

1 ROB BONTA  
Attorney General of California  
2 HARINDER KAPUR  
Senior Assistant Attorney General  
3 JOSHUA B. EISENBERG  
Supervising Deputy Attorney General  
4 MICHAEL J. YUN (SBN 292587)  
ETHAN A. TURNER (SBN 294891)  
5 Deputy Attorneys General  
600 West Broadway, Suite 1800  
6 San Diego, CA 92101  
Telephone: (619) 321-5793  
7 Facsimile: (619) 645-2061  
E-mail: Michael.Yun@doj.ca.gov  
8 *Attorneys for Plaintiff*  
*Department of Cannabis Control*  
9

EXEMPT FROM FILING FEES  
GOV. CODE, § 6103

10 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
11 **COUNTY OF LOS ANGELES**  
12 **NORTH VALLEY DISTRICT – CHATSWORTH COURTHOUSE**  
13

14  
15 **DEPARTMENT OF CANNABIS**  
16 **CONTROL,**

17 Plaintiff,

18 v.

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

27 Defendants.  
28

Case No. 20CHCV00560

**DECLARATION OF DEPUTY  
ATTORNEY GENERAL MICHAEL YUN  
IN SUPPORT OF MOTION FOR  
SANCTIONS AGAINST DEFENDANT  
RUBEN KACHIAN a.k.a. RUBEN CROSS  
AND HIS ATTORNEY OF RECORD FOR  
VIOLATING COURT'S DISCOVERY  
ORDER**

Date: May 3, 2022  
Time: 08:30 A.M.  
Dept: F49  
Judge: The Honorable Stephen P.  
Pfahler

Trial Date: January 30, 2023  
Action Filed: September 23, 2020

**RESERVATION NO. 386860799955**

///

///

1 I, Michael Yun, declare as follows:

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

8 2. On January 10, 2022, at or around 8:30 a.m., I made a virtual appearance before this  
9 Court as attorney for Plaintiff when Plaintiff’s Motion to Compel Responses to Interrogatories,  
10 Set One, as to Defendant Ruben Kachian, a.k.a. “Ruben Cross” and Requests for Admission, Set  
11 One, came on regularly for hearing in Department F49 of the Superior Court of California,  
12 County of Los Angeles, North Valley District – Chatsworth Courthouse.

13 3. On January 10, 2022, the Court announced its tentative ruling granting Plaintiff’s  
14 Motion to Compel against Defendant Ruben Kachian.

15 4. Neither Defendant nor his attorney of record, Margarita Salazar, appeared at the  
16 hearing.

17 5. The tentative ruling was adopted with a minor technical correction as the Court’s  
18 final ruling and Order.

19 6. Per instruction of the Court, I had caused to be served the Court’s Order to Defendant  
20 Ruben Kachian, a.k.a. Ruben Cross (Defendant), through his attorney of record, Margarita  
21 Salazar. Specifically, a document entitled “Notice of Court’s Order Granting Plaintiff’s Motion  
22 to Compel Responses, Deeming Requests for Admission Admitted, and Imposing Monetary  
23 Sanction” (hereinafter, “Notice of Court’s Order”), consisting of six pages of materials including  
24 the Notice section, a true and correct copy of the Court’s Order attached as “Exhibit 1”, and proof  
25 of service, entitled “Declaration of Service by E-mail and U.S. Mail”, was served by mail to the  
26 Law Offices of Margarita Salazar. In addition, a PDF electronic courtesy copy was emailed to  
27 Ms. Salazar at her official work email address: margarita@msalazarlaw.com. A true and correct  
28 copy of the Notice of Court’s Order is attached hereto as Exhibit 1.

1           7.     On January 12, 2022, and January 19, 2022, DAG Ethan Turner emailed Ms. Salazar  
2 to remind her that the Court ordered Defendant to serve his responses to Plaintiff by January 20,  
3 2022. I was a copied recipient of these emails. True and correct copies of the emails are attached  
4 hereto as Exhibits 2 and 3, respectively.

5           8.     On January 20, 2022, Ms. Salazar acknowledged the email, dated January 19, 2022,  
6 referenced in Paragraph 7, above, requested a two-day extension, and promised that “[she] will  
7 get the discovery out by tomorrow[,] [January 21, 2022].” I was a copied recipient of this email.  
8 A true and correct copy of the email is attached hereto as Exhibit 4.

9           9.     Later on January 20, 2022, DAG Ethan Turner emailed Ms. Salazar to remind her that  
10 we remain willing to accept service electronically. I was a copied recipient of this email. A true  
11 and correct copy of the email is attached hereto as Exhibit 5.

12          10.    On January 25, 2022, DAG Ethan Turner emailed Ms. Salazar requesting that she  
13 provide an update regarding her efforts to comply with the Court’s order. On January 26, 2022,  
14 DAG Turner emailed Ms. Salazar to inform her again that no discovery responses had been  
15 received from her or Defendant despite the Court’s Order. I was a copied recipient of these  
16 emails. True and correct copies of the emails are attached hereto as Exhibits 6 and 7,  
17 respectively.

18          11.    Plaintiff has not received any discovery responses from Defendant despite the Court’s  
19 order imposing a deadline of January 20, 2022. Specifically, Defendant has not provided  
20 “verified responses to form interrogatories” to Plaintiff. To date, it has been more than 85 days  
21 since this Court’s Order was issued and the Notice of Court’s Order was served on Ms. Salazar.

22          12.    Plaintiff also has not received the Court imposed monetary sanction of \$250 from  
23 Defendant or Ms. Salazar.

24          13.    Ms. Salazar has not provided any justification for disobeying the Court’s discovery  
25 order. Additionally, she has not provided any justification for Defendant’s failure or delay in  
26 providing the discovery responses or any justification for Defendant’s failure or delay in paying  
27 the Court imposed monetary sanction.

28    ///

1 Cost Declaration

2 14. Plaintiff has requested that the Court award \$9,185.00 in monetary sanction as to  
3 Defendant and Ms. Salazar. The request is based on the number of hours worked by myself, co-  
4 counsel, and two supervisors as a direct consequence of Defendant willfully disobeying the  
5 Court's discovery order, issued on January 10, 2022.

6 15. Four California Attorney General's Office's staff members have participated in the  
7 attempt to resolve this discovery matter and to hold Defendant and Ms. Salazar accountable for  
8 willfully disobeying this Court's order: Senior Assistant Attorney General Harinder Kapur,  
9 Supervising Deputy Attorney General Joshua Eisenberg, Deputy Attorney General Ethan Turner,  
10 and myself.

- 11 a. Senior Assistant Attorney General Harinder Kapur's hourly billing rate is \$220.  
12 Ms. Kapur undertook 1.0 hour of work as a consequence of Defendant Ruben  
13 Kachian and Ms. Salazar willfully disobeying this Court's order. The cost of  
14 Ms. Kapur's work to the client amounted to \$220.00.
- 15 b. Supervising Deputy Attorney General Joshua Eisenberg's hourly billing rate is  
16 \$220. Mr. Eisenberg undertook 3.75 hours of work as a consequence of  
17 Defendant Ruben Kachian and Ms. Salazar willfully disobeying this Court's  
18 order. and her total billing for such work amounts to \$825.00.
- 19 c. Deputy Attorney General Ethan Turner's hourly billing rate is \$220. Mr. Turner  
20 undertook 3.75 hours of work as a consequence of Defendant Ruben Kachian  
21 and Ms. Salazar willfully disobeying this Court's order. The cost of Mr.  
22 Turner's work to the clients amounted to \$825.00.
- 23 d. I spent 30.25 hours preparing the Motion for Sanctions and other accompanying  
24 documents in support of the motion. My hourly billing rate is \$220, so the total  
25 costs incurred for the work which I have had to undertake to date as a  
26 consequence of Defendant Ruben Kachian and Ms. Salazar willfully disobeying  
27 this Court's order is \$6,655.00.

28 ///



- 1 e. Collectively, as of the date of this filing, \$8,525.00 in legal service fees were  
2 incurred in addressing and preparing the motion in response to Defendant and  
3 Ms. Salazar's willful disobedience of this Court's order.
- 4 f. Additionally, Mr. Turner intends to appear remotely at the hearing reserved for  
5 May 6, 2022, and anticipate spending an additional three hours of billable hours  
6 to review any opposition, to prepare for the hearing, and appear at the hearing  
7 itself. This estimated additional time will probably be less than that which will  
8 actually be incurred and if this turns out to be a significant underestimation, a  
9 supplemental declaration with documentation will be filed ahead of the hearing.  
10 This anticipated time will also be charged at \$220 per hour and will total  
11 \$660.00.

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

22 17. Therefore, the total attorney hours reflected in the "Transaction Detail for Matter(s):  
23 SA2020800072" Reports for which compensation is sought are 38.75 hours, plus the anticipated  
24 time discussed below. "SA2020800072" is the Office of the Attorney General's internal matter  
25 identification number for the current case.

26 ///

27 ///

1           18. Based on the above, the total costs that will be incurred by Plaintiff as a consequence  
2 of Defendant Ruben Kachian and Ms. Salazar willfully disobeying this Court's order amount to  
3 \$9,185.00.

4  
5           This declaration is executed under penalty of perjury under the laws of the State of  
6 California this 7th day of April, 2022, at Los Angeles, California.

7  
8   
9 \_\_\_\_\_  
MICHAEL J. YUN

# **Exhibit 1**

1 ROB BONTA  
Attorney General of California  
2 HARINDER KAPUR  
Senior Assistant Attorney General  
3 ETHAN A. TURNER  
Deputy Attorney General  
4 State Bar No. 294891  
5 MICHAEL J. YUN  
Deputy Attorney General  
6 State Bar No. 292587  
7 1300 I Street, Suite 125  
P.O. Box 944255  
8 Sacramento, CA 94244-2550  
Telephone: (916) 210-7898  
9 E-mail: Ethan.Turner@doj.ca.gov  
Michael.Yun@doj.ca.gov  
10 *Attorneys for Plaintiffs*  
11 *California Department of Public Health and*  
*Bureau of Cannabis Control*

13 SUPERIOR COURT OF THE STATE OF CALIFORNIA

14 COUNTY OF LOS ANGELES

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

19 Plaintiffs,

20 v.

21 **VERTICAL BLISS, INC., KUSHY**  
22 **PUNCH, INC., CONGLOMERATE**  
23 **MARKETING, LLC, MORE AGENCY,**  
24 **INC., RUBEN KACHIAN aka RUBEN**  
**CROSS, ARUTYUN BARSAMYAN,**  
25 **KEVIN HALLORAN, MIKE A.**  
**TOROYAN, and DOES 1 through 3,**  
**inclusive,**

26 Defendants.

Case No. 20CHCV00560

**NOTICE OF COURT'S ORDER  
GRANTING PLAINTIFF'S MOTION TO  
COMPEL RESPONSES, DEEMING  
REQUESTS FOR ADMISSIONS  
ADMITTED, AND IMPOSING  
MONETARY SANCTION**

Date: January 10, 2022  
Time: 10:30 a.m.  
Dept: F49  
Judge: The Honorable Stephen P.  
Pfahler

Trial Date:  
Action Filed: September 15, 2021

1 **NOTICE OF COURT'S ORDER**

2 **TO RUBEN KACHIAN, AKA "RUBEN CROSS", AND HIS ATTORNEY OF**  
3 **RECORD, MARGARITA SALAZAR:**

4 **PLEASE TAKE NOTICE** that the Plaintiff's Motion to Compel Responses to  
5 Interrogatories, Set One, as to Defendant Ruben Kachian, a.k.a "Ruben Cross", and Requests for  
6 Admission, Set One, came on regularly for hearing on January 10, 2022, at 8:30 a.m., in  
7 Department F49 of the Superior Court of California, County of Los Angeles, North Valley  
8 District – Chatsworth Courthouse. The Court, on January 10, 2022, announced its Tentative  
9 Ruling to Grant the Plaintiff's Motion to Compel Responses. Neither Defendant nor his attorney  
10 of record appeared at the hearing and the Tentative Ruling was adopted as the Court's final ruling  
11 and Order.

12 Per instruction of the Court, counsel for Plaintiffs, as the moving party, hereby give notice  
13 of the Court's order to Defendant Ruben Kachian, a.k.a "Ruben Cross", through his attorney of  
14 record, Margarita Salazar. Attached hereto as "Exhibit 1" is a true and correct copy of the  
15 Court's Minute Order, dated January 10, 2022, adopting its Tentative Ruling, which is now the  
16 final ruling in this matter.

17 Dated: January 10, 2022

Respectfully submitted,

18 ROB BONTA  
19 Attorney General of California  
20 HARINDER KAPUR  
Senior Assistant Attorney General

21 

22 MICHAEL J. YUN  
23 Ethan Turner  
24 Deputy Attorneys General  
Attorneys for Plaintiffs

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# Exhibit 1

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Civil Division**

North Valley District, Chatsworth Courthouse, Department F49

**20CHCV00560**

**CALIFORNIA DEPARTMENT OF PUBLIC HEALTH, et al.**

**vs VERTICAL BLISS, INC., et al.**

January 10, 2022

8:30 AM

Judge: Honorable Stephen P. Pfahler

Judicial Assistant: Alina Joo

Courtroom Assistant: None

CSR: Electronic Recording Monitor (ERM)

ERM: None

Deputy Sheriff: None

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**APPEARANCES:**

For Plaintiff(s): ETHAN A. TURNER (Telephonic) by Michael Yun

For Defendant(s): No Appearances

Other Appearance Notes:

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**NATURE OF PROCEEDINGS:** Hearing on Motion to Compel Further Discovery Responses

The matter is called for hearing.

The Court read its Tentative Ruling on the record.

Counsel submit and the Court adopts its ruling as follows:

Plaintiff California Department of Public Health and Bureau of Cannabis Control moves to compel responses to Form Interrogatories (set one) from Defendant Ruben Kachian aka Ruben Cross. Plaintiff served Defendant on June 14, 2021. [Declaration of Ethan Turner, ¶ 2, Exhibit 1.]

Plaintiff also served Request for Admissions served on June 14, 2021. [Declaration of Ethan Turner, ¶ 2, Exhibit 2.] Plaintiff moves to compel responses to request for admissions, no such relief is available, and the court instead considers the motion as one to deem the requests for admissions admitted.

The subject items remain outstanding as of the date of the filing motion, even after an extension. The unopposed motions are granted. Defendant is ordered to serve verified responses to form interrogatories without objections within ten days. (Code Civ. Proc., §§ 2030.290, subd. (a-b).) The request for admissions is deemed admitted. (Code Civ. Proc., § 2033.280, subd. (a-b).)

Sanctions in the amount of \$250 joint and severally imposed against both counsel and defendant Ruben Kachian aka Ruben Cross, and payable within 30 days of this order. (Code Civ. Proc., § 2030.290(c) and 2033.280, subd. (c).)

Trial date of June 13, 2022 remains set.

**SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES**

**Civil Division**

North Valley District, Chatsworth Courthouse, Department F49

**20CHCV00560**

**CALIFORNIA DEPARTMENT OF PUBLIC HEALTH, et al.  
vs VERTICAL BLISS, INC., et al.**

January 10, 2022

8:30 AM

Judge: Honorable Stephen P. Pfahler  
Judicial Assistant: Alina Joo  
Courtroom Assistant: None

CSR: Electronic Recording Monitor (ERM)  
ERM: None  
Deputy Sheriff: None

---

Moving counsel to give notice to all parties.



**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.**

Los Angeles  
Superior Court

Case 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 January 10, 2022, I served the attached **NOTICE OF COURT'S ORDER GRANTING PLAINTIFF'S MOTION TO COMPEL RESPONSES, DEEMING REQUESTS FOR ADMISSIONS ADMITTED, AND IMPOSING MONETARY SANCTION AND EXHIBIT 1** 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:

Ian Stewart, Esq.  
Wilson Elser Moskowitz Edelman & Dicker LLP - Los Angeles  
555 South Flower Street Suite 2900  
Los Angeles, CA 90071  
**E-mail Address:** [ian.stewart@wilsonelser.com](mailto:ian.stewart@wilsonelser.com)  
***Attorney for Co-Defendant***

Margarita Salazar, Esq.  
Law Offices of Margarita Salazar  
470 Third Avenue, Ste. 9  
Chula Vista, CA 91910-4663  
**E-mail Address:** [margarita@msalazarlaw.com](mailto:margarita@msalazarlaw.com)  
***Attorney for Defendant***

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 January 10, 2022, at San Diego, California.

\_\_\_\_\_  
M. Gieselman  
Declarant

\_\_\_\_\_  
*M. Gieselman*  
Signature

## **Exhibit 2**

**From:** [Ethan Turner](#)  
**To:** [Margarita Salazar, Esq.](#); [Kevin Knox](#)  
**Cc:** [Michael Yun](#); [Harinder Kapur](#)  
**Subject:** RE: Meet and Confer Conversation  
**Date:** Wednesday, January 12, 2022 12:35:32 PM  
**Attachments:** [Stipulation and Proposed Order for Substitution of Plaintiff.pdf](#)  
[Notice of Court Order Granting Motion to Compel \(Signed\).pdf](#)

---

Margarita,

I'm following up on my emails from this morning regarding the mediation, the proposed stipulation that I sent on January 7<sup>th</sup>, regarding the consolidation of the Plaintiff agencies, the discovery matters we discussed on January 5<sup>th</sup>, and the order that was issued by the Court on Monday (which was served to you on the same day, but is attached for reference).

### **Mediation**

As noted in my email this morning to case manager for retired judge, Gail Andler, on which you were copied we've now all agreed to the mediator, the date, and to the fee splitting proposal made by Ian Stewart. As indicated by Mr. Levington, in his email, our mediation briefs are due on February 21<sup>st</sup>. We are hopeful that we will have a fruitful mediation session.

### **Stipulation**

Mr. Stewart indicated that he would agree to the stipulation I sent on the 7<sup>th</sup>. Let me know if you have had a chance to review it. I have attached it to this email for your easy reference.

### **Discovery**

After our discussion on January 5, you indicated that you would get back to us after your discussion with your clients about further discovery responses. We not heard back from you - Do you have any update? Based on our conversation you will be providing code compliant responses by January 21, 2022.

Please note that the Court ordered Mr. Kachian's responses to be served on the 1/21, also. We look forward to hearing from you.

Thanks,

***Ethan Turner***

**Deputy Attorney General III**  
**California Department of Justice**  
**Office of the Attorney General**  
**Division of Civil Law**  
**Cannabis Control Section**  
1300 I Street  
1620-18  
Sacramento, CA 95814

Office: (916) 210-7898



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---

**From:** Ethan Turner

**Sent:** Wednesday, January 5, 2022 1:04 PM

**To:** 'Margarita Salazar, Esq.' <[Margarita@msalazarlaw.com](mailto:Margarita@msalazarlaw.com)>

**Cc:** Harinder Kapur <[Harinder.Kapur@Doj.Ca.Gov](mailto:Harinder.Kapur@Doj.Ca.Gov)>; Michael Yun <[Michael.Yun@doj.ca.gov](mailto:Michael.Yun@doj.ca.gov)>

**Subject:** Meet and Confer Conversation

Margarita,

To confirm what we discussed earlier, you indicated that you will be meeting with your clients this afternoon in order to work on supplemental answers to discovery. You further indicated that you will call or email us tomorrow to confirm timeframes for getting the supplemental responses to us, and that you could get us the supplemental responses by January 21. We stated that we have been trying to get responses to discovery for 6 months now, and we would like to see your additional discovery requests by noon on Friday 1/21.

We also discussed issue of mediation and I told you I would send you the initial settlement letter that was authorized by our clients. It is attached to this email.

Please feel free to send a counter offer with justification, including supporting documentation, for the offer.

Thanks,

***Ethan Turner***

**Deputy Attorney General III**

**California Department of Justice**

**Office of the Attorney General**  
**Division of Civil Law**  
**Cannabis Control Section**  
1300 I Street  
1620-18  
Sacramento, CA 95814  
Office: (916) 210-7898



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# **Exhibit 3**

**From:** [Ethan Turner](#)  
**To:** [Margarita Salazar, Esq.](#); [Kevin Knox](#)  
**Cc:** [Michael Yun](#); [Harinder Kapur](#)  
**Subject:** RE: Meet and Confer Conversation  
**Date:** Wednesday, January 19, 2022 8:51:13 AM

---

Margarita,

We have not heard back from you regarding any of the below topics.

Have you been able to discuss these matters with your clients?

Thanks,

-Ethan

***Ethan Turner***

**Deputy Attorney General III**  
**California Department of Justice**  
**Office of the Attorney General**  
**Division of Civil Law**  
**Cannabis Control Section**  
1300 I Street  
1620-18  
[Sacramento, CA 95814](#)  
Office: (916) 210-7898



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---

**From:** Ethan Turner

**Sent:** Wednesday, January 12, 2022 9:09 PM

**To:** 'Margarita Salazar, Esq.' <Margarita@msalazarlaw.com>; 'Kevin Knox' <kevin@msalazarlaw.com>

**Cc:** Michael Yun <Michael.Yun@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>

**Subject:** RE: Meet and Confer Conversation

Margarita,

In my below email, I *mistakenly* stated that the Court ordered Mr. Kachian to provide responses to his discovery January 21<sup>st</sup>.

The order actually requires that the responses be provided “within 10 days” of the order. The order was issued and served on you on January 10th, so the correct deadline imposed by the Court is January 20th.

Sorry about that.

Thanks again,

Ethan

***Ethan Turner***

**Deputy Attorney General III**

**California Department of Justice**

**Office of the Attorney General**

**Division of Civil Law**

**Cannabis Control Section**

1300 I Street

1620-18

Sacramento, CA 95814

Office: (916) 210-7898



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laws including the Electronic Communications Privacy Act. If you are not the intended recipient, please contact the sender and destroy all copies of the communication.

---

**From:** Ethan Turner

**Sent:** Wednesday, January 12, 2022 12:35 PM

**To:** Margarita Salazar, Esq. <[Margarita@msalazarlaw.com](mailto:Margarita@msalazarlaw.com)>; Kevin Knox <[kevin@msalazarlaw.com](mailto:kevin@msalazarlaw.com)>

**Cc:** Michael Yun <[Michael.Yun@doj.ca.gov](mailto:Michael.Yun@doj.ca.gov)>; Harinder Kapur <[Harinder.Kapur@Doj.Ca.Gov](mailto:Harinder.Kapur@Doj.Ca.Gov)>

**Subject:** RE: Meet and Confer Conversation

Margarita,

I'm following up on my emails from this morning regarding the mediation, the proposed stipulation that I sent on January 7<sup>th</sup>, regarding the consolidation of the Plaintiff agencies, the discovery matters we discussed on January 5<sup>th</sup>, and the order that was issued by the Court on Monday (which was served to you on the same day, but is attached for reference).

**Mediation**

As noted in my email this morning to case manager for retired judge, Gail Andler, on which you were copied we've now all agreed to the mediator, the date, and to the fee splitting proposal made by Ian Stewart. As indicated by Mr. Levington, in his email, our mediation briefs are due on February 21<sup>st</sup>.

We are hopeful that we will have a fruitful mediation session.

**Stipulation**

Mr. Stewart indicated that he would agree to the stipulation I sent on the 7<sup>th</sup>. Let me know if you have had a chance to review it. I have attached it to this email for your easy reference.

**Discovery**

After our discussion on January 5, you indicated that you would get back to us after your discussion with your clients about further discovery responses. We not heard back from you - Do you have any update? Based on our conversation you will be providing code compliant responses by January 21, 2022.

Please note that the Court ordered Mr. Kachian's responses to be served on the 1/21, also.

We look forward to hearing from you.

Thanks,

***Ethan Turner***

**Deputy Attorney General III  
California Department of Justice  
Office of the Attorney General  
Division of Civil Law**

## Cannabis Control Section

1300 I Street

1620-18

Sacramento, CA 95814

Office: (916) 210-7898



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---

**From:** Ethan Turner

**Sent:** Wednesday, January 5, 2022 1:04 PM

**To:** 'Margarita Salazar, Esq.' <[Margarita@msalazarlaw.com](mailto:Margarita@msalazarlaw.com)>

**Cc:** Harinder Kapur <[Harinder.Kapur@Doj.Ca.Gov](mailto:Harinder.Kapur@Doj.Ca.Gov)>; Michael Yun <[Michael.Yun@doj.ca.gov](mailto:Michael.Yun@doj.ca.gov)>

**Subject:** Meet and Confer Conversation

Margarita,

To confirm what we discussed earlier, you indicated that you will be meeting with your clients this afternoon in order to work on supplemental answers to discovery. You further indicated that you will call or email us tomorrow to confirm timeframes for getting the supplemental responses to us, and that you could get us the supplemental responses by January 21. We stated that we have been trying to get responses to discovery for 6 months now, and we would like to see your additional discovery requests by noon on Friday 1/21.

We also discussed issue of mediation and I told you I would send you the initial settlement letter that was authorized by our clients. It is attached to this email.

Please feel free to send a counter offer with justification, including supporting documentation, for the offer.

Thanks,

*Ethan Turner*

**Deputy Attorney General III  
California Department of Justice  
Office of the Attorney General  
Division of Civil Law  
Cannabis Control Section**

1300 I Street

1620-18

Sacramento, CA 95814

Office: (916) 210-7898



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## **Exhibit 4**

**From:** [Margarita Salazar, Esq.](#)  
**To:** [Ethan Turner](#)  
**Cc:** [Kevin Knox](#); [Harinder Kapur](#); [Michael Yun](#)  
**Subject:** Re: FW: Meet and Confer Conversation  
**Date:** Thursday, January 20, 2022 9:15:08 AM

---

**EXTERNAL EMAIL:** This message was sent from outside DOJ. Please do not click links or open attachments that appear suspicious.

Ethan,

I am sorry I have been out. A client came in with Covid and wreaked havoc.

I am back today. I am going to need a 2 day extension. We will get the discovery out by tomorrow. Do you agree?

Thanks.

--m

On Wed, Jan 19, 2022 at 9:03 AM Ethan Turner <[Ethan.Turner@doj.ca.gov](mailto:Ethan.Turner@doj.ca.gov)> wrote:

Mr. Knox,

I received an out of office reply from Ms. Salazar after sending the below email. Can you provide any update on the status of the matters discussed in this thread, namely the production of additional code compliant discovery requests for her clients and compliance with the court order to provide Kachian's discovery requests by tomorrow?

Thanks,

***Ethan Turner***

**Deputy Attorney General III**

**California Department of Justice**

**Office of the Attorney General**

**Division of Civil Law**

**Cannabis Control Section**

**1300 I Street**

1620-18

Sacramento, CA 95814

Office: (916) 210-7898



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---

**From:** Ethan Turner  
**Sent:** Wednesday, January 19, 2022 8:51 AM  
**To:** 'Margarita Salazar, Esq.' <[Margarita@msalazarlaw.com](mailto:Margarita@msalazarlaw.com)>; 'Kevin Knox' <[kevin@msalazarlaw.com](mailto:kevin@msalazarlaw.com)>  
**Cc:** Michael Yun <[Michael.Yun@doj.ca.gov](mailto:Michael.Yun@doj.ca.gov)>; Harinder Kapur <[Harinder.Kapur@Doj.Ca.Gov](mailto:Harinder.Kapur@Doj.Ca.Gov)>  
**Subject:** RE: Meet and Confer Conversation

Margarita,

We have not heard back from you regarding any of the below topics.

Have you been able to discuss these matters with your clients?

Thanks,

-Ethan

*Ethan Turner*

**Deputy Attorney General III**

**California Department of Justice**

**Office of the Attorney General**

**Division of Civil Law**

**Cannabis Control Section**

1300 I Street

1620-18

Sacramento, CA 95814

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---

**From:** Ethan Turner  
**Sent:** Wednesday, January 12, 2022 9:09 PM  
**To:** 'Margarita Salazar, Esq.' <[Margarita@msalazarlaw.com](mailto:Margarita@msalazarlaw.com)>; 'Kevin Knox' <[kevin@msalazarlaw.com](mailto:kevin@msalazarlaw.com)>  
**Cc:** Michael Yun <[Michael.Yun@doj.ca.gov](mailto:Michael.Yun@doj.ca.gov)>; Harinder Kapur <[Harinder.Kapur@Doj.Ca.Gov](mailto:Harinder.Kapur@Doj.Ca.Gov)>  
**Subject:** RE: Meet and Confer Conversation

Margarita,

In my below email, I *mistakenly* stated that the Court ordered Mr. Kachian to provide responses to his discovery January 21<sup>st</sup>.

The order actually requires that the responses be provided “within 10 days” of the order. The order was issued and served on you on January 10th, so the correct deadline imposed by the Court is January 20th.

Sorry about that.

Thanks again,

Ethan

***Ethan Turner***

**Deputy Attorney General III**

**California Department of Justice**



**Office of the Attorney General**

**Division of Civil Law**

**Cannabis Control Section**

1300 I Street

1620-18

Sacramento, CA 95814

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---

**From:** Ethan Turner

**Sent:** Wednesday, January 12, 2022 12:35 PM

**To:** Margarita Salazar, Esq. <[Margarita@msalazarlaw.com](mailto:Margarita@msalazarlaw.com)>; Kevin Knox <[kevin@msalazarlaw.com](mailto:kevin@msalazarlaw.com)>

**Cc:** Michael Yun <[Michael.Yun@doj.ca.gov](mailto:Michael.Yun@doj.ca.gov)>; Harinder Kapur <[Harinder.Kapur@Doj.Ca.Gov](mailto:Harinder.Kapur@Doj.Ca.Gov)>

**Subject:** RE: Meet and Confer Conversation

Margarita,

I'm following up on my emails from this morning regarding the mediation, the proposed stipulation that I sent on January 7<sup>th</sup>, regarding the consolidation of the Plaintiff agencies, the discovery matters we discussed on January 5<sup>th</sup>, and the order that was issued by the Court on Monday (which was served to you on the same day, but is attached for reference).

### **Mediation**

As noted in my email this morning to case manager for retired judge, Gail Andler, on which you were copied we've now all agreed to the mediator, the date, and to the fee splitting proposal made by Ian Stewart. As indicated by Mr. Levington, in his email, our mediation briefs are due on February 21<sup>st</sup>. We are hopeful that we will have a fruitful mediation session.

### **Stipulation**

Mr. Stewart indicated that he would agree to the stipulation I sent on the 7<sup>th</sup>. Let me know if you have had a chance to review it. I have attached it to this email for your easy reference.

### **Discovery**

After our discussion on January 5, you indicated that you would get back to us after your discussion with your clients about further discovery responses. We not heard back from you - Do you have any update? Based on our conversation you will be providing code compliant responses by January 21, 2022.

Please note that the Court ordered Mr. Kachian's responses to be served on the 1/21, also.

We look forward to hearing from you.

Thanks,

***Ethan Turner***

**Deputy Attorney General III**

**California Department of Justice**

**Office of the Attorney General**

**Division of Civil Law**

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1620-18

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---

**From:** Ethan Turner

**Sent:** Wednesday, January 5, 2022 1:04 PM

**To:** 'Margarita Salazar, Esq.' <[Margarita@msalazarlaw.com](mailto:Margarita@msalazarlaw.com)>

**Cc:** Harinder Kapur <[Harinder.Kapur@Doj.Ca.Gov](mailto:Harinder.Kapur@Doj.Ca.Gov)>; Michael Yun <[Michael.Yun@doj.ca.gov](mailto:Michael.Yun@doj.ca.gov)>

**Subject:** Meet and Confer Conversation

Margarita,

To confirm what we discussed earlier, you indicated that you will be meeting with your clients this afternoon in order to work on supplemental answers to discovery. You further indicated that you will call or email us tomorrow to confirm timeframes for getting the supplemental responses to us, and that you could get us the supplemental responses by January 21. We stated that we have been trying to get responses to discovery for 6 months now, and we would like to see your additional discovery requests by noon on Friday 1/21.

We also discussed issue of mediation and I told you I would send you the initial settlement letter that was authorized by our clients. It is attached to this email.

Please feel free to send a counter offer with justification, including supporting documentation, for the offer.

Thanks,

***Ethan Turner***

**Deputy Attorney General III**

**California Department of Justice**

**Office of the Attorney General**

**Division of Civil Law**

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1620-18

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--

--m

**Margarita Salazar, Esq.**  
**Law Offices of Margarita Salazar, A Professional Law Corporation**  
**470 Third Avenue, Suite 9**  
**Chula Vista, California 91910**  
**Cell / Text: 619.994.9578**  
**Fax: 877.264.4695**

# **Exhibit 5**

**From:** [Ethan Turner](#)  
**To:** [Margarita Salazar, Esq.](#)  
**Cc:** [Kevin Knox](#); [Michael Yun](#); [Harinder Kapur](#)  
**Subject:** RE: Meet and Confer Conversation  
**Date:** Thursday, January 20, 2022 9:42:12 AM

---

Margarita,

We will accept whatever you deliver tomorrow and we are looking forward to seeing it. Your earlier email asked for a 2 day extension. Was that for the defendants other than Kachian?

We are willing to accept service electronically. No need to mail anything, just serve Harinder, Michael, and I via email.

Also, please let us know whether your clients will participate in mediation and when you have signed the mediation agreement.

Thanks,

***Ethan Turner***  
**Deputy Attorney General III**  
**California Department of Justice**  
**Office of the Attorney General**  
**Division of Civil Law**  
**Cannabis Control Section**  
1300 I Street  
1620-18  
[Sacramento, CA 95814](#)  
Office: (916) 210-7898



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---

**From:** Margarita Salazar, Esq. <Margarita@msalazarlaw.com>  
**Sent:** Thursday, January 20, 2022 9:15 AM  
**To:** Ethan Turner <Ethan.Turner@doj.ca.gov>  
**Cc:** Kevin Knox <kevin@msalazarlaw.com>; Michael Yun <Michael.Yun@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>  
**Subject:** Re: Meet and Confer Conversation

**EXTERNAL EMAIL:** This message was sent from outside DOJ. Please do not click links or open attachments that appear suspicious.

Ethan,

I just responded to the other email. We can get discovery responses out by tomorrow. Please let me know if you agree to the additional time.

Thanks.

--m

On Wed, Jan 12, 2022 at 9:09 PM Ethan Turner <[Ethan.Turner@doj.ca.gov](mailto:Ethan.Turner@doj.ca.gov)> wrote:

Margarita,

In my below email, I *mistakenly* stated that the Court ordered Mr. Kachian to provide responses to his discovery January 21<sup>st</sup>.

The order actually requires that the responses be provided “within 10 days” of the order. The order was issued and served on you on January 10th, so the correct deadline imposed by the Court is January 20th.

Sorry about that.

Thanks again,

Ethan

***Ethan Turner***

**Deputy Attorney General III  
California Department of Justice  
Office of the Attorney General  
Division of Civil Law  
Cannabis Control Section  
1300 I Street**



1620-18

Sacramento, CA 95814

Office: (916) 210-7898



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---

**From:** Ethan Turner

**Sent:** Wednesday, January 12, 2022 12:35 PM

**To:** Margarita Salazar, Esq. <[Margarita@msalazarlaw.com](mailto:Margarita@msalazarlaw.com)>; Kevin Knox <[kevin@msalazarlaw.com](mailto:kevin@msalazarlaw.com)>

**Cc:** Michael Yun <[Michael.Yun@doj.ca.gov](mailto:Michael.Yun@doj.ca.gov)>; Harinder Kapur <[Harinder.Kapur@Doj.Ca.Gov](mailto:Harinder.Kapur@Doj.Ca.Gov)>

**Subject:** RE: Meet and Confer Conversation

Margarita,

I'm following up on my emails from this morning regarding the mediation, the proposed stipulation that I sent on January 7<sup>th</sup>, regarding the consolidation of the Plaintiff agencies, the discovery matters we discussed on January 5<sup>th</sup>, and the order that was issued by the Court on Monday (which was served to you on the same day, but is attached for reference).

**Mediation**

As noted in my email this morning to case manager for retired judge, Gail Andler, on which you were copied we've now all agreed to the mediator, the date, and to the fee splitting proposal made by Ian Stewart. As indicated by Mr. Levington, in his email, our mediation briefs are due on February 21<sup>st</sup>. We are hopeful that we will have a fruitful mediation session.

**Stipulation**

Mr. Stewart indicated that he would agree to the stipulation I sent on the 7<sup>th</sup>. Let me know if you have had a chance to review it. I have attached it to this email for your easy reference.

## Discovery

After our discussion on January 5, you indicated that you would get back to us after your discussion with your clients about further discovery responses. We not heard back from you - Do you have any update? Based on our conversation you will be providing code compliant responses by January 21, 2022.

Please note that the Court ordered Mr. Kachian's responses to be served on the 1/21, also.

We look forward to hearing from you.

Thanks,

***Ethan Turner***

**Deputy Attorney General III  
California Department of Justice  
Office of the Attorney General  
Division of Civil Law  
Cannabis Control Section  
1300 I Street  
1620-18  
Sacramento, CA 95814  
Office: (916) 210-7898**



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---

**From:** Ethan Turner

**Sent:** Wednesday, January 5, 2022 1:04 PM

**To:** 'Margarita Salazar, Esq.' <[Margarita@msalazarlaw.com](mailto:Margarita@msalazarlaw.com)>

**Cc:** Harinder Kapur <[Harinder.Kapur@Doj.Ca.Gov](mailto:Harinder.Kapur@Doj.Ca.Gov)>; Michael Yun <[Michael.Yun@doj.ca.gov](mailto:Michael.Yun@doj.ca.gov)>

**Subject:** Meet and Confer Conversation

Margarita,

To confirm what we discussed earlier, you indicated that you will be meeting with your clients this afternoon in order to work on supplemental answers to discovery. You further indicated that you will call or email us tomorrow to confirm timeframes for getting the supplemental responses to us, and that you could get us the supplemental responses by January 21. We stated that we have been trying to get responses to discovery for 6 months now, and we would like to see your additional discovery requests by noon on Friday 1/21.

We also discussed issue of mediation and I told you I would send you the initial settlement letter that was authorized by our clients. It is attached to this email.

Please feel free to send a counter offer with justification, including supporting documentation, for the offer.

Thanks,

***Ethan Turner***

**Deputy Attorney General III  
California Department of Justice  
Office of the Attorney General  
Division of Civil Law  
Cannabis Control Section  
1300 I Street  
1620-18  
Sacramento, CA 95814  
Office: (916) 210-7898**



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--

--m

**Margarita Salazar, Esq.**

**Law Offices of Margarita Salazar, A Professional Law Corporation**

**470 Third Avenue, Suite 9**

**Chula Vista, California 91910**

**Cell / Text: 619.994.9578**

**Fax: 877.264.4695**

# **Exhibit 6**

## Ethan Turner

---

**From:** Ethan Turner  
**Sent:** Tuesday, January 25, 2022 9:53 AM  
**To:** 'Margarita Salazar, Esq.'; 'Kevin Knox'  
**Cc:** Michael Yun; Harinder Kapur  
**Subject:** FW: California Department of Public Health vs. Vertical Bliss, Inc. et al. - JAMS Ref No. 1200059240  
**Attachments:** Engagement Agreement\_1.pdf  
**Importance:** High  
**ProfiledItem:** true

Margarita,

Please let us know whether you will be able to meet Mr. Levington's deadline set forth below.

Also, please provide us with an update regarding your efforts to comply with the Court's order compelling Kachian's responses. As you know, the order required Kachian's responses to discovery set no. 1 to be produced five days ago.

Please also provide us with an update regarding whether you intend to produce complete responses discovery responses from your other clients. Trial is now less than six months away. We will be forced to file another motion to compel regarding those defendants if we do not receive code-complaint responses to the discovery that was originally more than five months ago.

Thanks,

-Ethan

***Ethan Turner***  
**Deputy Attorney General III**  
**California Department of Justice**  
**Office of the Attorney General**  
**Division of Civil Law**  
**Cannabis Control Section**  
1300 I Street  
1620-18  
Sacramento, CA 95814  
Office: (916) 210-7898



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---

**From:** Matthew Levington <MLEvington@jamsadr.com>

**Sent:** Tuesday, January 25, 2022 9:41 AM

**To:** margarita@msalazarlaw.com

**Cc:** Helen Koh <Helen.Koh@doj.ca.gov>; ian.stewart@wilsonelser.com; Ethan Turner <Ethan.Turner@doj.ca.gov>; Michael Yun <Michael.Yun@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Kevin Knox <kevin@msalazarlaw.com>

**Subject:** RE: California Department of Public Health vs. Vertical Bliss, Inc. et al. - JAMS Ref No. 1200059240

**Importance:** High

**EXTERNAL EMAIL:** This message was sent from outside DOJ. Please do not click links or open attachments that appear suspicious.

Dear Ms. Salazar,

This serves as a follow up to the below and for status of your executed engagement agreement for the above matter *tentatively* held on Judge Andler's calendar for 2/28.

Due to Judge Andler's high demand and impacted calendar, I cannot continue to hold the date without your executed agreement, confirming your intent to proceed.

Absent receipt of your executed agreement by end of business Thursday, **1/27**, the date will be removed from calendar.



**Matthew Levington**

Assistant Manager, Orange County Resolution Center  
Case Manager to Hon. Gail Andler (Ret.), Mr. Don Morrow, Esq.,  
and Hon. David A. Thompson (Ret.)

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---

**From:** Matthew Levington

**Sent:** Wednesday, January 19, 2022 9:14 AM

**To:** [Ethan.Turner@doj.ca.gov](mailto:Ethan.Turner@doj.ca.gov); [margarita@msalazarlaw.com](mailto:margarita@msalazarlaw.com); [Michael.Yun@doj.ca.gov](mailto:Michael.Yun@doj.ca.gov); [Harinder.Kapur@doj.ca.gov](mailto:Harinder.Kapur@doj.ca.gov)

**Cc:** [Helen.Koh@doj.ca.gov](mailto:Helen.Koh@doj.ca.gov); [ian.stewart@wilsonelser.com](mailto:ian.stewart@wilsonelser.com)

**Subject:** California Department of Public Health vs. Vertical Bliss, Inc. et al. - JAMS Ref No. 1200059240

Good morning Counsel,

This serves as a follow up for your executed engagement agreements forwarded via DocuSign on 1/13 for the 2/28 date tentatively held on Judge Andler's calendar. We are in receipt of Mr. Stewart's and are awaiting receipt of Mr. Turner's and Ms. Salazar's in order to move forward with confirming the date on calendar.

If easier, please feel free to print, sign and return a PDF copy of the attached, which is what was forwarded via DocuSign.

Thanks again and please let me know if you have any questions.

Best,  
Matt



**Matthew Levington**

Assistant Manager, Orange County Resolution Center  
Case Manager to Hon. Gail Andler (Ret.), Mr. Don Morrow, Esq.,  
and Hon. David A. Thompson (Ret.)

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# **Exhibit 7**

## Ethan Turner

---

**From:** Ethan Turner  
**Sent:** Wednesday, January 26, 2022 11:38 AM  
**To:** 'Margarita Salazar, Esq.'; 'Kevin Knox'  
**Cc:** Michael Yun; Harinder Kapur  
**Subject:** RE: Meet and Confer Conversation

**ProfiledItem:** true

Margarita,

Pursuant to the Court's order, Kachian's responses to Interrogatories were due six days ago, on January 20, 2022. Pursuant to representations you made in our January 5 conversation and in subsequent correspondence, you indicated that supplemental responses would be provided for your other clients to cure the defective responses that were previously provided, by January 21, 2022. Subsequently, you informed us that you needed time to provide responses and would have them to us by Monday, January 24, 2022.

As I previously indicated, the responses received from Vertical Bliss, Inc., Kushy Punch, Inc., Conglomerate Marketing, LLC, More Agency Inc., Arutyun Barsamyan, and Mike A. Toroyan were uniformly defective for the following reasons and have not been cured:

1. The answers given are 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 made without connecting the questions to any "specific ground for the objection." (Code Civ. Proc., § 2030.240, subd. (b).)

With respect to Mr. Kachian, no discovery responses have yet been received. Also note, that pursuant to the Court's order, the RFAs sent to Mr. Kachian have all been deemed admitted.

If there is anything to discuss regarding any of these matters you may call me. However, I believe our prior conversations together with this email constitute adequate efforts to meet and confer prior to filing additional motions to compel, which we now intend to do.

Additionally, if your clients have any interest in taking part in mediation, which the Court ordered us to engage in, please respond to Mr. Levinson's email from yesterday and please execute the mediation agreement by the deadline he set.

Thanks,

Ethan

***Ethan Turner***  
**Deputy Attorney General III**  
**California Department of Justice**  
**Office of the Attorney General**  
**Division of Civil Law**  
**Cannabis Control Section**  
1300 I Street  
1620-18

# **Exhibit 8**



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

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Joshua B. Eisenberg	Attorney	2/28/22	Gen-04	Analysis/ Strategy	Discussion and analysis with litigation team regarding sanctions against Kachian for abuse of discovery process.	0.50	\$110.00
		3/17/22	Gen-29	Supervisory Review	Reviewed and edited DAG Yun's draft motion for sanctions against defendant Kachian, sent track edited copy to SAAG Kapur for further consideration and review.	1.50	\$330.00
		3/18/22	Gen-29	Supervisory Review	Supervisory review of DAG Yun's declaration in support of motion for sanctions.	1.00	\$220.00
		3/24/22	Gen-29	Supervisory Review	Reviewed and edited motion for sanctions, sent to SAAG Kapur for further review.	0.50	\$110.00
		3/29/22	Gen-29	Supervisory Review	Received, reviewed, and edited DAG Yun's draft declaration in support of motion for sanctions against Kachian and Salazar.	0.25	\$55.00
Joshua B. Eisenberg - Total							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Harinder K. Kapur	Attorney	1/12/22	Gen-04	Analysis/ Strategy	Discuss next steps with DAG Yun; meeting with Ms. Campbell.	0.50	\$110.00
		2/16/22	Gen-05	Client Communication	Meeting with Ms. Campbell to discuss case.	0.50	\$110.00
Harinder K. Kapur - Total							



Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



## Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

[illegible]



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

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Ethan A. Turner	Attorney	1/19/22	Gen-06	Communication with Other Party	Sent another follow up email to Salazar regarding discovery and mediation.	0.25	\$55.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		1/25/22	Gen-06	Communication with Other Party	[REDACTED] Sent email to Salazar regarding mediation, discovery, and her failure to comply with Court order. Printed email to PDF for attachment to declaration and saved in Prolaw.	0.50	\$110.00



Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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





Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



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

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Ethan A. Turner	Attorney						
		2/10/22	Gen-04	Analysis/Strategy	Spoke to co-DAG Yun and corresponded via email regarding deadline for motion for sanctions based upon the hearing reservation date. Discussed the type of sanctions we would seek.	1.00	\$220.00



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

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Ethan A. Turner	Attorney						
		3/2/22	Gen-32	Case Management	Correspondence regarding motion to compel, motion of sanctions, regarding defendants' refusal to comply with discovery requests	0.50	\$110.00
		3/24/22	Gen-32	Case Management	Read DAG Yun's motion for sanctions and corresponded and spoke with Yun about appearing at a hearing and whether or not the present motion could be consolidated with the motion to compel responses to Request for Production of Documents.	1.25	\$275.00



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

From Jan 11, 2022 To Apr 4, 2022

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



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

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Michael Yun	Attorney	1/12/22	Gen-04	Analysis/Strategy	Reviewed emails from co-counsel DAG Ethan Turner and SAAG Harinder Kapur regarding communication to opposing counsel Margarita Salazar and replied.	0.25	\$55.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		1/13/22	Gen-06	Communication with Other Party	Reviewed co-counsel DAG Ethan Turner's email to opposing counsel Margarita Salazar regarding notice of court order.	0.25	\$55.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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





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

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Michael Yun	Attorney	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		1/21/22	Gen-12	Discovery-Offensive	Reviewed email from opposing counsel Margarita Salazar regarding timeframe of incoming discovery responses.	0.25	\$55.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]





Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



## Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

[illegible]



Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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





Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



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

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Michael Yun	Attorney						
		2/28/22	Gen-15	Other Submission/ Motion/ Appearance	Teleconference regarding Request for Sanction Motion against Defendant Ruben Kachian; discussed with DAG Ethan Turner, SDAG Josh Eisenberg, and SAAG Harinder Kapur.	0.50	\$110.00
		3/1/22	Gen-02	Research	Legal research on motions for sanctions, types thereof, and relevant statutes.	2.75	\$605.00
		3/2/22	Gen-04	Analysis/ Strategy	Reviewed court's previous tentative ruling on motion to compel against Defendant Ruben Kachian, minute order reflecting court's adoption of the ruling, and our previously served Notice of Court's Order, in order to strategize approach for motion for sanctions against Kachian for violation of the court's discovery order.	1.00	\$220.00



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

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Michael Yun	Attorney	3/4/22	Gen-15	Other Submission/ Motion/ Appearance	Drafted Motion for Sanctions against Defendant Ruben Kachian for failure to comply with court's discovery order.	2.50	\$550.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		3/7/22	Gen-04	Analysis/ Strategy	Teleconference with SDAG Josh Eisenberg, SAAG Harinder Kapur, and co-counsel DAG Ethan Turner regarding Request for Sanction motion as to Defendant Ruben Kachian.	0.50	\$110.00
		3/8/22	Gen-02	Research	Researched case laws regarding issue sanctions and evidence sanctions; sheperdized them.	2.75	\$605.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		3/8/22	Gen-15	Other Submission/ Motion/ Appearance	Worked on Motion for Sanctions against defendant Ruben Kachian.	2.50	\$550.00
		3/9/22	Gen-04	Analysis/ Strategy	Reviewed Notice of Court's Order, dated January 10, 2022	0.25	\$55.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		3/9/22	Gen-15	Other Submission/ Motion/ Appearance	Worked on Motion for Sanctions against defendant Ruben Kachian.	2.50	\$550.00



## Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Michael Yun	Attorney	3/10/22	Gen-15	Other Submission/ Motion/ Appearance	Worked on Motion for Sanctions against defendant Ruben Kachian and emailed finished initial draft to co-counsel DAG Ethan Turner, SDAG Josh Eisenberg, and SAAG Harinder Kapur for their review and feedback.	2.25	\$495.00
		3/11/22	Gen-04	Analysis/ Strategy	Emailed SDAG Josh Eisenberg and SAAG Harinder Kapur to discuss status of Motion for Sanctions against defendant Ruben Kachian.	0.25	\$55.00
		3/11/22	Gen-15	Other Submission/ Motion/ Appearance	Worked on Declaration of DAG Michael Yun in Support of Motion for Sanctions against Defendant Ruben Kachian.	0.25	\$55.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		3/14/22	Gen-15	Other Submission/ Motion/ Appearance	Drafted Declaration of DAG Michael Yun in Support of Motion for Sanctions against Defendant Ruben Kachian; reviewed Notice of Court's Order; reviewed Court's discovery order.	1.75	\$385.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]





Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



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

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Michael Yun	Attorney						
		3/18/22	Gen-15	Other Submission/ Motion/ Appearance	Discussed Motion for Sanctions with SAAG Harinder Kapur on the phone.	0.75	\$165.00





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

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Michael Yun	Attorney	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		3/22/22	Gen-15	Other Submission/ Motion/ Appearance	Reviewed feedback from SDAG Josh Eisenberg and SAAG Harinder Kapur on Motion for Sanctions; made revisions on the motion.	1.00	\$220.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Transaction Detail for Matter(s): SA2020800072

From Jan 11, 2022 To Apr 4, 2022

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



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

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Michael Yun	Attorney						
		3/24/22	Gen-15	Other Submission/ Motion/ Appearance	Additional work on Motion for Sanctions against Defendant Ruben Kachian and his attorney of record Margarita Salazar; reviewed relevant supporting documents.	4.00	\$880.00
		3/28/22	Gen-15	Other Submission/ Motion/ Appearance	Reviewed additional edits and feedback from SDAG Joshua Eisenberg and SAAG Harinder Kapur for Motion for Sanctions against Defendant Ruben Kachian and his attorney of record Margarita Salazar; made revisions; reviewed document; emailed revised document to client DCC staff counsel Peggy Campbell for client review.	2.25	\$495.00



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

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Michael Yun	Attorney						
		3/29/22	Gen-15	Other Submission/ Motion/ Appearance	Additional work on Declaration in Support of Motion for Sanctions against Defendant Ruben Kachian and his attorney of record Margarita Salazar; reviewed prior correspondences between opposing counsel Margarita Salazar and the AGO; emailed SDAG Josh Eisenberg and SAAG Harinder Kapur.	0.75	\$165.00
		3/29/22	Gen-15	Other Submission/ Motion/ Appearance	Emailed Senior Legal Analyst Helen Koh to request formatting assistance on Motion for Sanctions against Defendant Ruben Kachian.	0.25	\$55.00
		3/29/22	Gen-15	Other Submission/ Motion/ Appearance	Reviewed email from SAAG Harinder Kapur regarding Declaration in Support of Motion for Sanctions.	0.25	\$55.00
		3/29/22	Gen-15	Other Submission/ Motion/ Appearance	Teleconference with Senior Legal Analyst Helen Koh on formatting issues in Motion for Sanctions against Defendant Ruben Kachian.	0.25	\$55.00



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

From Jan 11, 2022 To Apr 4, 2022

SA2020800072 - CDPH; BCC v. Vertical Bliss, Inc. (Unlicensed Activity)							
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Michael Yun	Attorney	4/4/22	Gen-15	Other Submission/ Motion/ Appearance	Additional work on Declaration in Support of Motion for Sanctions against Defendant Ruben Kachian and defense attorney Margarita Salazar.	0.25	\$55.00
Michael Yun - Total							
SA2020800072 - Total							