all other names used 24 seek documents and evidence (Code Civ. Proc., § 2030.300, by the partnership protected from disclosure by the subd. (a)(3); during the past 10 years 25 attorney-client privilege; (4) it may 4. All objections are without and the dates each seek documents and evidence merit and too general (Code 26 was used; protected from disclosure by other Civ. Proc., §§ 2030.240, (c) whether you are a privileges or doctrines that are not subd. (b), 23030.300, subd. 27 readily apparent given the broad limited partnership and (a)(3).5. The answer is evasive and scope of the request. if so, under the laws of 28

1	what jurisdiction;		incomplete (Code Civ. Proc.
2	(d) the name and		§ 2030.300, subd. (a).)
2	ADDRESS of each		
3	general partner; and (e) the ADDRESS of		
4	the principal place of		
_	business.		
5	<u>FORM</u>	Response  Response  Response  Response  Response  Response	Basis for Further Response
6	INTERROGATORY NO. 3.3	Responding Party objects to this request on the following grounds:	1. The answer given was not made under oath (Code Civ.
7	Are you a limited	(1) it is overbroad, unduly	Proc § 2030.210, subd. (a)).
/	liability company? If	burdensome, and lacks reasonable	2. No responsive information
8	so, state:	particularity; (2) it may seek documents and evidence protected	is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)),
J	(a) the name stated in	from disclosure by the attorney	3. The objections are without
9	the current articles of	work product doctrine; (3) it may seek documents and evidence	merit and are too general (Code Civ. Proc., § 2030.300,
10	organization; (b) all other names used	protected from disclosure by the attorney-client privilege; (4) it may	subd. (a)(3)); 4. All objections are without
11	by the company during the past 10 years and	seek documents and evidence protected from disclosure by other	merit and too general (Code Civ. Proc., §§ 2030.240,
12	the dates each	privileges or doctrines that are not	subd. (b), 23030.300, subd.
	was used;	readily apparent given the broad	(a)(3).
13	(c) the date and place of	scope of the request.	5. The answer is evasive and
14	filing of the articles of		incomplete (Code Civ. Proc.
14	organization;		§ 2030.300, subd. (a).)
15	(d) the ADDRESS of		
-	the principal place of		
16	business; and		
17	(e) whether you are		
17	qualified to do business		
18	in California.		
10	<u>FORM</u>	Response	<b>Basis for Further Response</b>
19	INTERROGATORY	Responding Party objects to this request on the following grounds:	1. The answer given was not made under oath (Code Civ.
20	NO. 3.4	(1) it is overbroad, unduly	Proc § 2030.210, subd. (a)).
20	Are you a joint venture?	burdensome, and lacks reasonable	2. No responsive information
21	If so, state:	particularity; (2) it may seek	is provided (Code Civ. Proc.
	(a) the current joint	documents and evidence protected	§ 2030.210, subd. (a)(1)),
22	venture name;	from disclosure by the attorney work product doctrine; (3) it may	3. The objections are without
22	(b) all other names used	seek documents and evidence	merit and are too general (Code Civ. Proc., § 2030.300,
23	by the joint venture during the past 10 years	protected from disclosure by the	subd. (a)(3));
24	and the dates	attorney-client privilege; (4) it may	4. All objections are without
	each was used;	seek documents and evidence	merit and too general (Code
25	(c) the name and	protected from disclosure by other	Civ. Proc., §§ 2030.240,
2.5	ADDRESS of each	privileges or doctrines that are not readily apparent given the broad	subd. (b), 23030.300, subd. (a)(3).)
26	joint venture; and	scope of the request.	5. The answer is evasive and
27	(d) the ADDRESS of	stope of the request.	incomplete (Code Civ. Proc.
27			§ 2030.300, subd. (a).)
28	the principal place of		
-0	I	7	

1	business.		
2	FORM	Response	<b>Basis for Further Response</b>
_	INTERROGATORY	Responding Party objects to this request on the following grounds:	1. The answer given was not made under oath (Code Civ.
3	NO. 3.5 ARE YOU AN	(1) it is overbroad, unduly	Proc § 2030.210, subd. (a)).
	unincorporated	burdensome, and lacks reasonable	2. No responsive information
4	association? If so, state:	particularity; (2) it may seek	is provided (Code Civ. Proc.
5	(a) the current	documents and evidence protected	§ 2030.210, subd. (a)(1)),
3	unincorporated	from disclosure by the attorney	3. The objections are without
6	association name;	work product doctrine; (3) it may seek documents and evidence	merit and are too general (Code Civ. Proc., § 2030.300,
	(b) all other names used	protected from disclosure by the	subd. (a)(3));
7	by the unincorporated	attorney-client privilege; (4) it may	4. All objections are without
0	association during the	seek documents and evidence	merit and too general (Code
8	past 10 years and	protected from disclosure by other	Civ. Proc., §§ 2030.240,
9	the dates each was	privileges or doctrines that are not	subd. (b), 23030.300, subd.
	used;	readily apparent given the broad scope of the request.	(a)(3).) 5. The answer is evasive and
10		scope of the request.	incomplete (Code Civ. Proc.
			§ 2030.300, subd. (a).)
11	<u>FORM</u>	Response	<b>Basis for Further Response</b>
12	<b>INTERROGATORY</b>	Responding Party objects to this	1. The answer given was not
12	NO. 3.5	request on the following grounds: (1) it is overbroad, unduly	made under oath (Code Civ. Proc § 2030.210, subd. (a)).
13	Are you an	burdensome, and lacks reasonable	2. No responsive information
	unincorporated	particularity; (2) it may seek	is provided (Code Civ. Proc.
14	association? If so, state:	documents and evidence protected	§ 2030.210, subd. (a)(1)),
15	(a) the current	from disclosure by the attorney	3. The objections are without
13	unincorporated	work product doctrine; (3) it may	merit and are too general
16	association name;	seek documents and evidence protected from disclosure by the	(Code Civ. Proc., § 2030.300, subd. (a)(3));
	(b) all other names used	attorney-client privilege; (4) it may	4. All objections are without
17	by the unincorporated	seek documents and evidence	merit and too general (Code
18	association during the	protected from disclosure by other	Civ. Proc., §§ 2030.240,
10	past 10 years and	privileges or doctrines that are not	subd. (b), 23030.300, subd.
19	the dates each was	readily apparent given the broad	(a)(3).) 5. The answer is evasive and
	used;	scope of the request.	incomplete (Code Civ. Proc.
20			§ 2030.300, subd. (a).)
21	FORM	Response	<b>Basis for Further Response</b>
21	<b>INTERROGATORY</b>	Responding Party objects to this	1. The answer given was not
22	NO. 3.6	request on the following grounds: (1) it is overbroad, unduly	made under oath (Code Civ. Proc § 2030.210, subd. (a)).
	Have you done business	burdensome, and lacks reasonable	2. No responsive information
23	under a fictitious name	particularity; (2) it may seek	is provided (Code Civ. Proc.
24	during the past 10	documents and evidence protected	§ 2030.210, subd. (a)(1)),
∠ <del>4</del>	years? If so, for each	from disclosure by the attorney	3. The objections are without
25	fictitious name state:	work product doctrine; (3) it may seek documents and evidence	merit and are too general
-	(a) the name;	protected from disclosure by the	(Code Civ. Proc., § 2030.300, subd. (a)(3));
26	(b) the dates each was	attorney-client privilege; (4) it may	4. All objections are without
27	used;	seek documents and evidence	merit and too general (Code
27	(c) the state and county	protected from disclosure by other	Civ. Proc., §§ 2030.240,
28	of each fictitious name	privileges or doctrines that are not	subd. (b), 23030.300, subd.
!!		0	

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
2	the principal place of		incomplete (Code Civ. Proc. § 2030.300, subd. (a).)
3	business.		<i>y</i> 2050.500, subt. (a).)
4	FORM DITTERPROGRATION	Response Responding Party objects to this	Basis for Further Response  1. The answer given was not
5	INTERROGATORY NO. 3.7	request on the following grounds: (1) it is overbroad, unduly	made under oath (Code Civ. Proc § 2030.210, subd. (a)).
6	Within the past five years has any public	burdensome, and lacks reasonable particularity; (2) it may seek	2. No responsive information is provided (Code Civ. Proc.
7	entity registered or licensed your business?	documents and evidence protected from disclosure by the attorney	§ 2030.210, subd. (a)(1)), 3. The objections are without
8	If so,	work product doctrine; (3) it may	merit and are too general
9	for each license or registration:	seek documents and evidence protected from disclosure by the	(Code Civ. Proc., § 2030.300, subd. (a)(3));
10	(a) identify the license	attorney-client privilege; (4) it may seek documents and evidence	4. All objections are without merit and too general (Code
11	or registration; (b) state the name of the	protected from disclosure by other privileges or doctrines that are not	Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd.
12	public entity; and (c) state the dates of	readily apparent given the broad scope of the request.	(a)(3).) 5. The answer is evasive and
13	issuance and expiration.		incomplete (Code Civ. Proc. § 2030.300, subd. (a).)
1.4	<u>FORM</u>	Response	Basis for Further Response
14	INTERROGATORY NO. 4.1	Responding Party objects to this request on the following grounds:	1. The answer given was not made under oath (Code Civ.
15	NO. 4.1 At the time of the	(1) it is overbroad, unduly burdensome, and lacks reasonable	Proc § 2030.210, subd. (a)). 2. No responsive information
16	INCIDENT, was there in effect any policy of	particularity; (2) it may seek documents and evidence protected	is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)),
17	insurance through which	from disclosure by the attorney work product doctrine; (3) it may	3. The objections are without merit and are too general
18	you were or might be	seek documents and evidence protected from disclosure by the	(Code Civ. Proc., § 2030.300, subd. (a)(3));
19	insured in any manner (for example, primary,	attorney-client privilege; (4) it may seek documents and evidence	4. All objections are without merit and too general (Code
20	pro-rata, or excess liability	protected from disclosure by other privileges or doctrines that are not	Civ. Proc., §§ 2030.240, subd. (b), 23030.300, subd.
21	coverage or medical	readily apparent given the broad	(a)(3).) 5. The answer is evasive and
22	expense coverage) for the damages, claims, or	scope of the request.	incomplete (Code Civ. Proc.
23	actions that have arisen out of		§ 2030.300, subd. (a).)
24	the INCIDENT? If so,		
25	for each policy state: (a) the kind of		
	coverage;		
26	(b) the name and		
27	ADDRESS of the insurance company;		
28	(c) the name,		

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

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

1 2	response and state the name,		
3	ADDRESS, and telephone number of the PERSON who has		
4	each		
5	DOCUMENT or thing.		
6			
7	Requests for	Admissions Served on Counsel for A	Arutyun Barsamyan
8	REQUEST FOR	Response Responding Party objects to this	Basis for Further Response  1. The answer to the request
9	ADMISSION NO. 1: Is your response to each	request on the following grounds: (1) it is overbroad, unduly	is evasive and incomplete (Code Civ. Proc. § 2033.290,
10	request for admission served with these	burdensome, and lacks reasonable particularity; (2) it may seek	subd. (a)(1)), 2. The objections are without
11	interrogatories an unqualified admission?	documents and evidence protected from disclosure by the attorney	merit and are too general (Code Civ. Proc., § 2033.290,
12	If not, for each response	work product doctrine; (3) it may seek documents and evidence	subd. (a)(2)); 3. All objections are made
13	that is not an unqualified admission:	protected from disclosure by the	without connecting the
14	(a) state the number of the request;	attorney-client privilege; (4) it may seek documents and evidence	questions to any specific ground for the objection.
15	(b) state all facts upon	protected from disclosure by other privileges or doctrines that are not	(Code Civ. Proc., § 2033.230, subd. (b).)
16	which you base your response;	readily apparent given the broad scope of the request.	
17	(c) state the names, ADDRESSES, and		
18	telephone numbers of all PERSONS who		
19	have		
20	knowledge of those facts; and		
21	(d) identify all DOCUMENTS and		
22	other tangible things		
23	that support your response		
24	and state the name, ADDRESS, and		
25	telephone number of		
26	the PERSON who has each		
27	DOCUMENT or thing.		
28		12	

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

1	engaged in	(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
2	COMMERCIAL MANUFACTURING	burdensome, and lacks reasonable particularity; (2) it may seek	subd. (a)(1)), 2. The objections are without
3	CANNABIS	documents and evidence protected from disclosure by the attorney	merit and are too general (Code Civ. Proc., § 2033.290,
4	ACTIVITY at the PREMISES at some	work product doctrine; (3) it may seek documents and evidence	subd. (a)(2)); 3. All objections are made
	point in the period from	protected from disclosure by the	without connecting the
5	April 23, 2018 to October 2, 2019.	attorney-client privilege; (4) it may seek documents and evidence	questions to any specific ground for the objection.
6	October 2, 2019.	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
7		privileges or doctrines that are not readily apparent given the broad	subd. (b).)
0		scope of the request.	
8	REQUEST FOR ADMISSION NO. 6:	Response Responding Party objects to this	Basis for Further Response  1. The answer to the request
9	Admit that YOU	request on the following grounds: (1) it is overbroad, unduly	is evasive and incomplete (Code Civ. Proc. § 2033.290,
10	engaged in COMMERCIAL	burdensome, and lacks reasonable	subd. (a)(1)),
11	MANUFACTURING	particularity; (2) it may seek documents and evidence protected	2. The objections are without merit and are too general
12	CANNABIS	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
	ACTIVITY at the PREMISES, on at least	work product doctrine; (3) it may seek documents and evidence	subd. (a)(2)); 3. All objections are made
13	50 separate days, at	protected from disclosure by the attorney-client privilege; (4) it may	without connecting the questions to any specific
14	some point in the period	seek documents and evidence	ground for the objection.
15	from April 23, 2018 to October 2,	protected from disclosure by other privileges or doctrines that are not	(Code Civ. Proc., § 2033.230, subd. (b).)
	2019.	readily apparent given the broad	
16	DECLIESE FOR	scope of the request.	
17	REQUEST FOR ADMISSION NO. 7:	Response Responding Party objects to this	Basis for Further Response  1. The answer to the request
18	Admit that YOU	request on the following grounds: (1) it is overbroad, unduly	is evasive and incomplete
19	engaged in	burdensome, and lacks reasonable	(Code Civ. Proc. § 2033.290, subd. (a)(1)),
19	COMMERCIAL MANUFACTURING	particularity; (2) it may seek documents and evidence protected	2. The objections are without merit and are too general
20	CANNABIS	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
21	ACTIVITY at the PREMISES, on at least	work product doctrine; (3) it may seek documents and evidence	subd. (a)(2)); 3. All objections are made
22	100 separate days, at	protected from disclosure by the	without connecting the
	some point in the period	attorney-client privilege; (4) it may seek documents and evidence	questions to any specific ground for the objection.
23	from April 23, 2018 to	protected from disclosure by other privileges or doctrines that are not	(Code Civ. Proc., § 2033.230, subd. (b).)
24	October 2, 2019.	readily apparent given the broad	5404. (0).)
25	REQUEST FOR	scope of the request.  Response	1. The answer to the request
26	ADMISSION NO. 8:	Responding Party objects to this	is evasive and incomplete
	Admit that YOU	request on the following grounds: (1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290, subd. (a)(1)),
27	engaged in COMMERCIAL	burdensome, and lacks reasonable	2. The objections are without
28		particularity; (2) it may seek  14	merit and are too general
		14	

1	MANUFACTURING	documents and evidence protected	(Code Civ. Proc., § 2033.290,
2	CANNABIS	from disclosure by the attorney work product doctrine; (3) it may	subd. (a)(2)); 3. All objections are made
	ACTIVITY at the	seek documents and evidence	without connecting the
3	PREMISES, on at least 200 separate days, at	protected from disclosure by the	questions to any specific
4	some point in the period	attorney-client privilege; (4) it may seek documents and evidence	ground for the objection. (Code Civ. Proc., § 2033.230,
7	from	protected from disclosure by other	subd. (b).)
5	April 23, 2018 to	privileges or doctrines that are not	
6	October 2, 2019.	readily apparent given the broad	
0	REQUEST FOR	scope of the request.  Response	Basis for Further Response
7	ADMISSION NO. 9:	Responding Party objects to this	1. The answer to the request
8	Admit that YOU	request on the following grounds:	is evasive and incomplete
8	engaged in	(1) it is overbroad, unduly burdensome, and lacks reasonable	(Code Civ. Proc. § 2033.290, 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
10	CANNABIS ACTIVITY at the	from disclosure by the attorney work product doctrine; (3) it may	(Code Civ. Proc., § 2033.290, subd. (a)(2));
11	PREMISES, on at least	seek documents and evidence	3. All objections are made
10	300 separate days, at	protected from disclosure by the	without connecting the
12	some point in the period	attorney-client privilege; (4) it may seek documents and evidence	questions to any specific ground for the objection.
13	from April 23, 2018 to	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
	October 2, 2019.	privileges or doctrines that are not	subd. (b).)
14		readily apparent given the broad	
15	REQUEST FOR	scope of the request.  Response	1. The answer to the request
1.6	ADMISSION NO. 10:	Responding Party objects to this	is evasive and incomplete
16	Admit that YOU	request on the following grounds: (1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290, subd. (a)(1)),
17	engaged in	burdensome, and lacks reasonable	2. The objections are without
10	COMMERCIAL	particularity; (2) it may seek	merit and are too general
18	MANUFACTURING	documents and evidence protected	(Code Civ. Proc., § 2033.290,
19	CANNABIS ACTIVITY at the	from disclosure by the attorney work product doctrine; (3) it may	subd. (a)(2)); 3. All objections are made
	PREMISES, on at least	seek documents and evidence	without connecting the
20	400 separate days, at	protected from disclosure by the	questions to any specific
21	some point in the period	attorney-client privilege; (4) it may seek documents and evidence	ground for the objection. (Code Civ. Proc., § 2033.230,
	from April 23, 2018 to	protected from disclosure by other	subd. (b).)
22	October 2, 2019.	privileges or doctrines that are not	
23		readily apparent given the broad scope of the request.	
	REQUEST FOR	Response	<b>Basis for Further Response</b>
24	ADMISSION NO. 11:	Responding Party objects to this	1. The answer to the request
25	Admit that YOU	request on the following grounds:	is evasive and incomplete
	engaged in	(1) it is overbroad, unduly burdensome, and lacks reasonable	(Code Civ. Proc. § 2033.290, 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
۷ /	CANNABIS ACTIVITY at the	from disclosure by the attorney work product doctrine; (3) it may	(Code Civ. Proc., § 2033.290, subd. (a)(2));
28	ACTIVITI at the	` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` ` `	5554. (4)(2)),
•		15	

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

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

1	use dilay ammoment siyyon the house d		
1 readily apparent given the broad			
2	REQUEST FOR	scope of the request.  Response	Basis for Further Response
	ADMISSION NO. 18:	Responding Party objects to this	1. The answer to the request
3	Admit that the GROSS	request on the following grounds:	is evasive and incomplete
4	REVENUE YOU	(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
7	received from	burdensome, and lacks reasonable particularity; (2) it may seek	subd. (a)(1)), 2. The objections are without
5	COMMERCIAL	documents and evidence protected	merit and are too general
	MANUFACTURING	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
6	CANNABIS	work product doctrine; (3) it may	subd. (a)(2));
7	ACTIVITY at the	seek documents and evidence protected from disclosure by the	3. All objections are made without connecting the
,	PREMISES in the	attorney-client privilege; (4) it may	questions to any specific
8	period from April 23,	seek documents and evidence	ground for the objection.
0	2018 to April 22, 2019	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
9	exceeded \$10,000,000.	privileges or doctrines that are not	subd. (b).)
10		readily apparent given the broad scope of the request.	
	REQUEST FOR	Response	<b>Basis for Further Response</b>
11	ADMISSION NO. 19:	Responding Party objects to this	1. The answer to the request
12	Admit that YOU did	request on the following grounds: (1) it is overbroad, unduly	is evasive and incomplete (Code Civ. Proc. § 2033.290,
12	not have a	burdensome, and lacks reasonable	subd. (a)(1)),
13	COMMERCIAL	particularity; (2) it may seek	2. The objections are without
1.4	CANNABIS LICENSE	documents and evidence protected	merit and are too general
14	to engage in	from disclosure by the attorney work product doctrine; (3) it may	(Code Civ. Proc., § 2033.290, subd. (a)(2));
15	COMMERCIAL DISTRIBUTOR	seek documents and evidence	3. All objections are made
	CANNABIS	protected from disclosure by the	without connecting the
16	ACTIVITY at, to, or	attorney-client privilege; (4) it may	questions to any specific
17	from the PREMISES in	seek documents and evidence protected from disclosure by other	ground for the objection. (Code Civ. Proc., § 2033.230,
1 /	the	privileges or doctrines that are not	subd. (b).)
18	period from April 23,	readily apparent given the broad	
10	2018 to October 2,	scope of the request.	
19	2019.		
20	REQUEST FOR	Response	Basis for Further Response
2.1	ADMISSION NO. 20:	Responding Party objects to this request on the following grounds:	1. The answer to the request is evasive and incomplete
21	Admit that YOU	(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
22	engaged in COMMERCIAL	burdensome, and lacks reasonable	subd. (a)(1)),
	DISTRIBUTOR	particularity; (2) it may seek	2. The objections are without
23	CANNABIS	documents and evidence protected from disclosure by the attorney	merit and are too general (Code Civ. Proc., § 2033.290,
24	ACTIVITY	work product doctrine; (3) it may	subd. (a)(2));
24	at, to, or from the	seek documents and evidence	3. All objections are made
25	PREMISES at some	protected from disclosure by the	without connecting the
	point in the period from	attorney-client privilege; (4) it may seek documents and evidence	questions to any specific ground for the objection.
26	April 23, 2018 to	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
27	October 2, 2019.	privileges or doctrines that are not	subd. (b).)
- '		readily apparent given the broad	
28		scope of the request.	

1	REQUEST FOR	Response	<b>Basis for Further Response</b>
2	<b>ADMISSION NO. 21:</b>	Responding Party objects to this	1. The answer to the request
2	Admit that YOU	request on the following grounds: (1) it is overbroad, unduly	is evasive and incomplete (Code Civ. Proc. § 2033.290,
3	engaged in	burdensome, and lacks reasonable	subd. (a)(1)),
-	COMMERCIAL	particularity; (2) it may seek	2. The objections are without
4	DISTRIBUTOR	documents and evidence protected	merit and are too general
_ ا	CANNABIS	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
5	ACTIVITY	work product doctrine; (3) it may	subd. (a)(2));
6	at, to, or from the	seek documents and evidence protected from disclosure by the	3. All objections are made without connecting the
0	PREMISES, on at least	attorney-client privilege; (4) it may	questions to any specific
7	50 separate days, in the	seek documents and evidence	ground for the objection.
	period from April 23,	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
8	2018 to	privileges or doctrines that are not	subd. (b).)
0	October 2, 2019.	readily apparent given the broad	
9	DEOLIECT FOR	scope of the request.	Basis for Further Response
10	REQUEST FOR	Response Responding Party objects to this	1. The answer to the request
	ADMISSION NO. 22: Admit that YOU	request on the following grounds:	is evasive and incomplete
11		(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
12	engaged in COMMERCIAL	burdensome, and lacks reasonable	subd. (a)(1)),
12	DISTRIBUTOR	particularity; (2) it may seek	2. The objections are without
13	CANNABIS	documents and evidence protected from disclosure by the attorney	merit and are too general (Code Civ. Proc., § 2033.290,
13	ACTIVITY	work product doctrine; (3) it may	subd. (a)(2));
14	at, to, or from	seek documents and evidence	3. All objections are made
	PREMISES, on at least	protected from disclosure by the	without connecting the
15	100 separate days, in	attorney-client privilege; (4) it may	questions to any specific
16	the period from April	seek documents and evidence	ground for the objection.
10	23, 2018 to	protected from disclosure by other privileges or doctrines that are not	(Code Civ. Proc., § 2033.230, subd. (b).)
17	October 2, 2019.	readily apparent given the broad	suod. (b).)
	3010001 2, 2013.	scope of the request.	
18	REQUEST FOR	Response	<b>Basis for Further Response</b>
10	ADMISSION NO. 23:	Responding Party objects to this	1. The answer to the request
19	Admit that YOU	request on the following grounds: (1) it is overbroad, unduly	is evasive and incomplete
20	engaged in	burdensome, and lacks reasonable	(Code Civ. Proc. § 2033.290, subd. (a)(1)),
	COMMERCIAL	particularity; (2) it may seek	2. The objections are without
21	DISTRIBUTOR	documents and evidence protected	merit and are too general
22	CANNABIS	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
22	ACTIVITY at, to, or	work product doctrine; (3) it may	subd. (a)(2));
23	from the PREMISES,	seek documents and evidence protected from disclosure by the	3. All objections are made
23	on at least 200 separate	attorney-client privilege; (4) it may	without connecting the questions to any specific
24	days, in the period from	seek documents and evidence	ground for the objection.
	April 23, 2018 to	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
25	October 2, 2019.	privileges or doctrines that are not	subd. (b).)
26		readily apparent given the broad	
26	DEOLIECT FOR	scope of the request.	Dasis for Funtler Dassers
27	REQUEST FOR	Response Responding Party objects to this	Basis for Further Response  1. The answer to the request
	ADMISSION NO. 24:	request on the following grounds:	is evasive and incomplete
28	Admit that YOU	1 00	2 sara meempreee
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1	engaged in	(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
2	COMMERCIAL DISTRIBUTOR	burdensome, and lacks reasonable particularity; (2) it may seek	subd. (a)(1)), 2. The objections are without
3	CANNABIS	documents and evidence protected from disclosure by the attorney	merit and are too general (Code Civ. Proc., § 2033.290,
	ACTIVITY at, to, or from the	work product doctrine; (3) it may	subd. (a)(2));
4	PREMISES, on at least	seek documents and evidence protected from disclosure by the	3. All objections are made without connecting the
5	300 separate days, in	attorney-client privilege; (4) it may seek documents and evidence	questions to any specific ground for the objection.
6	the period from April 23, 2018 to October 2,	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
7	2019.	privileges or doctrines that are not readily apparent given the broad scope of the request.	subd. (b).)
8	REQUEST FOR	Response	Basis for Further Response
9	ADMISSION NO. 25: Admit that YOU	Responding Party objects to this request on the following grounds:	1. The answer to the request is evasive and incomplete
10	engaged in	(1) it is overbroad, unduly burdensome, and lacks reasonable	(Code Civ. Proc. § 2033.290, subd. (a)(1)),
11	COMMERCIAL DISTRIBUTOR	particularity; (2) it may seek documents and evidence protected	2. The objections are without merit and are too general
12	CANNABIS ACTIVITY at, to, or	from disclosure by the attorney work product doctrine; (3) it may	(Code Civ. Proc., § 2033.290, subd. (a)(2));
13	from the PREMISES, on at least 400 separate	seek documents and evidence protected from disclosure by the	3. All objections are made without connecting the
14	days, in the period from	attorney-client privilege; (4) it may seek documents and evidence	questions to any specific ground for the objection.
15	April 23, 2018 to October 2, 2019.	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
	October 2, 2019.	privileges or doctrines that are not readily apparent given the broad	subd. (b).)
16	DECLIESE FOR	scope of the request.	Davis for Fronth or Dosmons
17	REQUEST FOR ADMISSION NO. 26:	Responding Party objects to this	Basis for Further Response  1. The answer to the request
18	Admit that YOU	request on the following grounds: (1) it is overbroad, unduly	is evasive and incomplete (Code Civ. Proc. § 2033.290,
19	engaged in COMMERCIAL	burdensome, and lacks reasonable	subd. (a)(1)),
	DISTRIBUTOR	particularity; (2) it may seek documents and evidence protected	2. The objections are without merit and are too general
20	CANNABIS ACTIVITY	from disclosure by the attorney work product doctrine; (3) it may	(Code Civ. Proc., § 2033.290, subd. (a)(2));
21	at, to, or from the	seek documents and evidence	3. All objections are made
22	PREMISES, on at least	protected from disclosure by the attorney-client privilege; (4) it may	without connecting the questions to any specific
23	500 separate days, in the period from April	seek documents and evidence protected from disclosure by other	ground for the objection. (Code Civ. Proc., § 2033.230,
	23, 2018 to	privileges or doctrines that are not	subd. (b).)
24	October 2, 2019.	readily apparent given the broad scope of the request.	
25	REQUEST FOR	Response	Basis for Further Response
26	Admit that YOU	Responding Party objects to this request on the following grounds:  (1) it is overbroad unduly	1. The answer to the request is evasive and incomplete
27	engaged in COMMERCIAL	(1) it is overbroad, unduly burdensome, and lacks reasonable	(Code Civ. Proc. § 2033.290, subd. (a)(1)),
28	DISTRIBUTOR	particularity; (2) it may seek	2. The objections are without
"		20	

1	CANNABIS	documents and evidence protected	merit and are too general
2	ACTIVITY	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
2	at, to, or from the	work product doctrine; (3) it may	subd. (a)(2));
3	PREMISES, on 527	seek documents and evidence protected from disclosure by the	3. All objections are made without connecting the
3	separate days, in the	attorney-client privilege; (4) it may	questions to any specific
4	period from April 23,	seek documents and evidence	ground for the objection.
	2018 to October 2,	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
5	2019.	privileges or doctrines that are not	subd. (b).)
		readily apparent given the broad	
6	DECYLEGE FOR	scope of the request.	Davis Care Franklass Davis and
7	REQUEST FOR	Response Responding Party objects to this	Basis for Further Response  1. The answer to the request
,	Admission No. 28:	request on the following grounds:	is evasive and incomplete
8	Admit that the GROSS	(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
	REVENUE YOU	burdensome, and lacks reasonable	subd. (a)(1)),
9	received from	particularity; (2) it may seek	2. The objections are without
10	COMMERCIAL	documents and evidence protected	merit and are too general
10	DISTRIBUTOR CANNABIS	from disclosure by the attorney work product doctrine; (3) it may	(Code Civ. Proc., § 2033.290, subd. (a)(2));
11		seek documents and evidence	3. All objections are made
	ACTIVITY at, to, or from the PREMISES in	protected from disclosure by the	without connecting the
12		attorney-client privilege; (4) it may	questions to any specific
1.0	the period from April	seek documents and evidence	ground for the objection.
13	23, 2018 to April 22, 2019 was more than	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
14	\$1,000,000.	privileges or doctrines that are not readily apparent given the broad	subd. (b).)
- 1	\$1,000,000.	scope of the request.	
		<del>                                     </del>	
15	REQUEST FOR	Response	Basis for Further Response
	REQUEST FOR ADMISSION NO. 29:	Responding Party objects to this	Basis for Further Response  1. The answer to the request
15 16	REQUEST FOR ADMISSION NO. 29: Admit that the GROSS	Responding Party objects to this request on the following grounds:	1. The answer to the request is evasive and incomplete
16	<b>ADMISSION NO. 29:</b>	Responding Party objects to this request on the following grounds:  (1) it is overbroad, unduly	1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290,
	ADMISSION NO. 29: Admit that the GROSS	Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable	1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)),
16	ADMISSION NO. 29: Admit that the GROSS REVENUE YOU	Responding Party objects to this request on the following grounds:  (1) it is overbroad, unduly	1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290,
16 17 18	ADMISSION NO. 29: Admit that the GROSS REVENUE YOU received from	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	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,
16 17	ADMISSION NO. 29: Admit that the GROSS REVENUE YOU received from COMMERCIAL	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	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));
16 17 18 19	ADMISSION NO. 29: Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or	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	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
16 17 18	ADMISSION NO. 29: Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS	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	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
16 17 18 19	ADMISSION NO. 29: Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April	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	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
16 17 18 19 20 21	ADMISSION NO. 29: 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	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	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
16 17 18 19 20	ADMISSION NO. 29: 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	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	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.
16 17 18 19 20 21 22	ADMISSION NO. 29: 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	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	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,
16 17 18 19 20 21	ADMISSION NO. 29: 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.	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).)
16 17 18 19 20 21 22 23	ADMISSION NO. 29: 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.  REQUEST FOR	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.  Response	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).)  Basis for Further Response
16 17 18 19 20 21 22	ADMISSION NO. 29: 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.  REQUEST FOR ADMISSION NO. 30:	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.  Response Responding Party objects to this	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).)  Basis for Further Response  1. The answer to the request
16 17 18 19 20 21 22 23	ADMISSION NO. 29: 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.  REQUEST FOR ADMISSION NO. 30: Admit that the GROSS	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.  Response Responding Party objects to this request on the following grounds:	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).)  Basis for Further Response 1. The answer to the request is evasive and incomplete
16 17 18 19 20 21 22 23 24 25	ADMISSION NO. 29: 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.  REQUEST FOR ADMISSION NO. 30: Admit that the GROSS REVENUE YOU	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.  Response Responding Party objects to this	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).)  Basis for Further Response 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)),
16 17 18 19 20 21 22 23 24	ADMISSION NO. 29: 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.  REQUEST FOR ADMISSION NO. 30: Admit that the GROSS REVENUE YOU received from	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.  Response 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 (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).)  Basis for Further Response 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)), 2. The objections are without
16 17 18 19 20 21 22 23 24 25 26	ADMISSION NO. 29: 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.  REQUEST FOR ADMISSION NO. 30: Admit that the GROSS REVENUE YOU received from COMMERCIAL	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.  Response 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	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).)  Basis for Further Response 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
16 17 18 19 20 21 22 23 24 25	ADMISSION NO. 29: 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.  REQUEST FOR ADMISSION NO. 30: Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR	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.  Response 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	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).)  Basis for Further Response 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,
16 17 18 19 20 21 22 23 24 25 26	ADMISSION NO. 29: 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.  REQUEST FOR ADMISSION NO. 30: Admit that the GROSS REVENUE YOU received from COMMERCIAL	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.  Response 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	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).)  Basis for Further Response 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	ACTIVITY at, to, or	seek documents and evidence	3. All objections are made
2	from the PREMISES in	protected from disclosure by the	without connecting the
2	the period from April	attorney-client privilege; (4) it may	questions to any specific
3	23, 2018 to April	seek documents and evidence	ground for the objection.
3	22, 2019 was more than	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
4	\$5,000,000.	privileges or doctrines that are not readily apparent given the broad	subd. (b).)
-	ψ2,000,000.	scope of the request.	
5	REQUEST FOR	Response	Basis for Further Response
	ADMISSION NO. 31:	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
		(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
7	REVENUE YOU	burdensome, and lacks reasonable	subd. (a)(1)),
0	received from	particularity; (2) it may seek	2. The objections are without
8	COMMERCIAL	documents and evidence protected	merit and are too general
0	DISTRIBUTOR	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
9	CANNABIS	work product doctrine; (3) it may	subd. (a)(2));
10	ACTIVITY at, to, or	seek documents and evidence protected from disclosure by the	3. All objections are made without connecting the
10	from the PREMISES in	attorney-client privilege; (4) it may	questions to any specific
11	the period from April	seek documents and evidence	ground for the objection.
	23, 2018 to April	protected from disclosure by other	(Code Civ. Proc., § 2033.230,
12	22, 2019 was more than	privileges or doctrines that are not	subd. (b).)
1.0	\$10,000,000.	readily apparent given the broad	
13		scope of the request.	
14	REQUEST FOR	Response	Basis for Further Response
17	ADMISSION NO. 32:	Responding Party objects to this request on the following grounds:	1. The answer to the request is evasive and incomplete
15	Admit that the GROSS	(1) it is overbroad, unduly	(Code Civ. Proc. § 2033.290,
ll.			
	REVENUE YOU		
16	received from	burdensome, and lacks reasonable particularity; (2) it may seek	subd. (a)(1)), 2. The objections are without
	received from COMMERCIAL	burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected	subd. (a)(1)), 2. The objections are without merit and are too general
16 17	received from COMMERCIAL DISTRIBUTOR	burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney	subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290,
17	received from COMMERCIAL DISTRIBUTOR CANNABIS	burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence protected from disclosure by the attorney work product doctrine; (3) it may	subd. (a)(1)), 2. The objections are without merit and are too general (Code Civ. Proc., § 2033.290, subd. (a)(2));
	received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or	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	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
17 18	received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in	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	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
17	received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or	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	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
17 18	received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in	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	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.
17 18 19 20	received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April	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	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
17 18 19	received from COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April	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	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,
17 18 19 20 21	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.	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.	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).)
17 18 19 20	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.  REQUEST FOR	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.  Response	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).)  Basis for Further Response
17 18 19 20 21 22	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.	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.  Response Responding Party objects to this	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).)  Basis for Further Response  1. The answer to the request
17 18 19 20 21	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.  REQUEST FOR	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.  Response Responding Party objects to this request on the following grounds:	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).)  Basis for Further Response 1. The answer to the request is evasive and incomplete
17 18 19 20 21 22 23	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.  REQUEST FOR ADMISSION NO. 33:	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.  Response Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly	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).)  Basis for Further Response 1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290,
17 18 19 20 21 22	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.  REQUEST FOR ADMISSION NO. 33: Admit that the GROSS	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.  Response Response Responding Party objects to this request on the following grounds: (1) it is overbroad, unduly burdensome, and lacks reasonable	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).)  Basis for Further Response  1. The answer to the request is evasive and incomplete (Code Civ. Proc. § 2033.290, subd. (a)(1)),
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17 18 19 20 21 22 23 24 25	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.  REQUEST FOR ADMISSION NO. 33: Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR	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.  Response 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	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).)  Basis for Further Response 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
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1	2018 to April 22, 2019	seek documents and evidence	ground for the objection.
2	was more than	protected from disclosure by other privileges or doctrines that are not	(Code Civ. Proc., § 2033.230, subd. (b).)
2	\$30,000,000.	readily apparent given the broad	
3	REQUEST FOR	scope of the request.  Response	Basis for Further Response
4	<b>ADMISSION NO. 34:</b>	Responding Party objects to this request on the following grounds:	1. The answer to the request is evasive and incomplete
5	Admit that the GROSS REVENUE YOU	(1) it is overbroad, unduly burdensome, and lacks reasonable	(Code Civ. Proc. § 2033.290, subd. (a)(1)),
6	received from COMMERCIAL	particularity; (2) it may seek documents and evidence protected	2. The objections are without merit and are too general
7	DISTRIBUTOR	from disclosure by the attorney	(Code Civ. Proc., § 2033.290,
8	CANNABIS ACTIVITY at the	work product doctrine; (3) it may seek documents and evidence	subd. (a)(2)); 3. All objections are made
9	PREMISES in the period from April 23,	protected from disclosure by the attorney-client privilege; (4) it may seek documents and evidence	without connecting the questions to any specific ground for the objection.
10	2018 to April 22, 2019 was more than	protected from disclosure by other privileges or doctrines that are not	(Code Civ. Proc., § 2033.230, subd. (b).)
11	\$50,000,000.	readily apparent given the broad scope of the request.	
12	REQUEST FOR	Response	Basis for Further Response
13	ADMISSION NO. 35: Admit that the GROSS	Responding Party objects to this request on the following grounds:	1. The answer to the request is evasive and incomplete
14	REVENUE YOU	(1) it is overbroad, unduly burdensome, and lacks reasonable	(Code Civ. Proc. § 2033.290, subd. (a)(1)),
15	received from COMMERCIAL	particularity; (2) it may seek documents and evidence protected	2. The objections are without merit and are too general
16	DISTRIBUTOR CANNABIS	from disclosure by the attorney work product doctrine; (3) it may	(Code Civ. Proc., § 2033.290, subd. (a)(2));
17	ACTIVITY at the PREMISES in the	seek documents and evidence protected from disclosure by the	3. All objections are made without connecting the
18	period from April 23,	attorney-client privilege; (4) it may seek documents and evidence	questions to any specific ground for the objection.
19	2018 to April 22, 2019 was more than	protected from disclosure by other privileges or doctrines that are not	(Code Civ. Proc., § 2033.230, subd. (b).)
20	\$70,000,000.	readily apparent given the broad scope of the request.	
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22	///		
23	///		
24	///		
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27	///		
28	///	23	

1	Dated: February 2, 2022	Respectfully Submitted,
2 3		ROB BONTA Attorney General of California HARINDER KAPUR
4		Senior Assistant Attorney General
5		
6		
7		ETHAN A. TURNER MICHAEL J. YUN Deputy Attorney Generals
8 9		Deputy Attorney Generals Attorneys for Plaintiff California 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.	Margarita Salazar, Esq.
Attorney for Defendants Ruben Kachian, Vertical	Law Offices of Margarita Salazar
Bliss, Inc., Kushy Punch, Inc., Conglomerate	470 Third Avenue, Ste. 9
Marketing, LLC., More Agency, Inc., Arutyun	Chula Vista, CA 91910-4663
Barsamyan, and Mike A. Toroyan	E-mail Address:
	margarita@msalazarlaw.com
Ian Stewart	E-mail Address:
Wilson Elser Moskowitz Edelman & Dicker LLP	ian.stewart@wilsonelser.com
Attorney for Defendant Kevin Halloran	

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.

1 Auti-

A. Flores	
Declarant	Signature

SA2020800072 POS Barsamyan.docx