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9

EXEMPT FROM FILING FEES
GOV. CODE, § 6103

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

Case No. 20CHCV00560

DECLARATION OF DEPUTY
ATTORNEY GENERAL MICHAEL YUN
IN SUPPORT OF MOTION FOR
SANCTIONS AGAINST DEFENDANT
MORE AGENCY, INC. AND ITS
ATTORNEY OF RECORD FOR
VIOLATING COURT'S DISCOVERY
ORDER

Date: July 14, 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. 184726643116

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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. As part of my assignment to this case as counsel for Plaintiff, I have reviewed and am
9 familiar with the document entitled "Declaration of Ethan Turner in Support of Motion to Compel
10 [Further] Responses and Request for Sanctions as to More Agency, Inc." (hereinafter, "Turner
11 Dec.") previously filed with this Court on February 7, 2022 under Reservation No.
12 836588969879. I am attaching a true and correct copy of the Turner Dec. to this declaration as
13 Exhibit A.

14 3. On February 4, 2022, I caused to be served on counsel for Defendant, Margarita
15 Salazar (hereinafter, "Salazar"), the Notice of Motion, Motion and Memorandum of Points and
16 Authorities in Support of Motion to Compel More Agency, Inc. to Make Further Responses to
17 Interrogatories, Set One, Requests for Production, Set One, and Motion for Court to Deem
18 Requests for Admissions, Set One Admitted (hereinafter, "Motion to Compel Further
19 Responses.>").¹

20 4. On February 7, 2022, our Office filed with this Court the Motion to Compel Further
21 Responses. (*Id.*)

22 5. On May 26, 2022, the Motion to Compel Further Responses was called for hearing in
23 this Court. Neither Defendant nor its attorney of record, Margarita Salazar, appeared at the
24 hearing, and the motion was unopposed. The Court took the matter under submission, adopted its
25 tentative ruling, and issued its final order in the form of a minute order. A true and correct copy
26 of the Court Order, dated May 26, 2022 is attached hereto as Exhibit B.

27
28 ¹ See "Declaration of Service" attached to Motion to Compel Further Responses filed with
this Court on February 7, 2022, as to Defendant More Agency, Inc.

1 6. On May 3, 2022, Plaintiff's Motion for Sanctions against co-Defendant Ruben
2 Kachian, also represented by Salazar, was heard in this Court. During the hearing, the Court
3 ordered Plaintiff's counsel and Salazar to meet and confer within five days to discuss and attempt
4 to resolve any issues pertaining to outstanding discovery ahead of the scheduled and/or reserved
5 discovery motion hearings on calendar, including this current motion.

6 7. On May 6, 2022, counsel for the parties including Salazar, my co-counsel Deputy
7 Attorney General Ethan Turner, my supervisor Supervising Deputy Attorney General Joshua
8 Eisenberg, and I attended a telephonic meet and confer to discuss the outstanding defense
9 discovery responses in this case. During the meet and confer, Salazar represented that she would
10 provide all responses and further responses to (1) Form Interrogatories, (2) Requests for
11 Admissions, and (3) Requests for Production of Documents as to the seven defendants she
12 represents in this case, including More Agency, Inc., by May 13, 2022.

13 8. To the date of this declaration, Defendant and Salazar have failed to provide the
14 Court ordered further responses or a privilege log, and have not paid the monetary sanction.
15 Neither have Defendant and Salazar provided any justification for the failure to provide further
16 responses in violation of the Court's discovery order, dated May 26, 2022. To date, it has been
17 one year since the initial discovery requests were served upon Defendant.

18 Cost Declaration

19 9. Plaintiff has requested that the Court award \$1,576.67 in monetary sanction as to as to
20 each of the six defendants against whom the Motions for Sanctions are being contemporaneously
21 filed—(1) Vertical Bliss, Inc., (2) Kushy Punch, Inc., (3) Conglomerate Marketing, LLC, (4)
22 More Agency, Inc., (5) Arutyun Barsamyan, and (6) Mike A. Toroyan. This equates to a
23 combined total of \$9,460.00 in monetary sanctions for these motions.. The request is based on
24 the number of hours worked by me and my supervisor as a direct consequence of Defendant
25 willfully disobeying the Court's discovery order, issued on May 26, 2022.

26 10. In addition to my work, Supervising Deputy Attorney General Joshua Eisenberg
27 participated in the attempt to resolve this discovery matter and to hold Defendant and Salazar
28 accountable for willfully disobeying this Court's order:

- 1 a. Supervising Deputy Attorney General Joshua Eisenberg’s hourly billing rate is
2 \$220. Mr. Eisenberg undertook 3.0 hours of work as a consequence of
3 Defendant More Agency, Inc. and Salazar willfully disobeying this Court’s
4 order and his total billing for such work amounts to \$660.00.
- 5 b. I spent 22.00 hours preparing the Motion for Sanctions and other accompanying
6 documents in support of the motion. My hourly billing rate is \$220, so the total
7 costs incurred for the work which I have had to undertake to date as a
8 consequence of Defendant More Agency, Inc. and Salazar willfully disobeying
9 this Court’s order is \$4,840.00.
- 10 c. Collectively, as of the date of this filing, \$5,500.00 in legal service fees were
11 incurred in addressing and preparing the motion in response to six defendants’—
12 including Defendant—and Salazar’s willful disobedience of this Court’s order.
- 13 d. Additionally, I intend to appear remotely at the hearing reserved for July 14,
14 2022, and anticipate spending an additional three hours of billable hours to
15 review any opposition, to prepare for the hearing, and appear at the hearing
16 itself. This estimated additional time will probably be less than that which will
17 actually be incurred and if this turns out to be a significant underestimation, a
18 supplemental declaration with documentation will be filed ahead of the hearing.
19 This anticipated time will also be charged at \$220 per hour and will total
20 \$660.00.

21 11. The Office of the Attorney General maintains time records in a central computer
22 system. Attorneys directly input their time into preset descriptive categories listed in the
23 timekeeping software. Attached to this Declaration as Exhibit C is a true and correct copy of the
24 statement for attorney services rendered for this matter prepared at my request by the Department
25 of Justice, Office of the Attorney General. Attorney/client privileged information, attorney work
26 product, and descriptions of work performed that are unrelated to the motion to compel further
27 discovery responses have been redacted from the report. Where entire entries are redacted, we
28 are not requesting to recover costs for that entry. The smallest increment of time used by the

1 California Department of Justice, Office of the Attorney General, to bill its clients is 0.25,
2 referring to 15 minutes or less. I have reviewed the report for accuracy.

3 12. Therefore, the total attorney hours reflected in the “Transaction Detail for Matter(s):
4 SA2020800072” Reports for which compensation is sought are 28.00 hours, plus the anticipated
5 time discussed below. “SA2020800072” is the Office of the Attorney General’s internal matter
6 identification number for the current case.

7 13. Based on the above, the total costs that will be incurred by Plaintiff as a consequence
8 of Defendant More Agency, Inc. and Salazar willfully disobeying this Court’s order amount to
9 \$1,576.67.

10
11 This declaration is executed under penalty of perjury under the laws of the State of
12 California this 17th day of June, 2022, at Los Angeles, California.

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15 MICHAEL J. YUN
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Exhibit A

1 ROB BONTA
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2 HARINDER KAPUR
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3 ETHAN A. TURNER
Deputy Attorney General
4 State Bar No. 294891
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Attorneys for Plaintiffs
8 *Department of Cannabis Control*

EXEMPT FROM FILING FEES
GOV. CODE, § 6103

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

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

16 Plaintiffs,

17 v.

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

23 Defendant
24
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Case No. 20CHCV00560

**DECLARATION OF ETHAN TURNER IN
SUPPORT OF MOTION TO COMPEL
RESPONSES AND REQUEST FOR
SANCTIONS AS TO MORE AGENCY,
INC.**

Date: May 24, 2022 (To be heard on
May 26, 2022 – Six Motions)
Time: 8:30 a.m.
Dept: F49
Judge: The Honorable Stephen P. Pfahler

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

RESERVATION NO. 836588969879

1 I, Ethan Turner declare as follows:

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

8 2. On June 14, 2021, Plaintiffs California Department of Public Health and the
9 Bureau of Cannabis Control (collectively, Plaintiffs) propounded Form Interrogatories, Set One,
10 Requests for Production, Set One, and Requests for Admission, Set one on Defendant More
11 Agency, Inc. True and correct copies of these documents are attached hereto as Exhibits 1, 2, 3.

12 3. On July 19, 2021, a three-week extension on the due date for discovery responses
13 was agreed to, making the due date August 9, 2021. A true and correct copy of the email
14 exchange requesting and granting the extension is attached hereto as Exhibit 4.

15 4. On August 3, 2021, David Carroll, Counsel for More Agency, Inc. requested an
16 additional two-week extension to provide responses. Plaintiffs agreed to extend the date for
17 responses to August 17, 2021. A true and correct copy of the email exchange requesting and
18 granting the extension is attached hereto as Exhibit 5.

19 5. On August 17, 2021, Counsel for More Agency, Inc. requested an extension of the
20 due date of discovery to October 18, 2021. Plaintiffs again granted the extension. A true and
21 correct copy of the email exchange requesting and granting the extension is attached hereto as
22 Exhibit 6.

23 6. On October 13, 2021, Counsel for More Agency, Inc. requested yet another
24 extension of the due date of discovery responses to November 1, 2021. Plaintiffs offered an
25 extension to October 25, 2021, and stated that there would be no more extensions. A true and
26 correct copy of the email exchange requesting and granting the extension is attached hereto as
27 Exhibit 7.

28 ///

1 7. On October 26, 2021, the day after the discovery responses were due, I sent an
2 email to Counsel for More Agency, Inc. letting him know, that if he had not already mailed the
3 discovery responses, they could be served electronically. Later that day, Counsel for More
4 Agency, Inc. wrote a follow up email stating that the discovery responses would be served one
5 week after the expiration of the fourth extension of the deadline for responses. A true and correct
6 copy of the email and response are attached as Exhibit 8.

7 8. On November 1, 2021, Responses to the requests for admissions, requests for
8 production, and interrogatories, that had been served on June 14, 2021, were received. The
9 responses comprised exclusively of boiler plate objections. These responses are attached as
10 Exhibits 9, 10, and 11.

11 9. On November 5, 2021, I sent an email to Counsel for More Agency, Inc. stating
12 that the received responses did not meet the minimum standards required under the California
13 Code of Civil Procedure. A true and correct copy of the email is attached as Exhibit 12.

14 10. On November 15, 2021, Counsel for More Agency, Inc. responded that he is
15 continuing to make efforts to secure substantive responses to the Plaintiffs' discovery requests. A
16 true and correct copy of the email is attached as Exhibit 13.

17 11. On November 23, 2021, Counsel for More Agency, Inc. indicated that he had been
18 unsuccessful in securing any substantive responses. A true and correct copy of the email is
19 attached as Exhibit 14.

20 12. On December 21, 2021, Margarita Salazar filed a substitution of attorney and
21 undertook the representation of More Agency, Inc. A true and correct copy of the substitution of
22 attorney form served upon Counsel for Plaintiffs is attached as Exhibit 15.

23 13. On December 21, 2021, I sent an email to Margarita Salazar, Counsel for More
24 Agency, Inc. to inform her that the discovery responses provided by Defendants Vertical Bliss,
25 Inc., Kushy Punch, Inc., Conglomerate Marketing, LLC, and More Agency, Inc., fail to comply
26 with the requirements of the Civil Discovery Act and included in the email an email previously
27 sent to prior counsel of record informing of the same. A true and correct copy of the email is
28 attached as Exhibit 16. In the same email, I requested scheduling a meet and confer for

1 December 22, 2021. (*Id.*)

2 14. On January 3, 2022, not having received from Counsel for More Agency, Inc. a
3 response to my email, dated December 21, 2021, I sent her a follow up email to request again a
4 meet and confer. A true and correct copy of the email is attached as Exhibit 17.

5 15. On January 4, 2022, I received email replies from Counsel for More Agency, Inc.
6 indicating she is available for meet and confer on January 5, 2022. A true and correct copy of the
7 emails are attached as Exhibit 18.

8 16. On January 5, 2022, Counsel for More Agency, Inc., my co-counsel Deputy
9 Attorney General Michael Yun, my supervisor Senior Assistant Attorney General Harinder
10 Kapur, and I met and conferred via teleconference. During the phone call, Counsel for More
11 Agency, Inc. stated she will speak with Defendant on January 6, 2022, and that she will provide
12 the supplemental responses to interrogatories, Set One, requests for admissions, Set One, and
13 requests for production, Set One, in two (2) weeks. Both parties agreed that Defendant will
14 provide the supplemental responses by noon on Friday, January 21, 2021. Additionally, both
15 parties agreed that Counsel for Defendant will send a follow up email to Counsel for Plaintiffs
16 after her conversation with Defendant on January 6, 2022, to re-confirm that supplemental
17 responses will be turned over to Counsel for Plaintiffs as scheduled by noon on Friday, January
18 21, 2021.

19 17. On January 5, 2022, after the meet and confer, I sent an email to Counsel for More
20 Agency, Inc. to document and confirm More Agency, Inc. is to provide the supplemental
21 responses as to the interrogatories, requests for admissions, and requests for production of records
22 by noon on Friday, January 21, 2022. A true and correct copy of the email is attached as Exhibit
23 19. In the same email was a reminder for her to contact Counsel for Plaintiff to confirm the
24 above timeframe on January 6, 2022, after her meeting with her client. (*Id.*)

25 18. Between January 5 and January 19, 2022, I did not receive any email or phone call
26 from Counsel for More Agency, Inc. regarding either the agreed upon confirmation or the agreed
27 upon supplemental responses to the discovery requests.

28 19. On January 7, 2022, I received an email from Counsel for More Agency, Inc.

1 regarding the topic of mediation, but she did not respond to or discuss the agreed upon
2 supplemental responses to discovery requests in her email. A true and correct copy of the email
3 is attached as Exhibit 20.

4 20. On January 10, 2022, I received an email from Counsel for More Agency, Inc.
5 regarding the topic of mediation, but she did not respond to or discuss the agreed upon
6 supplemental responses to discovery requests in her email. A true and correct copy of the email
7 is attached as Exhibit 21.

8 21. On January 12, 2022, I sent a follow up email to Counsel for More Agency, Inc.
9 regarding the above-referenced discovery matters discussed with her during the meet and confer
10 on January 5, 2022, (1) to inform her again that I have not heard back from her, (2) to ask her for
11 an update, and (3) to remind her that she agreed to provide the Code compliant supplemental
12 responses by January 21, 2022. A true and correct copy of the emails are attached as Exhibit 22.

13 22. On January 19, 2022, I sent another follow up email to Counsel for More Agency,
14 Inc. regarding the above-referenced discovery matters. A true and correct copy of the email is
15 attached as Exhibit 23.

16 23. On January 19, 2022, I received an email reply, entitled "OUT DUE TO COVID-
17 19 RE: Meet and Confer Conversation," from Counsel for More Agency, Inc. with the following
18 words contained in the narrative of the email: "I will be out of the office today with limited phone
19 and email access. I will return all calls and emails when I return to the office." A true and correct
20 copy of the email is attached as Exhibit 24.

21 24. On January 19, 2022, I sent an email to Kevin Knox who is known to me as an
22 employee of the law office of Counsel for More Agency, Inc. to request an update on the status of
23 the production of the responses to the discovery requests and included Counsel for More Agency,
24 Inc. as a co-recipient of the email. A true and correct copy of the email is attached as Exhibit 25.

25 25. On January 20, 2022, I received an email from Counsel for More Agency, Inc.
26 requesting a two (2) days extension to provide the discovery. A true and correct copy of the
27 email is attached as Exhibit 26. In the same email, she stated she "will get the discovery out by
28 tomorrow." (*Id.*)

26. On January 20, 2022, I sent an email to Counsel for More Agency, Inc. that Plaintiff will accept service of the discovery electronically transmitted to my co-counsel Deputy Attorney General Michael Yun, my supervisor Senior Assistant Attorney General Harinder Kapur, and myself. A true and correct copy of the email is attached as Exhibit 27.

27. On January 21, 2022 Counsel for More Agency, Inc. sent an email indicating that she would be unable to provide promised discovery responses by close of business and would be providing them on the following Monday. I sent a response email indicating that we would accept whatever she provides, but that we could not extend the Court imposed deadline for Kachian's discovery responses and that we would not be waiving our right to compel discovery. A true and correct copy of this correspondence is attached as Exhibit 28.

28. On January 25, 2022, I sent an email to Counsel for Defendant requesting an update on the status of discovery requests. A true and correct copy of the email is attached as Exhibit 29.

29. On January 26, 2022, still having received no responses at all, I sent an email to Counsel for Defendant, again, requesting an update on the status of her responses to the discovery requests and, as of the date of execution of the declaration and filing of these papers, Counsels for Plaintiff have not received any discovery responses or any communication from Counsel for Defendant regarding their status. A true and correct copy of the email is attached as Exhibit 30.

This declaration is executed under penalty of perjury under the laws of the State of California this 3rd day of February, 2022, at Rancho Cordova, California.


ETHAN A. TURNER

Exhibit 1

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address):

Ethan A. Turner (SBN 294891), Patrick Boyne (SBN 279667)

Office of the Attorney General

1300 I Street, Sacramento, CA 95814

TELEPHONE NO.: (916) 210-7898

FAX NO. (Optional):

E-MAIL ADDRESS (Optional): Patrick.Boyne@doj.ca.gov

ATTORNEY FOR (Name): Plaintiffs California Department of Public Health, et al.

SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles

SHORT TITLE OF CASE:

California Department of Public Health, et al. v. Vertical Bliss, Inc., et al.

FORM INTERROGATORIES—GENERAL

CASE NUMBER:

20CHCV00560

Asking Party: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

Answering Party: MORE AGENCY, INC.

Set No.: ONE

Sec. 1. Instructions to All Parties

- (a) Interrogatories are written questions prepared by a party to an action that are sent to any other party in the action to be answered under oath. The interrogatories below are form interrogatories approved for use in civil cases.
- (b) For time limitations, requirements for service on other parties, and other details, see Code of Civil Procedure sections 2030.010–2030.410 and the cases construing those sections.
- (c) These form interrogatories do not change existing law relating to interrogatories nor do they affect an answering party's right to assert any privilege or make any objection.
- (d) If you do not have enough personal knowledge to fully answer an interrogatory, say so, but make a reasonable and good faith effort to get the information by asking other persons or organizations, unless the information is equally available to the asking party.
- (e) Each answer must be as complete and straightforward as the information reasonably available to you, including the information possessed by your attorneys or agents, permits. If an interrogatory cannot be answered completely, answer it to the extent possible.
- (f) Whenever an interrogatory may be answered by referring to a document, the document may be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer to the interrogatory can be found.
- (g) Whenever an address and telephone number for the same person are requested in more than one interrogatory, you are required to furnish them in answering only the first interrogatory asking for that information.
- (h) If you are asserting a privilege or making an objection to an interrogatory, you must specifically assert the privilege or state the objection in your written response.
- (i) Your answers to these interrogatories must be verified, dated, and signed. You may wish to use the following form at the end of your answers:

Sec. 2. Instructions to the Asking Party

- (a) These interrogatories are designed for optional use by parties in unlimited civil cases where the amount demanded exceeds \$25,000. Separate interrogatories, *Form Interrogatories—Limited Civil Cases (Economic Litigation)* (form DISC-004), which have no subparts, are designed for use in limited civil cases where the amount demanded is \$25,000 or less; however, those interrogatories may also be used in unlimited civil cases.
- (b) Check the box next to each interrogatory that you want the answering party to answer. Use care in choosing those interrogatories that are applicable to the case.
- (c) You may insert your own definition of **INCIDENT** in Section 4, but only where the action arises from a course of conduct or a series of events occurring over a period of time.
- (d) The interrogatories in section 16.0, Defendant's Contentions—Personal Injury, should not be used until the defendant has had a reasonable opportunity to conduct an investigation or discovery of plaintiff's injuries and damages.
- (e) Additional interrogatories may be attached.

Sec. 3. Instructions to the Answering Party

- (a) An answer or other appropriate response must be given to each interrogatory checked by the asking party.
- (b) As a general rule, within 30 days after you are served with these interrogatories, you must serve your responses on the asking party and serve copies of your responses on all other parties to the action who have appeared. See Code of Civil Procedure sections 2030.260–2030.270 for details.

I declare under penalty of perjury under the laws of the State of California that the foregoing answers are true and correct.

(Date)

(SIGNATURE)

Sec. 4. Definitions

Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

- (a) (Check one of the following):

- ☒ (1) **INCIDENT** includes the circumstances and events surrounding the alleged accident, injury, or other occurrence or breach of contract giving rise to this action or proceeding.

☐ (2) **INCIDENT** means (insert your definition here or on a separate, attached sheet labeled "Sec. 4(a)(2)");

- (b) **YOU OR ANYONE ACTING ON YOUR BEHALF** includes you, your agents, your employees, your insurance companies, their agents, their employees, your attorneys, your accountants, your investigators, and anyone else acting on your behalf.
- (c) **PERSON** includes a natural person, firm, association, organization, partnership, business, trust, limited liability company, corporation, or public entity.
- (d) **DOCUMENT** means a writing, as defined in Evidence Code section 250, and includes the original or a copy of handwriting, typewriting, printing, photostats, photographs, electronically stored information, and every other means of recording upon any tangible thing and form of communicating or representation, including letters, words, pictures, sounds, or symbols, or combinations of them.
- (e) **HEALTH CARE PROVIDER** includes any **PERSON** referred to in Code of Civil Procedure section 667.7(e)(3).
- (f) **ADDRESS** means the street address, including the city, state, and zip code.

Sec. 5. Interrogatories

The following interrogatories have been approved by the Judicial Council under Code of Civil Procedure section 2033.710:

CONTENTS

- 1.0 Identity of Persons Answering These Interrogatories
- 2.0 General Background Information—Individual
- 3.0 General Background Information—Business Entity
- 4.0 Insurance
- 5.0 [Reserved]
- 6.0 Physical, Mental, or Emotional Injuries
- 7.0 Property Damage
- 8.0 Loss of Income or Earning Capacity
- 9.0 Other Damages
- 10.0 Medical History
- 11.0 Other Claims and Previous Claims
- 12.0 Investigation—General
- 13.0 Investigation—Surveillance
- 14.0 Statutory or Regulatory Violations
- 15.0 Denials and Special or Affirmative Defenses
- 16.0 Defendant's Contentions Personal Injury
- 17.0 Responses to Request for Admissions
- 18.0 [Reserved]
- 19.0 [Reserved]
- 20.0 How the Incident Occurred—Motor Vehicle
- 25.0 [Reserved]
- 30.0 [Reserved]
- 40.0 [Reserved]
- 50.0 Contract
- 60.0 [Reserved]
- 70.0 Unlawful Detainer [See separate form DISC-003]
- 101.0 Economic Litigation [See separate form DISC-004]
- 200.0 Employment Law [See separate form DISC-002] Family Law [See separate form FL-145]

1.0 Identity of Persons Answering These Interrogatories

- ☒ 1.1 State the name, **ADDRESS**, telephone number, and relationship to you of each **PERSON** who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

2.0 General Background Information individual—

- ☐ 2.1 State:
 - (a) your name;
 - (b) every name you have used in the past; and
 - (c) the dates you used each name.
- ☐ 2.2 State the date and place of your birth.
- ☐ 2.3 At the time of the **INCIDENT**, did you have a driver's license? If so state:
 - (a) the state or other issuing entity;
 - (b) the license number and type;
 - (c) the date of issuance; and
 - (d) all restrictions.
- ☐ 2.4 At the time of the **INCIDENT**, did you have any other permit or license for the operation of a motor vehicle? If so, state:
 - (a) the state or other issuing entity;
 - (b) the license number and type;
 - (c) the date of issuance; and
 - (d) all restrictions.
- ☐ 2.5 State:
 - (a) your present residence **ADDRESS**;
 - (b) your residence **ADDRESSES** for the past five years; and
 - (c) the dates you lived at each **ADDRESS**.
- ☐ 2.6 State:
 - (a) the name, **ADDRESS**, and telephone number of your present employer or place of self-employment; and
 - (b) the name, **ADDRESS**, dates of employment, job title, and nature of work for each employer or self-employment you have had from five years before the **INCIDENT** until today.
- ☐ 2.7 State:
 - (a) the name and **ADDRESS** of each school or other academic or vocational institution you have attended, beginning with high school;
 - (b) the dates you attended;
 - (c) the highest grade level you have completed; and
 - (d) the degrees received.
- ☐ 2.8 Have you ever been convicted of a felony? If so, for each conviction state:
 - (a) the city and state where you were convicted;
 - (b) the date of conviction;
 - (c) the offense; and
 - (d) the court and case number.
- ☐ 2.9 Can you speak English with ease? If not, what language and dialect do you normally use?
- ☐ 2.10 Can you read and write English with ease? If not, what language and dialect do you normally use?

☐ 2.11 At the time of the **INCIDENT** were you acting as an agent or employee for any **PERSON**? If so, state:

- (a) the name, **ADDRESS**, and telephone number of that **PERSON**; and
- (b) a description of your duties.

☐ 2.12 At the time of the **INCIDENT** did you or any other person have any physical, emotional, or mental disability or condition that may have contributed to the occurrence of the **INCIDENT**? If so, for each person state:

- (a) the name, **ADDRESS**, and telephone number;
- (b) the nature of the disability or condition; and
- (c) the manner in which the disability or condition contributed to the occurrence of the **INCIDENT**.

☐ 2.13 Within 24 hours before the **INCIDENT** did you or any person involved in the **INCIDENT** use or take any of the following substances: alcoholic beverage, marijuana, or other drug or medication of any kind (prescription or not)? If so, for each person state:

- (a) the name, **ADDRESS**, and telephone number;
- (b) the nature or description of each substance;
- (c) the quantity of each substance used or taken;
- (d) the date and time of day when each substance was used or taken;
- (e) the **ADDRESS** where each substance was used or taken;
- (f) the name, **ADDRESS**, and telephone number of each person who was present when each substance was used or taken; and
- (g) the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who prescribed or furnished the substance and the condition for which it was prescribed or furnished.

3.0 General Background Information—Business Entity

☒ 3.1 Are you a corporation? If so, state:

- (a) the name stated in the current articles of incorporation;
- (b) all other names used by the corporation during the past 10 years and the dates each was used;
- (c) the date and place of incorporation;
- (d) the **ADDRESS** of the principal place of business; and
- (e) whether you are qualified to do business in California.

☒ 3.2 Are you a partnership? If so, state:

- (a) the current partnership name;
- (b) all other names used by the partnership during the past 10 years and the dates each was used;
- (c) whether you are a limited partnership and, if so, under the laws of what jurisdiction;
- (d) the name and **ADDRESS** of each general partner; and
- (e) the **ADDRESS** of the principal place of business.

☒ 3.3 Are you a limited liability company? If so, state:

- (a) the name stated in the current articles of organization;
- (b) all other names used by the company during the past 10 years and the date each was used;
- (c) the date and place of filing of the articles of organization;
- (d) the **ADDRESS** of the principal place of business; and
- (e) whether you are qualified to do business in California.

☒ 3.4 Are you a joint venture? If so, state:

- (a) the current joint venture name;
- (b) all other names used by the joint venture during the past 10 years and the dates each was used;
- (c) the name and **ADDRESS** of each joint venturer; and
- (d) the **ADDRESS** of the principal place of business.

☒ 3.5 Are you an unincorporated association? If so, state:

- (a) the current unincorporated association name;
- (b) all other names used by the unincorporated association during the past 10 years and the dates each was used; and
- (c) the **ADDRESS** of the principal place of business.

☒ 3.6 Have you done business under a fictitious name during the past 10 years? If so, for each fictitious name state:

- (a) the name;
- (b) the dates each was used;
- (c) the state and county of each fictitious name filing; and
- (d) the **ADDRESS** of the principal place of business.

☒ 3.7 Within the past five years has any public entity registered or licensed your business? If so, for each license or registration:

- (a) identify the license or registration;
- (b) state the name of the public entity; and
- (c) state the dates of issuance and expiration.

4.0 Insurance

☒ 4.1 At the time of the **INCIDENT**, was there in effect any policy of insurance through which you were or might be insured in any manner (for example, primary, pro-rata, or excess liability coverage or medical expense coverage) for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, for each policy state:

- (a) the kind of coverage;
- (b) the name and **ADDRESS** of the insurance company;
- (c) the name, **ADDRESS**, and telephone number of each named insured;
- (d) the policy number;
- (e) the limits of coverage for each type of coverage contained in the policy;
- (f) whether any reservation of rights or controversy or coverage dispute exists between you and the insurance company; and
- (g) the name, **ADDRESS**, and telephone number of the custodian of the policy.

☒ 4.2 Are you self-insured under any statute for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, specify the statute.

5.0 [Reserved]

6.0 Physical, Mental, or Emotional Injuries

☐ 6.1 Do you attribute any physical, mental, or emotional injuries to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 6.2 through 6.7).

☐ 6.2 Identify each injury you attribute to the **INCIDENT** and the area of your body affected.

☐ 6.3 Do you still have any complaints that you attribute to the **INCIDENT**? If so, for each complaint state:

- (a) a description;
- (b) whether the complaint is subsiding, remaining the same, or becoming worse; and
- (c) the frequency and duration.

☐ 6.4 Did you receive any consultation or examination (except from expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310) or treatment from a **HEALTH CARE PROVIDER** for any injury you attribute to the **INCIDENT**? If so, for each **HEALTH CARE PROVIDER** state:

- (a) the name, **ADDRESS**, and telephone number;
- (b) the type of consultation, examination, or treatment provided;
- (c) the dates you received consultation, examination, or treatment; and
- (d) the charges to date.

☐ 6.5 Have you taken any medication, prescribed or not, as a result of injuries that you attribute to the **INCIDENT**? If so, for each medication state:

- (a) the name;
- (b) the **PERSON** who prescribed or furnished it;
- (c) the date it was prescribed or furnished;
- (d) the dates you began and stopped taking it; and
- (e) the cost to date.

☐ 6.6 Are there any other medical services necessitated by the injuries that you attribute to the **INCIDENT** that were not previously listed (for example, ambulance, nursing, prosthetics)? If so, for each service state:

- (a) the nature;
- (b) the date;
- (c) the cost; and
- (d) the name, **ADDRESS**, and telephone number of each provider.

☐ 6.7 Has any **HEALTH CARE PROVIDER** advised that you may require future or additional treatment for any injuries that you attribute to the **INCIDENT**? If so, for each injury state:

- (a) the name and **ADDRESS** of each **HEALTH CARE PROVIDER**;
- (b) the complaints for which the treatment was advised; and
- (c) the nature, duration, and estimated cost of the treatment.

7.0 Property Damage

☐ 7.1 Do you attribute any loss of or damage to a vehicle or other property to the **INCIDENT**? If so, for each item of property:

- (a) describe the property;
- (b) describe the nature and location of the damage to the property;

(c) state the amount of damage you are claiming for each item of property and how the amount was calculated; and

(d) if the property was sold, state the name, **ADDRESS**, and telephone number of the seller, the date of sale, and the sale price.

☐ 7.2 Has a written estimate or evaluation been made for any item of property referred to in your answer to the preceding interrogatory? If so, for each estimate or evaluation state:

- (a) the name, **ADDRESS**, and telephone number of the **PERSON** who prepared it and the date prepared;
- (b) the name, **ADDRESS**, and telephone number of each **PERSON** who has a copy of it; and
- (c) the amount of damage stated.

☐ 7.3 Has any item of property referred to in your answer to interrogatory 7.1 been repaired? If so, for each item state:

- (a) the date repaired;
- (b) a description of the repair;
- (c) the repair cost;
- (d) the name, **ADDRESS**, and telephone number of the **PERSON** who repaired it;
- (e) the name, **ADDRESS**, and telephone number of the **PERSON** who paid for the repair.

8.0 Loss of Income or Earning Capacity

☐ 8.1 Do you attribute any loss of income or earning capacity to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 8.2 through 8.8).

☐ 8.2 State:

- (a) the nature of your work;
- (b) your job title at the time of the **INCIDENT**; and
- (c) the date your employment began.

☐ 8.3 State the last date before the **INCIDENT** that you worked for compensation.

☐ 8.4 State your monthly income at the time of the **INCIDENT** and how the amount was calculated.

☐ 8.5 State the date you returned to work at each place of employment following the **INCIDENT**.

☐ 8.6 State the dates you did not work and for which you lost income as a result of the **INCIDENT**.

☐ 8.7 State the total income you have lost to date as a result of the **INCIDENT** and how the amount was calculated.

☐ 8.8 Will you lose income in the future as a result of the **INCIDENT**? If so, state:

- (a) the facts upon which you base this contention;
- (b) an estimate of the amount;
- (c) an estimate of how long you will be unable to work; and
- (d) how the claim for future income is calculated.

9.0 Other Damages

- ☐ 9.1 Are there any other damages that you attribute to the **INCIDENT**? If so, for each item of damage state:
- (a) the nature;
 - (b) the date it occurred;
 - (c) the amount; and
 - (d) the name, **ADDRESS**, and telephone number of each **PERSON** to whom an obligation was incurred.
- ☐ 9.2 Do any **DOCUMENTS** support the existence or amount of any item of damages claimed in interrogatory 9.1? If so, describe each document and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

10.0 Medical History

- ☐ 10.1 At any time before the **INCIDENT** did you have complaints or injuries that involved the same part of your body claimed to have been injured in the **INCIDENT**? If so, for each state:
- (a) a description of the complaint or injury;
 - (b) the dates it began and ended; and
 - (c) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** whom you consulted or who examined or treated you.
- ☐ 10.2 List all physical, mental, and emotional disabilities you had immediately before the **INCIDENT**. (*You may omit mental or emotional disabilities unless you attribute any mental or emotional injury to the **INCIDENT**.*)
- ☐ 10.3 At any time after the **INCIDENT**, did you sustain injuries of the kind for which you are now claiming damages? If so, for each incident giving rise to an injury state:
- (a) the date and the place it occurred;
 - (b) the name, **ADDRESS**, and telephone number of any other **PERSON** involved;
 - (c) the nature of any injuries you sustained;
 - (d) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** who you consulted or who examined or treated you; and
 - (e) the nature of the treatment and its duration.

11.0 Other Claims and Previous Claims

- ☐ 11.1 Except for this action, in the past 10 years have you filed an action or made a written claim or demand for compensation for your personal injuries? If so, for each action, claim, or demand state:
- (a) the date, time, and place and location (closest street **ADDRESS** or intersection) of the **INCIDENT** giving rise to the action, claim, or demand;
 - (b) the name, **ADDRESS**, and telephone number of each **PERSON** against whom the claim or demand was made or the action filed;

- (c) the court, names of the parties, and case number of any action filed;
- (d) the name, **ADDRESS**, and telephone number of any attorney representing you;
- (e) whether the claim or action has been resolved or is pending; and
- (f) a description of the injury.

- ☐ 11.2 In the past 10 years have you made a written claim or demand for workers' compensation benefits? If so, for each claim or demand state:
- (a) the date, time, and place of the **INCIDENT** giving rise to the claim;
 - (b) the name, **ADDRESS**, and telephone number of your employer at the time of the injury;
 - (c) the name, **ADDRESS**, and telephone number of the workers' compensation insurer and the claim number;
 - (d) the period of time during which you received workers' compensation benefits;
 - (e) a description of the injury;
 - (f) the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who provided services; and
 - (g) the case number at the Workers' Compensation Appeals Board.

12.0 Investigation—General

- ☐ 12.1 State the name, **ADDRESS**, and telephone number of each individual:
- (a) who witnessed the **INCIDENT** or the events occurring immediately before or after the **INCIDENT**;
 - (b) who made any statement at the scene of the **INCIDENT**;
 - (c) who heard any statements made about the **INCIDENT** by any individual at the scene; and
 - (d) who **YOU OR ANYONE ACTING ON YOUR BEHALF** claim has knowledge of the **INCIDENT** (except for expert witnesses covered by Code of Civil Procedure section 2034).
- ☐ 12.2 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** interviewed any individual concerning the **INCIDENT**? If so, for each individual state:
- (a) the name, **ADDRESS**, and telephone number of the individual interviewed;
 - (b) the date of the interview; and
 - (c) the name, **ADDRESS**, and telephone number of the **PERSON** who conducted the interview.
- ☐ 12.3 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** obtained a written or recorded statement from any individual concerning the **INCIDENT**? If so, for each statement state:
- (a) the name, **ADDRESS**, and telephone number of the individual from whom the statement was obtained;
 - (b) the name, **ADDRESS**, and telephone number of the individual who obtained the statement;
 - (c) the date the statement was obtained; and
 - (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original statement or a copy.

☐ 12.4 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any photographs, films, or videotapes depicting any place, object, or individual concerning the **INCIDENT** or plaintiff's injuries? If so, state:

- (a) the number of photographs or feet of film or videotape;
- (b) the places, objects, or persons photographed, filmed, or videotaped;
- (c) the date the photographs, films, or videotapes were taken;
- (d) the name, **ADDRESS**, and telephone number of the individual taking the photographs, films, or videotapes; and
- (e) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the photographs, films, or videotapes.

☐ 12.5 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any diagram, reproduction, or model of any place or thing (except for items developed by expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310) concerning the **INCIDENT**? If so, for each item state:

- (a) the type (i.e., diagram, reproduction, or model);
- (b) the subject matter; and
- (c) the name, **ADDRESS**, and telephone number of each **PERSON** who has it.

☐ 12.6 Was a report made by any **PERSON** concerning the **INCIDENT**? If so, state:

- (a) the name, title, identification number, and employer of the **PERSON** who made the report;
- (b) the date and type of report made;
- (c) the name, **ADDRESS**, and telephone number of the **PERSON** for whom the report was made; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the report.

☐ 12.7 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** inspected the scene of the **INCIDENT**? If so, for each inspection state:

- (a) the name, **ADDRESS**, and telephone number of the individual making the inspection (except for expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310); and
- (b) the date of the inspection.

13.0 Investigation—Surveillance

☐ 13.1 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** conducted surveillance of any individual involved in the **INCIDENT** or any party to this action? If so, for each surveillance state:

- (a) the name, **ADDRESS**, and telephone number of the individual or party;
- (b) the time, date, and place of the surveillance;
- (c) the name, **ADDRESS**, and telephone number of the individual who conducted the surveillance; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of any surveillance photograph, film, or videotape.

☐ 13.2 Has a written report been prepared on the surveillance? If so, for each written report state:

- (a) the title;
- (b) the date;
- (c) the name, **ADDRESS**, and telephone number of the individual who prepared the report; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy.

14.0 Statutory or Regulatory Violations

☐ 14.1 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** contend that any **PERSON** involved in the **INCIDENT** violated any statute, ordinance, or regulation and that the violation was a legal (proximate) cause of the **INCIDENT**? If so, identify the name, **ADDRESS**, and telephone number of each **PERSON** and the statute, ordinance, or regulation that was violated.

☐ 14.2 Was any **PERSON** cited or charged with a violation of any statute, ordinance, or regulation as a result of this **INCIDENT**? If so, for each **PERSON** state:

- (a) the name, **ADDRESS**, and telephone number of the **PERSON**;
- (b) the statute, ordinance, or regulation allegedly violated;
- (c) whether the **PERSON** entered a plea in response to the citation or charge and, if so, the plea entered; and
- (d) the name and **ADDRESS** of the court or administrative agency, names of the parties, and case number.

15.0 Denials and Special or Affirmative Defenses

☒ 15.1 Identify each denial of a material allegation and each special or affirmative defense in your pleadings and for each:

- (a) state all facts upon which you base the denial or special or affirmative defense;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
- (c) identify all **DOCUMENTS** and other tangible things that support your denial or special or affirmative defense, and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

16.0 Defendant's Contentions—Personal Injury

☐ 16.1 Do you contend that any **PERSON**, other than you or plaintiff, contributed to the occurrence of the **INCIDENT** or the injuries or damages claimed by plaintiff? If so, for each **PERSON**:

- (a) state the name, **ADDRESS**, and telephone number of the **PERSON**;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.2 Do you contend that plaintiff was not injured in the **INCIDENT**? If so:

- (a) state all facts upon which you base your contention;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (c) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.3 Do you contend that the injuries or the extent of the injuries claimed by plaintiff as disclosed in discovery proceedings thus far in this case were not caused by the **INCIDENT**? If so, for each injury:

- (a) identify it;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.4 Do you contend that any of the services furnished by any **HEALTH CARE PROVIDER** claimed by plaintiff in discovery proceedings thus far in this case were not due to the **INCIDENT**? If so:

- (a) identify each service;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.5 Do you contend that any of the costs of services furnished by any **HEALTH CARE PROVIDER** claimed as damages by plaintiff in discovery proceedings thus far in this case were not necessary or unreasonable? If so:

- (a) identify each cost;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.6 Do you contend that any part of the loss of earnings or income claimed by plaintiff in discovery proceedings thus far in this case was unreasonable or was not caused by the **INCIDENT**? If so:

- (a) identify each part of the loss;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.7 Do you contend that any of the property damage claimed by plaintiff in discovery Proceedings thus far in this case was not caused by the **INCIDENT**? If so:

- (a) identify each item of property damage;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.8 Do you contend that any of the costs of repairing the property damage claimed by plaintiff in discovery proceedings thus far in this case were unreasonable? If so:

- (a) identify each cost item; state all facts upon which you base your contention;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

☐ 16.9 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** (for example, insurance bureau index reports) concerning claims for personal injuries made before or after the **INCIDENT** by a plaintiff in this case? If so, for each plaintiff state:

- (a) the source of each **DOCUMENT**;
- (b) the date each claim arose;
- (c) the nature of each claim; and
- (d) the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

☐ 16.10 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** concerning the past or present physical, mental, or emotional condition of any plaintiff in this case from a **HEALTH CARE PROVIDER** not previously identified (except for expert witnesses covered by Code of Civil Procedure sections 2034.210–2034.310)? If so, for each plaintiff state:

- (a) the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER**;
- (b) a description of each **DOCUMENT**; and
- (c) the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

17.0 Responses to Request for Admissions

☒ 17.1 Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission:

- (a) state the number of the request;
- (b) state all facts upon which you base your response;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your response and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

18.0 [Reserved]

19.0 [Reserved]

20.0 How the Incident Occurred—Motor Vehicle

☐ 20.1 State the date, time, and place of the **INCIDENT** (closest street **ADDRESS** or intersection).

☐ 20.2 For each vehicle involved in the **INCIDENT**, state:

- (a) the year, make, model, and license number;
- (b) the name, **ADDRESS**, and telephone number of the driver;

- (c) the name, **ADDRESS**, and telephone number of each occupant other than the driver;
- (d) the name, **ADDRESS**, and telephone number of each registered owner;
- (e) the name, **ADDRESS**, and telephone number of each lessee;
- (f) the name, **ADDRESS**, and telephone number of each owner other than the registered owner or lien holder; and
- (g) the name of each owner who gave permission or consent to the driver to operate the vehicle.

☐ 20.3 State the **ADDRESS** and location where your trip began and the **ADDRESS** and location of your destination.

☐ 20.4 Describe the route that you followed from the beginning of your trip to the location of the **INCIDENT**, and state the location of each stop, other than routine traffic stops, during the trip leading up to the **INCIDENT**.

☐ 20.5 State the name of the street or roadway, the lane of travel, and the direction of travel of each vehicle involved in the **INCIDENT** for the 500 feet of travel before the **INCIDENT**.

☐ 20.6 Did the **INCIDENT** occur at an intersection? If so, describe all traffic control devices, signals, or signs at the intersection.

☐ 20.7 Was there a traffic signal facing you at the time of the **INCIDENT**? If so, state:

- (a) your location when you first saw it;
- (b) the color;
- (c) the number of seconds it had been that color; and
- (d) whether the color changed between the time you first saw it and the **INCIDENT**.

☐ 20.8 State how the **INCIDENT** occurred, giving the speed, direction, and location of each vehicle involved:

- (a) just before the **INCIDENT**;
- (b) at the time of the **INCIDENT**; and (c) just after the **INCIDENT**.

☐ 20.9 Do you have information that a malfunction or defect in a vehicle caused the **INCIDENT**? If so:

- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and
- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.

☐ 20.10 Do you have information that any malfunction or defect in a vehicle contributed to the injuries sustained in the **INCIDENT**? If so:

- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and

- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.

☐ 20.11 State the name, **ADDRESS**, and telephone number of each owner and each **PERSON** who has had possession since the **INCIDENT** of each vehicle involved in the **INCIDENT**.

25.0 [Reserved]

30.0 [Reserved]

40.0 [Reserved]

50.0 Contract

☐ 50.1 For each agreement alleged in the pleadings:

- (a) identify each **DOCUMENT** that is part of the agreement and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (b) state each part of the agreement not in writing, the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to that provision, and the date that part of the agreement was made;
- (c) identify all **DOCUMENTS** that evidence any part of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (d) identify all **DOCUMENTS** that are part of any modification to the agreement, and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (e) state each modification not in writing, the date, and the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to the modification, and the date the modification was made;
- (f) identify all **DOCUMENTS** that evidence any modification of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**.

☐ 50.2 Was there a breach of any agreement alleged in the pleadings? If so, for each breach describe and give the date of every act or omission that you claim is the breach of the agreement.

☐ 50.3 Was performance of any agreement alleged in the pleadings excused? If so, identify each agreement excused and state why performance was excused.

☐ 50.4 Was any agreement alleged in the pleadings terminated by mutual agreement, release, accord and satisfaction, or novation? If so, identify each agreement terminated, the date of termination, and the basis of the termination.

☐ 50.5 Is any agreement alleged in the pleadings unenforceable? If so, identify each unenforceable agreement and state why it is unenforceable.

☐ 50.6 Is any agreement alleged in the pleadings ambiguous? If so, identify each ambiguous agreement and state why it is ambiguous.

60.0 [Reserved]

DECLARATION OF SERVICE BY U.S. MAIL

Case Name: **California Department of Public Health, et al. v. Vertical Bliss, Inc., et al.**
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 June 14, 2021, I served the attached **FORM INTERROGATORIES – GENERAL, SET ONE TO MORE AGENCY, INC.** by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550, addressed as follows:

Ivy A. Wang
David J. Carroll
Browne, George, Ross, O'Brien,
Annaguey, and Ellis LLP
2121 Avenue of the Stars, Suite 2800
Los Angeles, CA 90067

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 June 14, 2021, at Sacramento, California.

K. Oleynik

Declarant



Signature

Exhibit 2

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
PATRICK BOYNE
5 Deputy Attorney General
State Bar No. 279667
6 1300 I Street, Suite 125
P.O. Box 944255
7 Sacramento, CA 94244-2550
Telephone: (916) 210-7898
8 E-mail: Ethan.Turner@doj.ca.gov
E-mail: Patrick.Boyne@doj.ca.gov
9 *Attorneys for Plaintiffs California Department of
Public Health and Bureau of Cannabis Control*

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 COUNTY OF LOS ANGELES

13 NORTH VALLEY DISTRICT - CHATSWORTH COURTHOUSE

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

18 Plaintiffs,

19 v.

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

28 Defendants.

Case No. 20CHCV00560

**PLAINTIFF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH'S
REQUESTS FOR ADMISSION TO
DEFENDANT MORE AGENCY, INC.,
SET ONE**

Dept: F49
Judge: Hon. Stephen P. Pfahler

Trial Date: TBD
Action Filed: September 23, 2020

1 PROPOUNDED BY: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

2 RESPONSES BY: MORE AGENCY, INC.

3 SET ONE

4 Plaintiff California Department of Public Health requests that Defendant More Agency,
5 Inc. answer under oath, pursuant to Code of Civil Procedure section 2033.010, et seq., the
6 following Requests for Admission:

7 **DEFINITIONS**

8 1. "YOU" refers to Responding Party, its agents, employees, and anyone else acting on its
9 behalf.

10 2. "PREMISES" refers to 8415 Canoga Avenue and 8427 Canoga Avenue, Canoga Park,
11 CA 91304.

12 3. "COMMERCIAL CANNABIS LICENSE" refers to a state license issued pursuant to
13 Division 10 of the Business and Professions Code by the California Department of Public
14 Health's Manufactured Cannabis Safety Branch or the Bureau of Cannabis Control permitting a
15 licensee to engage in COMMERCIAL CANNABIS ACTIVITY at a particular location or
16 premises as identified in Business and Professions Code section 26001, subdivision (y), and
17 encompasses "A-License" and "M-license," as identified in Business and Professions Code
18 section 26001, subdivisions (a) and (ae).

19 4. "COMMERCIAL CANNABIS ACTIVITY" refers to the cultivation, possession,
20 manufacture, distribution, processing, storing, laboratory testing, packaging, labeling,
21 transportation, delivery, or sale of CANNABIS and CANNABIS PRODUCTS, as identified in
22 Business and Professions Code section 26001, subdivision (k).

23 5. "CANNABIS" refers to all parts of the plant Cannabis sativa Linnaeus, Cannabis
24 indica, or Cannabis ruderalis, whether growing or not; the seeds thereof; the resin, whether crude
25 or purified, extracted from any part of the plant; and every compound, manufacture, salt,
26 derivative, mixture, or preparation of the plant, its seeds, or resin; and also the separated resin,
27 whether crude or purified, obtained from cannabis, as identified in Business and Professions Code
28 section 26001, subdivision (f).

1 6. "CANNABIS PRODUCT(S)" refers to CANNABIS that has undergone a process
2 whereby the plant material has been transformed into a concentrate, including, but not limited to,
3 concentrated cannabis, or an edible or topical product containing cannabis or concentrated
4 cannabis or other ingredients, as identified in Business and Professions Code section 26001,
5 subdivision (i), Health and Safety Code section 11018.1, and Cal. Code Regs., tit. 17 section
6 40100, subdivision (j).

7 7. "COMMERCIAL MANUFACTURING CANNABIS ACTIVITY" refers to
8 compounding, blending, extracting, infusing, or otherwise making or preparing a CANNABIS
9 PRODUCT; the production, preparation, propagation, or compounding of CANNABIS or
10 CANNABIS PRODUCTS either directly or indirectly or by extraction methods, or independently
11 by means of chemical synthesis, or by a combination of extraction and chemical synthesis at a
12 fixed location that packages or repackages CANNABIS or CANNABIS PRODUCT or labels or
13 relabels its container; to all aspects of the extraction process, infusion process, and packaging and
14 labeling processes, including processing, preparing, holding, and storing of CANNABIS
15 PRODUCTS; and also includes any processing, preparing, holding, or storing of components and
16 ingredients of CANNABIS PRODUCTS, as identified in Business and Professions Code section
17 26001, subdivisions (ag) and (ah), and Cal. Code Regs., tit. 17 section 40100, subdivisions (dd)
18 and (ee).

19 8. "COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY" refers to the procurement,
20 sale, and transport of CANNABIS and CANNABIS PRODUCTS between parties required to
21 hold a COMMERCIAL CANNABIS LICENSE, as identified in Business and Professions Code
22 section 26001, subdivision (r) and Cal. Code Regs., tit. 17 section 40100, subdivision (p).

23 9. "GROSS REVENUE" refers to the gross sales of CANNABIS PRODUCTS, and the
24 revenue received from MANUFACTURING, packaging, labeling or otherwise handling
25 CANNABIS or CANNABIS PRODUCTS for parties required to hold a COMMERCIAL
26 CANNABIS LICENSE; and for a party engaged in COMMERCIAL MANUFACTURING
27 CANNABIS ACTIVITY that also engaged in COMMERCIAL DISTRIBUTOR CANNABIS
28 ACTIVITY that sells or transfers CANNABIS PRODUCTS manufactured on premises in a non-

1 arm's length transaction, the gross sales or revenue for such transactions shall be based on the
2 product's fair market value if it were to be sold in an arm's length transaction at wholesale, as
3 identified in Cal. Code Regs. tit. 17 section 40152.

4 10. "MANUFACTURING" refers to compounding, blending, extracting, infusing, or
5 otherwise making or preparing a CANNABIS PRODUCT; the production, preparation,
6 propagation, or compounding of CANNABIS or CANNABIS PRODUCTS either directly or
7 indirectly or by extraction methods, or independently by means of chemical synthesis, or by a
8 combination of extraction and chemical synthesis at a fixed location that packages or repackages
9 CANNABIS or CANNABIS PRODUCT or labels or relabels its container; to all aspects of the
10 extraction process, infusion process, and packaging and labeling processes, including processing,
11 preparing, holding, and storing of CANNABIS PRODUCTS; and also includes any processing,
12 preparing, holding, or storing of components and ingredients of CANNABIS PRODUCTS, as
13 identified in Business and Professions Code section 26001, subdivisions (ag) and (ah), and Cal.
14 Code Regs., tit. 17 section 40100, subdivisions (dd) and (ee).

15 REQUESTS FOR ADMISSION

16 **REQUEST FOR ADMISSION NO. 1:**

17 Admit that YOU owned the PREMISES in the period from April 23, 2018 to October 2,
18 2019.

19 **REQUEST FOR ADMISSION NO. 2:**

20 Admit that YOU leased the PREMISES in the period from April 23, 2018 to October 2,
21 2019.

22 **REQUEST FOR ADMISSION NO. 3:**

23 Admit that YOU operated a business at the PREMISES in the period from April 23, 2018
24 to October 2, 2019.

25 **REQUEST FOR ADMISSION NO. 4:**

26 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
27 COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period
28 from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 5:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
ACTIVITY at the PREMISES at some point in the period from April 23, 2018 to October 2,
2019.

REQUEST FOR ADMISSION NO. 6:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
ACTIVITY at the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
October 2, 2019.

REQUEST FOR ADMISSION NO. 7:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
ACTIVITY at the PREMISES, on at least 100 separate days, in the period from April 23, 2018 to
October 2, 2019.

REQUEST FOR ADMISSION NO. 8:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
ACTIVITY at the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
October 2, 2019.

REQUEST FOR ADMISSION NO. 9:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
ACTIVITY at the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to
October 2, 2019.

REQUEST FOR ADMISSION NO. 10:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
ACTIVITY at the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to
October 2, 2019.

REQUEST FOR ADMISSION NO. 11:

Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
ACTIVITY at the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to
October 2, 2019.

1 **REQUEST FOR ADMISSION NO. 12:**

2 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
3 ACTIVITY at the PREMISES, on 527 separate days, in the period from April 23, 2018 to
4 October 2, 2019.

5 **REQUEST FOR ADMISSION NO. 13:**

6 Admit that the GROSS REVENUE YOU received from COMMERCIAL
7 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
8 2018 to April 22, 2019 exceeded \$100,001.

9 **REQUEST FOR ADMISSION NO. 14:**

10 Admit that the GROSS REVENUE YOU received from COMMERCIAL
11 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
12 2018 to April 22, 2019 exceeded \$500,001.

13 **REQUEST FOR ADMISSION NO. 15:**

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
16 2018 to April 22, 2019 exceeded \$1,500,001.

17 **REQUEST FOR ADMISSION NO. 16:**

18 Admit that the GROSS REVENUE YOU received from COMMERCIAL
19 MANUFACTURING CANNABIS ACTIVITY at the PREMISES from April 23, 2018 to April
20 22, 2019 exceeded \$3,000,001.

21 **REQUEST FOR ADMISSION NO. 17:**

22 Admit that the GROSS REVENUE YOU received from COMMERCIAL
23 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
24 2018 to April 22, 2019 exceeded \$5,000,001.

25 **REQUEST FOR ADMISSION NO. 18:**

26 Admit that the GROSS REVENUE YOU received from COMMERCIAL
27 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
28 2018 to April 22, 2019 exceeded \$10,000,000.

REQUEST FOR ADMISSION NO. 19:

Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 20:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 21:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 22:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from PREMISES, on at least 100 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 23:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 24:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to October 2, 2019.

REQUEST FOR ADMISSION NO. 25:

Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to October 2, 2019.

///

1 **REQUEST FOR ADMISSION NO. 26:**

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to
4 October 2, 2019.

5 **REQUEST FOR ADMISSION NO. 27:**

6 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
7 at, to, or from the PREMISES, on 527 separate days, in the period from April 23, 2018 to October
8 2, 2019.

9 **REQUEST FOR ADMISSION NO. 28:**

10 Admit that the GROSS REVENUE YOU received from COMMERCIAL
11 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
12 23, 2018 to April 22, 2019 was more than \$1,000,000.

13 **REQUEST FOR ADMISSION NO. 29:**

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
16 23, 2018 to April 22, 2019 was more than \$2,500,000.

17 **REQUEST FOR ADMISSION NO. 30:**

18 Admit that the GROSS REVENUE YOU received from COMMERCIAL
19 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
20 23, 2018 to April 22, 2019 was more than \$5,000,000.

21 **REQUEST FOR ADMISSION NO. 31**

22 Admit that the GROSS REVENUE YOU received from COMMERCIAL
23 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
24 23, 2018 to April 22, 2019 was more than \$10,000,000.

25 **REQUEST FOR ADMISSION NO. 32:**

26 Admit that the GROSS REVENUE YOU received from COMMERCIAL
27 DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April
28 23, 2018 to April 22, 2019 was more than \$20,000,000.

1 **REQUEST FOR ADMISSION NO. 33:**

2 Admit that the GROSS REVENUE YOU received from COMMERCIAL
3 DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
4 April 22, 2019 was more than \$30,000,000.

5 **REQUEST FOR ADMISSION NO. 34:**

6 Admit that the GROSS REVENUE YOU received from COMMERCIAL
7 DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
8 April 22, 2019 was more than \$50,000,000.

9 **REQUEST FOR ADMISSION NO. 35:**

10 Admit that the GROSS REVENUE YOU received from COMMERCIAL
11 DISTRIBUTOR CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to
12 April 22, 2019 was more than \$70,000,000.

13
14 Dated: June 14, 2021

Respectfully Submitted,

15 ROB BONTA
16 Attorney General of California
17 HARINDER KAPUR
18 Senior Assistant Attorney General

19 *Patrick Boyne*

20 PATRICK BOYNE
21 Deputy Attorney General
22 *Attorneys for Plaintiffs California*
23 *Department of Public Health and Bureau*
24 *of Cannabis Control*

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26 RFA More Agency.docx
27
28

DECLARATION OF SERVICE BY U.S. MAIL

Case Name: **California Department of Public Health, et al. v. Vertical Bliss, Inc., et al.**
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 June 14, 2021, I served the attached **PLAINTIFF CALIFORNIA DEPARTMENT OF PUBLIC HEALTH'S REQUESTS FOR ADMISSION TO DEFENDANT MORE AGENCY, INC., SET ONE** by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550, addressed as follows:

Ivy A. Wang
David J. Carroll
Browne, George, Ross, O'Brien,
Annaguey, and Ellis LLP
2121 Avenue of the Stars, Suite 2800
Los Angeles, CA 90067

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 June 14, 2021, at Sacramento, California.

K. Oleynik
Declarant


Signature

Exhibit 3

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
PATRICK BOYNE
5 Deputy Attorney General
State Bar No. 279667
6 1300 I Street, Suite 125
P.O. Box 944255
7 Sacramento, CA 94244-2550
Telephone: (916) 210-7898
8 E-mail: Ethan.Turner@doj.ca.gov
E-mail: Patrick.Boyne@doj.ca.gov
9 *Attorneys for Plaintiffs California Department of
Public Health and Bureau of Cannabis Control*

11 SUPERIOR COURT OF THE STATE OF CALIFORNIA

12 COUNTY OF LOS ANGELES

13 NORTH VALLEY DISTRICT - CHATSWORTH COURTHOUSE

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

18 Plaintiffs,

19 v.

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

25 Defendants.

Case No. 20CHCV00560

**PLAINTIFF CALIFORNIA
DEPARTMENT OF PUBLIC HEALTH'S
REQUEST FOR PRODUCTION OF
DOCUMENTS TO DEFENDANT MORE
AGENCY, INC., SET ONE**

Dept: F49
Judge: Hon. Stephen P. Pfahler

Trial Date: TBD
Action Filed: September 23, 2020

26 PROPOUNDED BY: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

27 RESPONSES BY: MORE AGENCY, INC.

28 SET : ONE

1 Plaintiff California Department of Public Health requests that Defendant
2 More Agency, Inc. produce copies of or permit inspection and copying of the
3 documents described below, pursuant to Code of Civil Procedure sections 2031.010, et seq.

4 **DEFINITIONS**

5 1. "DOCUMENT" or "DOCUMENTS" refers to any written, typewritten, printed,
6 recorded or other photographic materials whatsoever, however produced or reproduced,
7 including, without limitation, drafts, notes, diaries, journals, calendars, memos, messages, letters,
8 telegrams, proposals, agreements, contracts, minutes, papers, books, statements, summaries,
9 writings, reports, presentations, graphs, charges, bills, records, assignments, working sheets,
10 drawings, diagrams, slides, photographs, posters, maps, plat maps, computer printouts, checks,
11 receipts, accounts, ledgers, expense reports, time charts, tapes, transcripts, recordings, and all
12 other tangible things and all other things which come within the definition of "writing" contained
13 in Evidence Code section 250, if the DOCUMENTS have been prepared in several copies, or
14 additional copies have been made that are not identical (or are no longer identical by reason of
15 subsequent addition or notation or other modification of the copy), each non-identical copy is a
16 separate DOCUMENT.

17 2. "PREMISES" refers to 8415 Canoga Avenue and 8427 Canoga Avenue, Canoga Park,
18 CA 91304.

19 3. "CANNABIS" refers to all parts of the plant Cannabis sativa Linnaeus, Cannabis
20 indica, or Cannabis ruderalis, whether growing or not; the seeds thereof; the resin, whether crude
21 or purified, extracted from any part of the plant; and every compound, manufacture, salt,
22 derivative, mixture, or preparation of the plant, its seeds, or resin; and also the separated resin,
23 whether crude or purified, obtained from cannabis, as identified in Business and Professions Code
24 section 26001, subdivision (f).

25 4. "CANNABIS PRODUCT(S)" refers to CANNABIS that has undergone a process
26 whereby the plant material has been transformed into a concentrate, including, but not limited to,
27 concentrated cannabis, or an edible or topical product containing cannabis or concentrated
28 cannabis or other ingredients, as identified in Business and Professions Code section 26001,

1 subdivision (i), Health and Safety Code, section 11018.1, and Cal. Code Regs., tit. 17, section
2 40100, subdivision (j).

3 5. "MANUFACTURING" refers to compounding, blending, extracting, infusing, or
4 otherwise making or preparing a CANNABIS PRODUCT; the production, preparation,
5 propagation, or compounding of CANNABIS or CANNABIS PRODUCTS either directly or
6 indirectly or by extraction methods, or independently by means of chemical synthesis, or by a
7 combination of extraction and chemical synthesis at a fixed location that packages or repackages
8 CANNABIS or CANNABIS PRODUCT or labels or relabels its container; to all aspects of the
9 extraction process, infusion process, and packaging and labeling processes, including processing,
10 preparing, holding, and storing of CANNABIS PRODUCTS; and also includes any processing,
11 preparing, holding, or storing of components and ingredients of CANNABIS PRODUCTS, as
12 identified in Business and Professions Code section 26001, subdivisions (ag) and (ah), and Cal.
13 Code Regs., tit. 17, section 40100, subdivisions (dd) and (ee).

14 6. "GROSS REVENUE" refers to the gross sales of CANNABIS PRODUCTS, and the
15 revenue received from MANUFACTURING, packaging, labeling or otherwise handling
16 CANNABIS or CANNABIS PRODUCTS for parties required to hold a COMMERCIAL
17 CANNABIS LICENSE; and for a party engaged in COMMERCIAL MANUFACTURING
18 CANNABIS ACTIVITY that also engaged in COMMERCIAL DISTRIBUTOR CANNABIS
19 ACTIVITY that sells or transfers CANNABIS PRODUCTS manufactured on premises in a non-
20 arm's length transaction, the gross sales or revenue for such transactions shall be based on the
21 product's fair market value if it were to be sold in an arm's length transaction at wholesale, as
22 identified in Cal. Code Regs. tit. 17 section 40152.

23 7. "DISTRIBUTION" refers to the procurement, sale, and transport of CANNABIS and
24 CANNABIS PRODUCTS between parties required to hold a COMMERCIAL CANNABIS
25 LICENSE, as identified in Business and Professions Code section 26001, subdivision (r) and Cal.
26 Code Regs., tit. 17, section 40100, subdivision (p).

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

28 Please produce all DOCUMENTS reflecting any and all still pictures, moving pictures,

1 photographs, digital images, videos, or any other photographic representation which identify the
2 interior of the PREMISES in the period from April 23, 2018 to October 2, 2019.

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

4 Please produce all DOCUMENTS reflecting any and all still pictures, moving pictures,
5 photographs, digital images, videos, or any other photographic representation which identify the
6 exterior of the PREMISES in the period from April 23, 2018 to October 2, 2019.

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

8 Please produce all leases pertaining to the PREMISES within the last 5 years.

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

10 Please produce all DOCUMENTS reflecting any rental payments made for the
11 PREMISES within the last 5 years.

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

13 Please produce all DOCUMENTS reflecting the purchase of the PREMISES within the
14 last 5 years.

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

16 Please produce all DOCUMENTS reflecting the sale of the PREMISES within the last 5
17 years.

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

19 Please produce any and all income and expense statements arising from any business
20 activity at the PREMISES from 2018 through the present date.

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

22 Please produce any and all asset and liability statements arising from any business activity
23 at the PREMISES from 2018 through the present date.

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

25 Please produce any and all balance sheets arising from any business activity at the
26 PREMISES from 2018 through the present date.

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

28 Please produce any and all sources and uses of cash statements arising from any business

activity at the PREMISES from 2018 through the present date.

REQUEST FOR PRODUCTION NO. 11:

Please produce any and all sources and uses of funds statements arising from any business activity at the PREMISES from 2018 through the present date.

REQUEST FOR PRODUCTION NO. 12:

Please produce any and all statements of accounts payable arising from any business activity at the PREMISES from 2018 through the present date.

REQUEST FOR PRODUCTION NO. 13:

Please produce any and all statements of accounts receivable arising from any business activity at the PREMISES from 2018 through the present date.

REQUEST FOR PRODUCTION NO. 14:

Please produce any and all equipment leases arising from any business activity at the PREMISES from 2018 through the present date.

REQUEST FOR PRODUCTION NO. 15:

Please produce any and all equipment purchase DOCUMENTS arising from any business activity at the PREMISES from 2018 through the present date.

REQUEST FOR PRODUCTION NO. 16:

Please produce any and all DOCUMENTS reflecting the sale of CANNABIS and CANNABIS PRODUCT(S) from the PREMISES from 2018 through the present date.

REQUEST FOR PRODUCTION NO. 17:

Please produce any and all DOCUMENTS reflecting the purchase of CANNABIS and CANNABIS PRODUCT(S) from the PREMISES from 2018 through the present date.

REQUEST FOR PRODUCTION NO. 18:

Please produce any and all DOCUMENTS reflecting the receipt of CANNABIS and CANNABIS PRODUCT(S) at the PREMISES from 2018 through the present date.

REQUEST FOR PRODUCTION NO. 19:

Please produce any and all DOCUMENTS reflecting any GROSS REVENUE from the MANUFACTURING of CANNABIS and CANNABIS PRODUCT(S) from the PREMISES

1 from 2018 through the present date.

2 **REQUEST FOR PRODUCTION NO. 20:**

3 Please produce any and all DOCUMENTS reflecting any GROSS REVENUE from the
4 DISTRIBUTION of CANNABIS and CANNABIS PRODUCT(S) to, from, or at the PREMISES
5 from 2018 through the present date.

6 **REQUEST FOR PRODUCTION NO. 21:**

7 Please produce YOUR articles of incorporation, including statements of information.

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

9 Please produce YOUR articles of organization, including statements of information.

10 **REQUEST FOR PRODUCTION NO. 23:**

11 Please produce any and all DOCUMENTS related to any purchase, sale, or transfer of any
12 right to use or authorization to use the Kushy Punch name, logo, or proprietary or patented
13 recipes, formulas, or ingredients used in MANUFACTURING CANNABIS PRODUCTS.

14
15 Dated: June 14, 2021

Respectfully Submitted,

16 ROB BONTA
17 Attorney General of California
18 HARINDER KAPUR
Senior Assistant Attorney General

19 *Patrick Boyne*

20
21 PATRICK BOYNE
22 Deputy Attorney General
Attorneys for Plaintiffs California
23 Department of Public Health and Bureau
of Cannabis Control

24 SA2020800072
RFP More Agency.docx

DECLARATION OF SERVICE BY U.S. MAIL

Case Name: **California Department of Public Health, et al. v. Vertical Bliss, Inc., et al.**
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 June 14, 2021, I served the attached **PLAINTIFF CALIFORNIA DEPARTMENT OF PUBLIC HEALTH'S REQUEST FOR PRODUCTION OF DOCUMENTS TO MORE AGENCY, INC., SET ONE** by placing a true copy thereof enclosed in a sealed envelope in the internal mail collection system at the Office of the Attorney General at 1300 I Street, Suite 125, P.O. Box 944255, Sacramento, CA 94244-2550, addressed as follows:

Ivy A. Wang
David J. Carroll
Browne, George, Ross, O'Brien,
Annaguey, and Ellis LLP
2121 Avenue of the Stars, Suite 2800
Los Angeles, CA 90067

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 June 14, 2021, at Sacramento, California.

K. Oleynik

Declarant



Signature

Exhibit 4

From: [David J. Carroll](#)
To: [Ethan Turner](#); [Patrick Boyne](#)
Cc: [Harinder Kapur](#); [Ivy A. Wang](#)
Subject: CDPH v. Vertical Bliss [IWOV-DOCSLA.FID365123]
Date: Thursday, July 15, 2021 3:51:34 PM
Attachments: [image001.png](#)

Ethan and Patrick,

I hope you are doing well. I wanted to formally ask for the discovery extension that we had previously discussed. Would a three-week extension (until August 9) for Defendants to serve their discovery responses work? Please let me know. Thanks!

David



David J. Carroll | Partner
801 S. Figueroa Street, Suite 2000
Los Angeles, California 90017
Main 213.725.9800 | Fax 213.725.9808
dcarroll@bgrfirm.com
www.bgrfirm.com

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From: [Ethan Turner](#)
To: ["David J. Carroll"; "iwang@bgrfirm.com"](#)
Cc: [Harinder Kapur](#); [Patrick Boyne](#)
Subject: Discovery
Date: Monday, July 19, 2021 11:05:00 AM
Attachments: [image001.jpg](#)

David and Ivy,

Pursuant to our earlier discussions, we agree to a three week (from today's date) extension of the Defendants' deadline for written discovery responses.

Thanks,

Ethan

Ethan Turner

Deputy Attorney General
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
1591211062874



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Exhibit 5

From: [Ethan Turner](#)
To: ["David J. Carroll"](#); [Ivy A. Wang](#)
Cc: [Robert White](#); [Patrick Boyne](#); [Harinder Kapur](#)
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]
Date: Wednesday, August 4, 2021 11:42:00 AM
Attachments: [image001.jpg](#)
[image002.png](#)

David,

An additional two week extension for your remaining clients is fine with us.

Thanks,

-Ethan

Ethan Turner

Deputy Attorney General
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
1591211062874



From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Tuesday, August 3, 2021 6:49 PM
To: Ethan Turner; Ivy A. Wang
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Ethan,

Could I ask you for another 2-week extension for all defendants (except Ruben Cross) to respond to Plaintiffs' discovery? As you can imagine, the substitutions of counsel going on right now for the various defendants are making it difficult to put responses together right now. Please let me know. Thank you.

David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Monday, August 2, 2021 1:47 PM
To: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Thanks David.

If there is other information that you think would be helpful, further discussion is welcome. Otherwise, I'll just look for those notices as they come in.

Thanks,

-Ethan

From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Monday, August 2, 2021 1:44 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Ivy A. Wang <iwang@bgrfirm.com>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Hi Ethan,

As of now, yes, but we do not anticipate representing them after this week. Happy to discuss further if necessary.

Thanks,
David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Monday, August 2, 2021 1:30 PM
To: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560

David and Ivy,

It appears that only Ruben Kachian is represented by Margarita Salazar. Does your firm still represent the balance of the defendants?

Thanks,

Ethan

From: Corinne Ubence <cubence@bgrfirm.com>

Sent: Monday, July 26, 2021 5:06 PM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Natalie Clark <Natalie.Clark@doj.ca.gov>

Cc: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>; Jeanne Arias <jarias@bgrfirm.com>

Subject: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560

Counsel,

Attached please find a fully executed Substitution of Attorney for the above matter. The document is being filed today.

Regards,



Corinne Ubence | Legal Assistant to
Carl A. Roth, David Carroll,
Matthew Kussman and Luke Fiedler
801 S. Figueroa Street, Suite 2000
Los Angeles, California 90017
Main 213.725.9800 | Fax 213.725.9808
cubence@bgrfirm.com
www.bgrfirm.com

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Exhibit 6

From: [David J. Carroll](#)
To: [Ethan Turner](#)
Subject: Re: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]
Date: Wednesday, August 18, 2021 12:33:40 PM
Attachments: [image001.jpg](#)
[image002.png](#)

Thank you.

On Aug 18, 2021, at 12:30 PM, Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

David,

That'll work for us. You can have your extension until October 18.

From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Tuesday, August 17, 2021 6:10 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Ivy A. Wang <iwang@bgrfirm.com>
Cc: Robert White <Robert.White@doj.ca.gov>; Patrick Boyne <Patrick.Boyne@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Ethan,

Given our pending motion to withdraw as counsel in this matter for Defendants Vertical Bliss, More Agency, Kushy Punch, Conglomerate Marketing, Arutyun Barsamyan, and Mike Toroyan, and considering the issues giving rise to that motion, would you be amenable to extending the deadline for these Defendants' discovery responses until October 18 (i.e., two weeks after the hearing date on our motion to withdraw)? Please let me know. Thank you.

David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Wednesday, August 4, 2021 11:43 AM
To: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>
Cc: Robert White <Robert.White@doj.ca.gov>; Patrick Boyne <Patrick.Boyne@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

David,

An additional two week extension for your remaining clients is fine with us.

Thanks,

-Ethan

Ethan Turner

Deputy Attorney General
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

<image001.jpg>

From: David J. Carroll <dcarroll@bgrfirm.com>

Sent: Tuesday, August 3, 2021 6:49 PM

To: Ethan Turner; Ivy A. Wang

Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560
[IWOV-DOCSLA.FID365123]

Ethan,

Could I ask you for another 2-week extension for all defendants (except Ruben Cross) to respond to Plaintiffs' discovery? As you can imagine, the substitutions of counsel going on right now for the various defendants are making it difficult to put responses together right now. Please let me know. Thank you.

David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>

Sent: Monday, August 2, 2021 1:47 PM

To: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>

Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560
[IWOV-DOCSLA.FID365123]

Thanks David.

If there is other information that you think would be helpful, further discussion is welcome. Otherwise, I'll just look for those notices as they come in.

Thanks,

-Ethan

From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Monday, August 2, 2021 1:44 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Ivy A. Wang <iwang@bgrfirm.com>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Hi Ethan,

As of now, yes, but we do not anticipate representing them after this week. Happy to discuss further if necessary.

Thanks,
David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Monday, August 2, 2021 1:30 PM
To: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560

David and Ivy,

It appears that only Ruben Kachian is represented by Margarita Salazar. Does your firm still represent the balance of the defendants?

Thanks,

Ethan

From: Corinne Ubence <cubence@bgrfirm.com>
Sent: Monday, July 26, 2021 5:06 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Natalie Clark <Natalie.Clark@doj.ca.gov>
Cc: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>; Jeanne Arias <jarias@bgrfirm.com>
Subject: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560

Counsel,

Attached please find a fully executed Substitution of Attorney for the above matter.
The document is being filed today.

Regards,

<image002.png>

Corinne Ubence | Legal Assistant to
Carl A. Roth, David Carroll,
Matthew Kussman and Luke Fiedler
801 S. Figueroa Street, Suite 2000
Los Angeles, California 90017
Main 213.725.9800 | Fax 213.725.9808
cubence@bgrfirm.com
www.bgrfirm.com

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Exhibit 7

Ethan Turner

From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Friday, October 15, 2021 11:48 AM
To: Ethan Turner
Cc: Harinder Kapur; Robert White
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

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Ethan – understood, thank you.

David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Friday, October 15, 2021 11:47 AM
To: David J. Carroll <dcarroll@bgrfirm.com>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Robert White <Robert.White@doj.ca.gov>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

David,

I apologize for the delay in responding.

We will agree to a final extension of the due date of your clients' discovery responses to October 25, 2021. There won't be any more extensions.

We understand and sympathize with your situation, however there are effectively only about five months left in which discovery can meaningfully occur before our trial date. There have been repeated extensions granted to your clients and we need to move along in the discovery process.

Thanks,

Ethan Turner
Deputy Attorney General
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



From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Friday, October 15, 2021 11:10 AM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

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Hi Ethan – just wanted to follow up on this. Please let me know if this works. Thanks.

David

From: David J. Carroll
Sent: Wednesday, October 13, 2021 1:26 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Hi Ethan – I'm sure you saw that the Court adopted its tentative ruling on our motions to withdraw. We're still trying to work out the logistics of the substitution of Ms. Salazar for our current clients, but if that doesn't happen I anticipate re-filing our motion to withdraw.

Could I ask for another extension for my clients to respond to Plaintiffs' discovery until 11/1? I should know at that point if we will be proceeding by motion or substitution on our withdrawal.

Thanks,
David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Monday, October 4, 2021 8:50 AM
To: David J. Carroll <dcarroll@bgrfirm.com>
Subject: Re: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Tech issues are the most nerve racking thing about practicing law these days. . . .

I saw an email from Salazar this morning, however I haven't seen a signed substitution for anyone and, frankly, she has not responded to more than one of my emails over the last two months and has missed her discovery deadline for Kachian, so I'm not terribly confident that she'll actually sub in officially.

For this reason, I'll be asking that, as a condition of being relieved as counsel that the physical and mailing addresses of each of the natural person defendants be provided to us because in the even things fall through with her, I'd like to actually be able to contact and serve the defendants.

Is that something you can provide to us?

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: David J. Carroll <dcarroll@bgrfirm.com>

Sent: Monday, October 4, 2021 8:46:38 AM

To: Ethan Turner

Subject: Re: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

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I was getting worried as well!

On Oct 4, 2021, at 8:40 AM, Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

As someone who doesn't use Teams much, this is a reality check:

Are we still waiting for the meeting to begin? Or did I screw up logging in somehow?

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

<OutlookEmoji-159121106287481ea29bf-b875-404c-9f15-29760298a7b6.jpg>

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From: David J. Carroll <dcarroll@bgrfirm.com>

Sent: Wednesday, August 18, 2021 12:33 PM

To: Ethan Turner

Subject: Re: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Thank you.

On Aug 18, 2021, at 12:30 PM, Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

David,

That'll work for us. You can have your extension until October 18.

From: David J. Carroll <dcarroll@bgrfirm.com>

Sent: Tuesday, August 17, 2021 6:10 PM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Ivy A. Wang <iwang@bgrfirm.com>

Cc: Robert White <Robert.White@doj.ca.gov>; Patrick Boyne

<Patrick.Boyne@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>

Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560
[IWOV-DOCSLA.FID365123]

Ethan,

Given our pending motion to withdraw as counsel in this matter for Defendants Vertical Bliss, More Agency, Kushy Punch, Conglomerate Marketing, Arutyun Barsamyan, and Mike Toroyan, and considering the issues giving rise to that motion, would you be amenable to extending the deadline for these Defendants' discovery responses until October 18 (i.e., two weeks after the hearing date on our motion to withdraw)? Please let me know. Thank you.

David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Wednesday, August 4, 2021 11:43 AM
To: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>
Cc: Robert White <Robert.White@doj.ca.gov>; Patrick Boyne <Patrick.Boyne@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560
[IWOV-DOCSLA.FID365123]

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Thanks,

-Ethan

Ethan Turner

Deputy Attorney General

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

<image001.jpg>

From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Tuesday, August 3, 2021 6:49 PM
To: Ethan Turner; Ivy A. Wang
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Ethan,

Could I ask you for another 2-week extension for all defendants (except Ruben Cross) to respond to Plaintiffs' discovery? As you can imagine, the substitutions of counsel going on right now for the various defendants are making it difficult to put responses together right now. Please let me know. Thank you.

David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Monday, August 2, 2021 1:47 PM
To: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Thanks David.

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Thanks,

-Ethan

From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Monday, August 2, 2021 1:44 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Ivy A. Wang <iwang@bgrfirm.com>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Hi Ethan,

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Sent: Monday, August 2, 2021 1:30 PM
To: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560

David and Ivy,

It appears that only Ruben Kachian is represented by Margarita Salazar. Does your firm still represent the balance of the defendants?

Thanks,

Ethan

From: Corinne Ubence <cubence@bgrfirm.com>
Sent: Monday, July 26, 2021 5:06 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Natalie Clark <Natalie.Clark@doj.ca.gov>
Cc: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>; Jeanne Arias <jarias@bgrfirm.com>
Subject: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560

Counsel,

Attached please find a fully executed Substitution of Attorney for the above matter. The document is being filed today.

Regards,

<image002.png>

Corinne Ubence | Legal Assistant to
Carl A. Roth, David Carroll,
Matthew Kussman and Luke Fiedler
801 S. Figueroa Street, Suite 2000

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Exhibit 8

Ethan Turner

From: Ethan Turner
Sent: Tuesday, October 26, 2021 11:26 AM
To: David J. Carroll
Cc: Harinder Kapur; Robert White
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

David,

I should have indicated this earlier, but we are willing to and would prefer to receive discovery responses electronically.

If you mailed them out yesterday, my apologies.

Thanks,

-Ethan

Ethan Turner

Deputy Attorney General
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



From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Friday, October 15, 2021 11:48 AM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>

Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Robert White <Robert.White@doj.ca.gov>

Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

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

Ethan – understood, thank you.

David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>

Sent: Friday, October 15, 2021 11:47 AM

To: David J. Carroll <dcarroll@bgrfirm.com>

Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Robert White <Robert.White@doj.ca.gov>

Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

David,

I apologize for the delay in responding.

We will agree to a final extension of the due date of your clients' discovery responses to October 25, 2021. There won't be any more extensions.

We understand and sympathize with your situation, however there are effectively only about five months left in which discovery can meaningfully occur before our trial date. There have been repeated extensions granted to your clients and we need to move along in the discovery process.

Thanks,

Ethan Turner

Deputy Attorney General

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



From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Friday, October 15, 2021 11:10 AM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

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Hi Ethan – just wanted to follow up on this. Please let me know if this works. Thanks.

David

From: David J. Carroll
Sent: Wednesday, October 13, 2021 1:26 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Hi Ethan – I'm sure you saw that the Court adopted its tentative ruling on our motions to withdraw. We're still trying to work out the logistics of the substitution of Ms. Salazar for our current clients, but if that doesn't happen I anticipate re-filing our motion to withdraw.

Could I ask for another extension for my clients to respond to Plaintiffs' discovery until 11/1? I should know at that point if we will be proceeding by motion or substitution on our withdrawal.

Thanks,
David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Monday, October 4, 2021 8:50 AM
To: David J. Carroll <dcarroll@bgrfirm.com>
Subject: Re: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Tech issues are the most nerve racking thing about practicing law these days. . . .

I saw an email from Salazar this morning, however I haven't seen a signed substitution for anyone and, frankly, she has not responded to more than one of my emails over the last two months and has missed her discovery deadline for Kachian, so I'm not terribly confident that she'll actually sub in officially.

For this reason, I'll be asking that, as a condition of being relieved as counsel that the physical and mailing addresses of each of the natural person defendants be provided to us because in the even things fall through with her, I'd like to actually be able to contact and serve the defendants.

Is that something you can provide to us?

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: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Monday, October 4, 2021 8:46:38 AM
To: Ethan Turner
Subject: Re: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

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I was getting worried as well!

On Oct 4, 2021, at 8:40 AM, Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

As someone who doesn't use Teams much, this is a reality check:

Are we still waiting for the meeting to begin? Or did I screw up logging in somehow?

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

<OutlookEmoji-159121106287481ea29bf-b875-404c-9f15-29760298a7b6.jpg>

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From: David J. Carroll <dcarroll@bgrfirm.com>

Sent: Wednesday, August 18, 2021 12:33 PM

To: Ethan Turner

Subject: Re: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Thank you.

On Aug 18, 2021, at 12:30 PM, Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

David,

That'll work for us. You can have your extension until October 18.

From: David J. Carroll <dcarroll@bgrfirm.com>

Sent: Tuesday, August 17, 2021 6:10 PM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Ivy A. Wang <iwang@bgrfirm.com>

Cc: Robert White <Robert.White@doj.ca.gov>; Patrick Boyne

<Patrick.Boyne@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>

Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Ethan,

Given our pending motion to withdraw as counsel in this matter for Defendants Vertical Bliss, More Agency, Kushy Punch, Conglomerate Marketing, Arutyun Barsamyan, and Mike Toroyan, and considering the issues giving rise to that motion, would you be

amenable to extending the deadline for these Defendants' discovery responses until October 18 (i.e., two weeks after the hearing date on our motion to withdraw)? Please let me know. Thank you.

David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Wednesday, August 4, 2021 11:43 AM
To: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>
Cc: Robert White <Robert.White@doj.ca.gov>; Patrick Boyne <Patrick.Boyne@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

David,

An additional two week extension for your remaining clients is fine with us.

Thanks,

-Ethan

Ethan Turner

Deputy Attorney General

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

<image001.jpg>

From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Tuesday, August 3, 2021 6:49 PM
To: Ethan Turner; Ivy A. Wang
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Ethan,

Could I ask you for another 2-week extension for all defendants (except Ruben Cross) to respond to Plaintiffs' discovery? As you can imagine, the substitutions of counsel going on right now for the various defendants are making it difficult to put responses together right now. Please let me know. Thank you.

David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Monday, August 2, 2021 1:47 PM
To: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Thanks David.

If there is other information that you think would be helpful, further discussion is welcome. Otherwise, I'll just look for those notices as they come in.

Thanks,

-Ethan

From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Monday, August 2, 2021 1:44 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Ivy A. Wang <iwang@bgrfirm.com>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560 [IWOV-DOCSLA.FID365123]

Hi Ethan,

As of now, yes, but we do not anticipate representing them after this week. Happy to discuss further if necessary.

Thanks,
David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Monday, August 2, 2021 1:30 PM
To: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>
Subject: RE: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560

David and Ivy,

It appears that only Ruben Kachian is represented by Margarita Salazar. Does your firm still represent the balance of the defendants?

Thanks,

Ethan

From: Corinne Ubence <cubence@bgrfirm.com>
Sent: Monday, July 26, 2021 5:06 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Natalie Clark <Natalie.Clark@doj.ca.gov>
Cc: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>; Jeanne Arias <jarias@bgrfirm.com>
Subject: Cal Dept of Public Health et al v. Vertical Bliss et al. LASC 20CHCV00560

Counsel,

Attached please find a fully executed Substitution of Attorney for the above matter. The document is being filed today.

Regards,

<image002.png>

Corinne Ubence | Legal Assistant to
Carl A. Roth, David Carroll,
Matthew Kussman and Luke Fiedler
801 S. Figueroa Street, Suite 2000
Los Angeles, California 90017
Main 213.725.9800 | Fax 213.725.9808
cubence@bgrfirm.com
www.bgrfirm.com

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Exhibit 9

1 BROWNE GEORGE ROSS
O'BRIEN ANNAGUEY & ELLIS LLP
2 Ivy A. Wang (State Bar No. 224899)
iwang@bgrfirm.com
3 David J. Carroll (State Bar No. 291665)
dcarroll@bgrfirm.com
4 801 S. Figueroa Street, Suite 2000
Los Angeles, California 90017
5 Telephone: (213) 725-9800
Facsimile: (213) 725-9808
6

Attorneys for Defendants
7 Vertical Bliss, Inc., Kushy Punch, Inc.,
Conglomerate Marketing LLC, More Agency,
8 Inc., Arutyun Barsamyan, and Mike A. Toroyan

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11
12 CALIFORNIA DEPARTMENT OF PUBLIC
HEALTH; and BUREAU OF CANNABIS
13 CONTROL,

14 Plaintiffs,

15 vs.

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

20 Defendants.
21
22
23
24
25
26
27
28

Case No. 20CHCV00560

Assigned for All Purposes to:
Hon. Stephen Pfahler

**DEFENDANT MORE AGENCY, INC.'S
RESPONSES TO PLAINTIFF
CALIFORNIA DEPARTMENT OF
PUBLIC HEALTH'S FORM
INTERROGATORIES - GENERAL, SET
ONE**

Judge: Hon. Stephen Pfahler

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

1 PROPOUNDING PARTY: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

2 RESPONDING PARTY: MORE AGENCY, INC.

3 SET NO.: ONE

4 Pursuant to California Code of Civil Procedure Section 2030.210, *et seq*, Defendant
5 MORE AGENCY, INC., (“Responding Party” or “More Agency”), hereby responds to Plaintiff
6 CALIFORNIA DEPARTMENT OF PUBLIC HEALTH’S (“Plaintiff”) Form Interrogatories -
7 General, Set One, as follows:

8 **PRELIMINARY STATEMENT**

9 Responding Party has not yet completed investigation of the facts or law relating to this
10 case, has not yet completed discovery in this action, and has not begun preparations for trial. The
11 following responses are given without prejudice to Responding Party’s rights to produce at the
12 time of trial or beforehand, subsequently discovered evidence or evidence relating to proof of facts
13 later discovered to be material.

14 Counsel for Responding Party recently filed a motion to withdraw, and will be filing a
15 subsequent motion to withdraw as counsel of record in this action for Responding Party. Counsel
16 has not obtained any substantive answers for each Interrogatory, and consequently, no substantive
17 responsive can be served at this time. Responding Party reserves the right to supplement, clarify,
18 revise, or correct any or all responses to these requests, and may assert additional objections or
19 privileges, in one or more subsequent supplemental response(s).

20 **GENERAL OBJECTIONS**

21 Each and every Interrogatory hereto is subject to the objections set forth below, which are
22 incorporated herein by reference. These objections form a part of the response to each and every
23 Interrogatory, and subparts therein, and are set forth here to avoid duplication and repetition by
24 restating them in response to each Interrogatory. These general objections may specifically be
25 interposed for the purpose of clarity in response to any particular Interrogatory.

26 Responding Party objects to the Interrogatory to the extent it is unduly burdensome,
27 oppressive, harassing, and/or seeks information that is neither relevant nor reasonably calculated
28 to lead to the discovery of admissible evidence.

1 Responding Party objects to the Interrogatory to the extent it is inconsistent with and/or
2 requires more from Responding Party than is required by the California Rules of Civil Procedure
3 and all applicable local rules. To the extent Responding Party furnishes responses and/or
4 documents in response to an Interrogatory, it does so subject to and without waiving this
5 objection.

6 Responding Party objects to the Interrogatory to the extent it seeks information and/or
7 documents that are privileged under the attorney-client privilege, the work product doctrine, the
8 joint-defense privilege/doctrine or other applicable privileges or are otherwise protected from
9 disclosure.

10 Responding Party objects to the Interrogatory to the extent that it seeks information or
11 documents that are not within Responding Party's possession, custody or control and/or is
12 uniquely within the knowledge of Plaintiff or third parties.

13 Responding Party objects to the Interrogatory to the extent it calls for legal conclusions,
14 and/or to the extent it assumes disputed issues or is phrased in such a way as to be lacking
15 foundation, argumentative, prejudicial or otherwise improper.

16 Responding Party objects to the Interrogatory to the extent it seeks information or
17 documents the production of which without appropriate safeguards would violate privacy rights
18 protected by California privacy laws, the privacy laws of any state from which information or
19 documents are sought, the privacy obligations of the Gramm-Leach-Bliley Act or other federal
20 laws, confidentiality agreements, arrangements or understandings between or among Responding
21 Party and other persons, the confidentiality of settlement discussions or agreements, court or
22 agency orders, or regulations or procedures restricting or prohibiting the disclosure of particular
23 information or documents.

24 Responding Party objects to the Interrogatory to the extent it seeks the disclosure of
25 documents or information that constitutes confidential, trade secret, proprietary, financial or
26 otherwise protected business or commercial information.

27
28

1 Responding Party objects to the Interrogatory to the extent it is overbroad and unduly
2 burdensome, unlimited in scope and time, or seeks information prior to or beyond a relevant time
3 period.

4 Responding Party objects to the Interrogatory to the extent it is vague, ambiguous, and/or
5 contains words or phrases that are confusing or lack sufficient definition to permit response in the
6 context of the facts of this case.

7 By responding to any part of the Interrogatory or producing any documents or information
8 in connection with its response, Responding Party does not waive, and expressly reserves the
9 objections set forth herein, and does not concede the relevancy or admissibility of the information
10 or documents in this action. Responding Party expressly incorporates the General Objections into
11 its responses to each individual interrogatory.

12 Subject to and without waiving any of the foregoing General Objections, each of which is
13 incorporated by reference into each of the following responses as though set forth in full therein,
14 Responding Party responds as follows:

15 **RESPONSE TO FORM INTERROGATORIES**

16 **INTERROGATORY NO. 1.1:**

17 State the name, **ADDRESS**, telephone number, and relationship to you of each **PERSON**
18 who prepared or assisted in the preparation of the responses to these interrogatories. (*Do not*
19 *identify anyone who simply typed or reproduced the responses.*)

20 **RESPONSE TO INTERROGATORY NO. 1.1:**

21 Responding Party objects to this request on the following grounds: (1) it is overbroad,
22 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
23 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
24 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
25 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
26 given the broad scope of the request.

27 **FORM INTERROGATORY NO. 3.1:**

28 Are you a corporation? If so, state:

- 1 (a) the name stated in the current articles of incorporation;
- 2 (b) all other names used by the corporation during the past 10 years and the dates each
- 3 was used;
- 4 (c) the date and place of incorporation;
- 5 (d) the **ADDRESS** of the principal place of business; and
- 6 (e) whether you are qualified to do business in California.

7 **RESPONSE TO FORM INTERROGATORY NO. 3.1:**

8 Responding Party objects to this request on the following grounds: (1) it is overbroad,
9 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
10 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
11 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
12 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
13 given the broad scope of the request.

14 **FORM INTERROGATORY NO. 3.2:**

15 Are you a partnership? If so, state:

- 16 (a) the current partnership name;
- 17 (b) all other names used by the partnership during the past 10 years and the dates each
- 18 was used;
- 19 (c) whether you are a limited partnership and if so, under the laws of what jurisdiction;
- 20 (d) the name and **ADDRESS** of each general partner; and
- 21 (e) the **ADDRESS** of the principal place of business.

22 **RESPONSE TO FORM INTERROGATORY NO. 3.2:**

23 Responding Party objects to this request on the following grounds: (1) it is overbroad,
24 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
25 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
26 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
27 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
28 given the broad scope of the request.

1 **FORM INTERROGATORY NO. 3.3:**

2 Are you a limited liability company? If so, state:

- 3 (a) the name stated in the current articles of organization;
- 4 (b) all other names used by the company during the past 10 years and the dates each
- 5 was used;
- 6 (c) the date and place of filing of the articles of organization;
- 7 (d) the **ADDRESS** of the principal place of business; and
- 8 (e) whether you are qualified to do business in California.

9 **RESPONSE TO FORM INTERROGATORY NO. 3.3:**

10 Responding Party objects to this request on the following grounds: (1) it is overbroad,

11 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence

12 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and

13 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and

14 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

15 given the broad scope of the request.

16 **FORM INTERROGATORY NO. 3.4:**

17 Are you a joint venture? If so, state:

- 18 (a) the current joint venture name;
- 19 (b) all other names used by the joint venture during the past 10 years and the dates
- 20 each was used;
- 21 (c) the name and **ADDRESS** of each joint venture; and
- 22 (d) the **ADDRESS** of the principal place of business.

23 **RESPONSE TO FORM INTERROGATORY NO. 3.4:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,

25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence

26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and

27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and

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1 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
2 given the broad scope of the request.

3 **FORM INTERROGATORY NO. 3.5:**

4 Are you an unincorporated association? If so, state:

5 (a) the current unincorporated association name;

6 (b) all other names used by the unincorporated association during the past 10 years and
7 the dates each was used;

8 (c) the ADDRESS of the principal place of business.

9 **RESPONSE TO FORM INTERROGATORY NO. 3.5:**

10 Responding Party objects to this request on the following grounds: (1) it is overbroad,
11 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
12 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
13 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
14 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
15 given the broad scope of the request.

16 **FORM INTERROGATORY NO. 3.6:**

17 Have you done business under a fictitious name during the past 10 years? If so, for each
18 fictitious name state:

19 (a) the name;

20 (b) the dates each was used;

21 (c) the state and county of each fictitious name filing; and

22 (d) the ADDRESS of the principal place of business.

23 **RESPONSE TO FORM INTERROGATORY NO. 3.6:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28

1 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
2 given the broad scope of the request.

3 **FORM INTERROGATORY NO. 3.7:**

4 Within the past five years has any public entity registered or licensed your business? If so,
5 for each license or registration:

- 6 (a) identify the license or registration;
- 7 (b) state the name of the public entity; and
- 8 (c) state the dates of issuance and expiration.

9 **RESPONSE TO FORM INTERROGATORY NO. 3.7:**

10 Responding Party objects to this request on the following grounds: (1) it is overbroad,
11 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
12 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
13 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
14 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
15 given the broad scope of the request.

16 **INTERROGATORY NO. 4.1:**

17 At the time of the **INCIDENT**, was there in effect any policy of insurance through which
18 you were or might be insured in any manner (for example, primary, pro-rata, or excess liability
19 coverage or medical expense coverage) for the damages, claims, or actions that have arisen out of
20 the **INCIDENT**? If so, for each policy state:

- 21 (a) the kind of coverage;
- 22 (b) the name and **ADDRESS** of the insurance company;
- 23 (c) the name, **ADDRESS**, and telephone number of each named insured;
- 24 (d) the policy number;
- 25 (e) the limits of coverage for each type of coverage contained in the policy;
- 26 (f) whether any reservation of rights or controversy or coverage dispute exists between
27 you and the insurance company; and
- 28 (g) the name, **ADDRESS**, and telephone number of the custodian of the policy.

1 **RESPONSE TO INTERROGATORY NO. 4.1:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **INTERROGATORY NO. 4.2:**

9 Are you self-insured under any statute for the damages, claims, or actions that have arisen
10 out of the **INCIDENT**? If so, specify the statute.

11 **RESPONSE TO INTERROGATORY NO. 4.2:**

12 Responding Party objects to this request on the following grounds: (1) it is overbroad,
13 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
14 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
15 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
16 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
17 given the broad scope of the request.

18 **INTERROGATORY NO. 15.1:**

19 Identify each denial of a material allegation and each special or affirmative defense in your
20 pleadings and for each:

- 21 (a) state all facts upon which you base the denial or special or affirmative defense;
22 (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have
23 knowledge of those facts; and
24 (d) identify all **DOCUMENTS** and other tangible things that support your denial or
25 special or affirmative, and state the name, **ADDRESS**, and telephone number of the **PERSON**
26 who has each **DOCUMENT**.

1 **RESPONSE TO INTERROGATORY NO. 15.1:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **INTERROGATORY NO. 17.1:**

9 Is your response to each request for admission served with these interrogatories an
10 unqualified admission? If not, for each response that is not an unqualified admission:

- 11 (a) state the number of the request;
- 12 (b) state all facts upon which you base your response;
- 13 (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have
14 knowledge of those facts; and
- 15 (d) identify all **DOCUMENTS** and other tangible things that support your response
16 and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each
17 **DOCUMENT** or thing.

18 **RESPONSE TO INTERROGATORY NO. 17.1:**

19 Responding Party objects to this request on the following grounds: (1) it is overbroad,
20 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
21 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
22 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
23 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
24 given the broad scope of the request.

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1 DATED: November 1, 2021

Respectfully submitted,

2 BROWNE GEORGE ROSS
3 O'BRIEN ANNAGUEY & ELLIS LLP

Ivy A. Wang

4 David J. Carroll

5
6 By: /s/ David J. Carroll

7 David J. Carroll

8 Attorneys for Defendants Vertical Bliss, Inc., Kushy
9 Punch, Inc., Conglomerate Marketing LLC, More
10 Agency, Inc., Arutyun Barsamyan, and Mike A.
11 Toroyan
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Exhibit 10

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8 Inc., Arutyun Barsamyan, and Mike A. Toroyan

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11
12 CALIFORNIA DEPARTMENT OF PUBLIC
HEALTH; and BUREAU OF CANNABIS
13 CONTROL,

14 Plaintiffs,

15 vs.

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

20 Defendants.
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Case No. 20CHCV00560

Assigned for All Purposes to:
Hon. Stephen Pfahler

**DEFENDANT MORE AGENCY, INC.'S
RESPONSES TO PLAINTIFF'S
REQUEST FOR PRODUCTION OF
DOCUMENTS, SET ONE**

Judge: Hon. Stephen Pfahler

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

1 PROPOUNDING PARTY: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

2 RESPONDING PARTY: MORE AGENCY, INC.

3 SET NO.: ONE

4 **PRELIMINARY STATEMENT**

5 1. Responding Party's investigation and development of all facts and circumstances
6 relating to this action is ongoing. These responses and objections are made without prejudice to,
7 and are not a waiver of, Responding Party's right to rely on other facts or documents at trial.

8 2. By making the accompanying responses and objections to Propounding Party's
9 requests, Responding Party does not waive, and hereby expressly reserves, its right to assert any
10 and all objections as to the admissibility of such responses into evidence in this action, or in any
11 other proceedings, on any and all grounds including, but not limited to, competency, relevancy,
12 materiality, and privilege. Further, Responding Party makes the responses and objections herein
13 without in any way implying that it considers the requests, and responses thereto, to be relevant or
14 material to the subject matter of this action.

15 3. Responding Party expressly reserves the right to supplement, clarify, revise, or
16 correct any or all of the responses and objections herein, and to assert additional objections or
17 privileges, in one or more subsequent supplemental response(s).

18 4. Counsel for Responding Party recently filed a motion to withdraw, and will be
19 filing a subsequent motion to withdraw as counsel of record in this action for Responding Party.
20 Counsel has not obtained any responsive documents to these RFPs, and consequently, no
21 responsive documents can be produced at this time. Responding Party reserves the right to
22 supplement, clarify, revise, or correct any or all responses to these requests, and may assert
23 additional objections or privileges, in one or more subsequent supplemental response(s).

24 **GENERAL OBJECTIONS**

25 1. Responding Party objects to each instruction, definition, document request, and
26 interrogatory to the extent that it purports to impose any requirement or discovery obligation
27 greater than or different from those under the Federal Rules of Civil Procedure and the applicable
28 Rules and Orders of the Court.

1 2. Responding Party objects to each instruction, definition, and request to the extent
2 that it seeks information protected from disclosure by the attorney-client privilege, attorney work
3 product doctrine, or any other applicable privilege. Should any such disclosure by Responding
4 Party occur, it is inadvertent and shall not constitute a waiver of any privilege.

5 3. Responding Party objects to each instruction, definition, and request as overbroad
6 and unduly burdensome to the extent it seeks information that is readily or more accessible to
7 Propounding Party from Propounding Party's own files; from documents or information in
8 Propounding Party's possession, custody, or control; or from documents or information that
9 Propounding Party previously produced to Responding Party. Responding to such interrogatory
10 would be oppressive, unduly burdensome, and unnecessarily expensive, and the burden of
11 responding to such requests and interrogatory is substantially the same or less for Propounding
12 Party as for Responding Party. This objection encompasses, but is not limited to, documents and
13 answers to interrogatories previously produced by Propounding Party to Responding Party in this
14 action, all correspondence between the Responding Party and Propounding Party, all other
15 information provided by Propounding Party to Responding Party, and all information produced by
16 Responding Party to Propounding Party in response to discovery requests of Propounding Party.
17 All such information will not be produced.

18 4. To the extent any of Propounding Party's requests seek answers that include expert
19 material, Responding Party objects to any such requests as premature and expressly reserves the
20 right to supplement, clarify, revise, or correct any or all responses to such requests, and to assert
21 additional objections or privileges, in one or more subsequent supplemental response(s) in
22 accordance with the time period for exchanging expert reports set by the Court.

23 **OBJECTIONS AND RESPONSES TO REQUESTS FOR PRODUCTION**

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

25 Please produce all DOCUMENTS reflecting any and all still pictures, moving pictures,
26 Photographs, digital images, videos, or any other photographic representation which identify the
27 interior of the PREMISES in the period from April 23, 2018 to October 2, 2019.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

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

9 Please produce all DOCUMENTS reflecting any and all still pictures, moving pictures,
10 photographs, digital images, videos, or any other photographic representation which identify the
11 exterior of the PREMISES in the period from April 23, 2018 to October 2, 2019.

12 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

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

20 Please produce all leases pertaining to the PREMISES within the last 5 years.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
27 given the broad scope of the request.
28

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

2 Please produce all DOCUMENTS reflecting any rental payments made for the PREMISES
3 within the last 5 years.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 4:**

5 Responding Party objects to this request on the following grounds: (1) it is overbroad,
6 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
7 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
8 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
9 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
10 given the broad scope of the request.

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

12 Please produce all DOCUMENTS reflecting the purchase of the PREMISES within the
13 last 5 years.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

15 Responding Party objects to this request on the following grounds: (1) it is overbroad,
16 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
17 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
18 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
19 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
20 given the broad scope of the request.

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

22 Please produce all DOCUMENTS reflecting the sale of the PREMISES within the last 5
23 years.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

25 Responding Party objects to this request on the following grounds: (1) it is overbroad,
26 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
27 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
28 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and

1 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
2 given the broad scope of the request.

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

4 Please produce any and all income and expense statements arising from any business
5 activity at the PREMISES from 2018 through the present date.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

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

14 Please produce any and all asset and liability statements arising from any business activity
15 at the PREMISES from 2018 through the present date.

16 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

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

24 Please produce any and all balance sheets arising from any business activity at the
25 PREMISES from 2018 through the present date.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. 9:**

27 Responding Party objects to this request on the following grounds: (1) it is overbroad,
28 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence

1 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
2 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
3 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
4 given the broad scope of the request.

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

6 Please produce any and all sources and uses of cash statements arising from any business
7 activity at the PREMISES from 2018 through the present date.

8 **RESPONSE TO REQUEST FOR PRODUCTION NO. 10:**

9 Responding Party objects to this request on the following grounds: (1) it is overbroad,
10 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
11 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
12 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
13 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
14 given the broad scope of the request.

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

16 Please produce any and all sources and uses of funds statements arising from any business
17 activity at the PREMISES from 2018 through the present date.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. 11:**

19 Responding Party objects to this request on the following grounds: (1) it is overbroad,
20 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
21 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
22 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
23 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
24 given the broad scope of the request.

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

26 Please produce any and all statements of accounts payable arising from any business
27 activity at the PREMISES from 2018 through the present date.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 12:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

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

9 Please produce any and all statements of accounts receivable arising from any business
10 activity at the PREMISES from 2018 through the present date.

11 **RESPONSE TO REQUEST FOR PRODUCTION NO. 13:**

12 Responding Party objects to this request on the following grounds: (1) it is overbroad,
13 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
14 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
15 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
16 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
17 given the broad scope of the request.

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

19 Please produce any and all equipment leases arising from any business activity at the
20 PREMISES from 2018 through the present date.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 14:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
27 given the broad scope of the request.
28

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

2 Please produce any and all equipment purchase DOCUMENTS arising from any business
3 activity at the PREMISES from 2018 through the present date.

4 **RESPONSE TO REQUEST FOR PRODUCTION NO. 15:**

5 Responding Party objects to this request on the following grounds: (1) it is overbroad,
6 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
7 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
8 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
9 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
10 given the broad scope of the request.

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

12 Please produce any and all DOCUMENTS reflecting the sale of CANNABIS and
13 CANNABIS PRODUCT(S) from the PREMISES from 2018 through the present date.

14 **RESPONSE TO REQUEST FOR PRODUCTION NO. 16:**

15 Responding Party objects to this request on the following grounds: (1) it is overbroad,
16 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
17 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
18 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
19 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
20 given the broad scope of the request.

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

22 Please produce any and all DOCUMENTS reflecting the purchase of CANNABIS and
23 CANNABIS PRODUCT(S) from the PREMISES from 2018 through the present date.

24 **RESPONSE TO REQUEST FOR PRODUCTION NO. 17:**

25 Responding Party objects to this request on the following grounds: (1) it is overbroad,
26 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
27 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
28 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and

1 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
2 given the broad scope of the request.

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

4 Please produce any and all DOCUMENTS reflecting the receipt of CANNABIS and
5 CANNABIS PRODUCT(S) at the PREMISES from 2018 through the present date.

6 **RESPONSE TO REQUEST FOR PRODUCTION NO. 18:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

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

14 Please produce any and all DOCUMENTS reflecting any GROSS REVENUE from the
15 MANUFACTURING of CANNABIS and CANNABIS PRODUCT(S) from the PREMISES from
16 2018 through the present date.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. 19:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

24 **REQUEST FOR PRODUCTION NO. 20:**

25 Please produce any and all DOCUMENTS reflecting any GROSS REVENUE from the
26 DISTRIBUTION of CANNABIS and CANNABIS PRODUCT(S) to, from, or at the PREMISES
27 from 2018 through the present date.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 20:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR PRODUCTION NO. 21:**

9 Please produce YOUR articles of incorporation, including statements of information.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 21:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

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

18 Please produce YOUR articles of organization, including statements of information.

19 **RESPONSE TO REQUEST FOR PRODUCTION NO. 22:**

20 Responding Party objects to this request on the following grounds: (1) it is overbroad,
21 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
22 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
23 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
24 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
25 given the broad scope of the request.

26 **REQUEST FOR PRODUCTION NO. 23:**

27 Please produce any and all DOCUMENTS related to any purchase, sale, or transfer of any
28 right to use or authorization to use the Kushy Punch name, logo, or proprietary or patented recipes,

formulas, or ingredients used in MANUFACTURING CANNABIS PRODUCTS.

RESPONSE TO REQUEST FOR PRODUCTION NO. 23:

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.

DATED: November 1, 2021

Respectfully submitted,

BROWNE GEORGE ROSS
O'BRIEN ANNAGUEY & ELLIS LLP
Ivy A. Wang
David J. Carroll

By: /s/ David J. Carroll
David J. Carroll

Attorneys for Defendants Vertical Bliss, Inc., Kushy Punch, Inc., Conglomerate Marketing LLC, More Agency, Inc., Arutyun Barsamyan, and Mike A. Toroyan

Exhibit 11

1 BROWNE GEORGE ROSS
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7 Vertical Bliss, Inc., Kushy Punch, Inc.,
Conglomerate Marketing LLC, More Agency,
8 Inc., Arutyun Barsamyan, and Mike A. Toroyan

9 SUPERIOR COURT OF THE STATE OF CALIFORNIA

10 COUNTY OF LOS ANGELES

11
12 CALIFORNIA DEPARTMENT OF PUBLIC
HEALTH; and BUREAU OF CANNABIS
13 CONTROL,

14 Plaintiffs,

15 vs.

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

20 Defendants.
21
22
23
24
25
26
27
28

Case No. 20CHCV00560

Assigned for All Purposes to:
Hon. Stephen Pfahler

**DEFENDANT MORE AGENCY, INC.'S
RESPONSES TO PLAINTIFF'S
REQUESTS FOR ADMISSION, SET ONE**

Judge: Hon. Stephen Pfahler

Action Filed: September 23, 2020

Trial Date: June 13, 2022

1 PROPOUNDING PARTY: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH

2 RESPONDING PARTY: MORE AGENCY, INC.

3 SET NO.: ONE

4 **PRELIMINARY STATEMENT**

5 1. Responding Party's investigation and development of all facts and circumstances
6 relating to this action is ongoing. These responses and objections are made without prejudice to,
7 and are not a waiver of, Responding Party's right to rely on other facts or documents at trial.

8 2. By making the accompanying responses and objections to Propounding Party's
9 requests for admissions, Responding Party does not waive, and hereby expressly reserves, its right
10 to assert any and all objections as to the admissibility of such responses into evidence in this
11 action, or in any other proceedings, on any and all grounds including, but not limited to,
12 competency, relevancy, materiality, and privilege. Further, Responding Party makes the responses
13 and objections herein without in any way implying that it considers the requests for admissions,
14 and responses thereto, to be relevant or material to the subject matter of this action.

15 3. Responding Party expressly reserves the right to supplement, clarify, revise, or
16 correct any or all of the responses and objections herein, and to assert additional objections or
17 privileges, in one or more subsequent supplemental response(s).

18 4. Counsel for Responding Party recently filed a motion to withdraw, and will be
19 filing a subsequent motion to withdraw as counsel of record in this action for Responding Party.
20 Counsel has not obtained any substantive answers to these RFAs, and consequently, no
21 substantive responses can be produced at this time. Responding Party reserves the right to
22 supplement, clarify, revise, or correct any or all responses to these requests, and may assert
23 additional objections or privileges, in one or more subsequent supplemental response(s).

24 **GENERAL OBJECTIONS**

25 1. Responding Party objects to each instruction, definition, document request, and
26 request for admission to the extent that it purports to impose any requirement or discovery
27 obligation greater than or different from those under the Federal Rules of Civil Procedure and the
28 applicable Rules and Orders of the Court.

1 2. Responding Party objects to each instruction, definition, and request for admission
2 to the extent that it seeks information protected from disclosure by the attorney-client privilege,
3 attorney work product doctrine, or any other applicable privilege. Should any such disclosure by
4 Responding Party occur, it is inadvertent and shall not constitute a waiver of any privilege.

5 3. Responding Party objects to each instruction, definition, and request for admission
6 as overbroad and unduly burdensome to the extent it seeks information that is readily or more
7 accessible to Propounding Party from Propounding Party's own files; from documents or
8 information in Propounding Party's possession, custody, or control; or from documents or
9 information that Propounding Party previously produced to Responding Party. Responding to
10 such request for admission would be oppressive, unduly burdensome, and unnecessarily
11 expensive, and the burden of responding to such requests and interrogatory is substantially the
12 same or less for Propounding Party as for Responding Party. This objection encompasses, but is
13 not limited to, documents and answers to discovery previously produced by Propounding Party to
14 Responding Party in this action, all correspondence between the Responding Party and
15 Propounding Party, all other information provided by Propounding Party to Responding Party, and
16 all information produced by Responding Party to Propounding Party in response to discovery
17 requests of Propounding Party. All such information will not be produced.

18 4. To the extent any of Propounding Party's requests for admissions seek answers that
19 include expert material, Responding Party objects to any such interrogatory as premature and
20 expressly reserves the right to supplement, clarify, revise, or correct any or all responses to such
21 requests, and to assert additional objections or privileges, in one or more subsequent supplemental
22 response(s) in accordance with the time period for exchanging expert reports set by the Court.

23 **OBJECTIONS AND RESPONSES TO REQUESTS FOR ADMISSIONS**

24 **REQUEST FOR ADMISSION NO. 1:**

25 Admit that YOU owned the PREMISES in the period from April 23, 2018 to October 2,
26 2019.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 1:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

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

7 Admit that YOU leased the PREMISES in the period from April 23, 2018 to October 2,
8 2019.

9 **RESPONSE TO REQUEST FOR ADMISSION NO. 2:**

10 Responding Party objects to this request on the following grounds: (1) it is overbroad,
11 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
12 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
13 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
14 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
15 given the broad scope of the request.

16 **REQUEST FOR ADMISSION NO. 3:**

17 Admit that YOU operated a business at the PREMISES in the period from April 23, 2018
18 to October 2, 2019.

19 **RESPONSE TO REQUEST FOR ADMISSION NO. 3:**

20 Responding Party objects to this request on the following grounds: (1) it is overbroad,
21 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
22 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
23 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
24 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
25 given the broad scope of the request.

26 **REQUEST FOR ADMISSION NO. 4:**

27 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
28 COMMERCIAL MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period

1 from April 23, 2018 to October 2, 2019.

2 **RESPONSE TO REQUEST FOR ADMISSION NO. 4:**

3 Responding Party objects to this request on the following grounds: (1) it is overbroad,
4 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
5 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
6 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
7 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
8 given the broad scope of the request.

9 **REQUEST FOR ADMISSION NO. 5:**

10 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
11 ACTIVITY at the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 5:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

19 **REQUEST FOR ADMISSION NO. 6:**

20 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
21 ACTIVITY at the PREMISES, on at least 50 separate days, at some point in the period from April
22 23, 2018 to October 2, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 6:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 7:**

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES, on at least 100 separate days, at some point in the period from
5 April 23, 2018 to October 2, 2019.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 7:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

13 **REQUEST FOR ADMISSION NO. 8:**

14 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
15 ACTIVITY at the PREMISES, on at least 200 separate days, at some point in the period from
16 April 23, 2018 to October 2, 2019.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 8:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

24 **REQUEST FOR ADMISSION NO. 9:**

25 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
26 ACTIVITY at the PREMISES, on at least 300 separate days, at some point in the period from
27 April 23, 2018 to October 2, 2019.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 9:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 10:**

9 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
10 ACTIVITY at the PREMISES, on at least 400 separate days, at some point in the period from
11 April 23, 2018 to October 2, 2019.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 10:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

19 **REQUEST FOR ADMISSION NO. 11:**

20 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
21 ACTIVITY at the PREMISES, on at least 500 separate days, at some point in the period from
22 April 23, 2018 to October 2, 2019.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 11:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 12:**

3 Admit that YOU engaged in COMMERCIAL MANUFACTURING CANNABIS
4 ACTIVITY at the PREMISES, on at least 527 separate days, at some point in the period from
5 April 23, 2018 to October 2, 2019.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 12:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

13 **REQUEST FOR ADMISSION NO. 13:**

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
16 2018 to April 22, 2019 exceeded \$100,001.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 13:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

24 **REQUEST FOR ADMISSION NO. 14:**

25 Admit that the GROSS REVENUE YOU received from COMMERCIAL
26 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
27 2018 to April 22, 2019 exceeded \$500,001.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 14:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 15:**

9 Admit that the GROSS REVENUE YOU received from COMMERCIAL
10 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
11 2018 to April 22, 2019 exceeded \$1,500,001.

12 **RESPONSE TO REQUEST FOR ADMISSION NO. 15:**

13 Responding Party objects to this request on the following grounds: (1) it is overbroad,
14 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
15 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
16 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
17 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
18 given the broad scope of the request.

19 **REQUEST FOR ADMISSION NO. 16:**

20 Admit that the GROSS REVENUE YOU received from COMMERCIAL
21 MANUFACTURING CANNABIS ACTIVITY at the PREMISES from April 23, 2018 to April
22 22, 2019 exceeded \$3,000,001.

23 **RESPONSE TO REQUEST FOR ADMISSION NO. 16:**

24 Responding Party objects to this request on the following grounds: (1) it is overbroad,
25 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
26 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
27 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
28 evidence protected from disclosure by other privileges or doctrines that are not readily apparent

1 given the broad scope of the request.

2 **REQUEST FOR ADMISSION NO. 17:**

3 Admit that the GROSS REVENUE YOU received from COMMERCIAL
4 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
5 2018 to April 22, 2019 exceeded \$5,000,001.

6 **RESPONSE TO REQUEST FOR ADMISSION NO. 17:**

7 Responding Party objects to this request on the following grounds: (1) it is overbroad,
8 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
9 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
10 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
11 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
12 given the broad scope of the request.

13 **REQUEST FOR ADMISSION NO. 18:**

14 Admit that the GROSS REVENUE YOU received from COMMERCIAL
15 MANUFACTURING CANNABIS ACTIVITY at the PREMISES in the period from April 23,
16 2018 to April 22, 2019 exceeded \$10,000,000.

17 **RESPONSE TO REQUEST FOR ADMISSION NO. 18:**

18 Responding Party objects to this request on the following grounds: (1) it is overbroad,
19 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
20 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
21 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
22 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
23 given the broad scope of the request.

24 **REQUEST FOR ADMISSION NO. 19:**

25 Admit that YOU did not have a COMMERCIAL CANNABIS LICENSE to engage in
26 COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY at, to, or from the PREMISES in the
27 period from April 23, 2018 to October 2, 2019.

1 **RESPONSE TO REQUEST FOR ADMISSION NO. 19:**

2 Responding Party objects to this request on the following grounds: (1) it is overbroad,
3 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
4 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
5 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
6 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
7 given the broad scope of the request.

8 **REQUEST FOR ADMISSION NO. 20:**

9 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
10 at, to, or from the PREMISES at some point in the period from April 23, 2018 to October 2, 2019.

11 **RESPONSE TO REQUEST FOR ADMISSION NO. 20:**

12 Responding Party objects to this request on the following grounds: (1) it is overbroad,
13 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
14 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
15 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
16 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
17 given the broad scope of the request.

18 **REQUEST FOR ADMISSION NO. 21:**

19 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
20 at, to, or from the PREMISES, on at least 50 separate days, in the period from April 23, 2018 to
21 October 2, 2019.

22 **RESPONSE TO REQUEST FOR ADMISSION NO. 21:**

23 Responding Party objects to this request on the following grounds: (1) it is overbroad,
24 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
25 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
26 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
27 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
28 given the broad scope of the request.

1 **REQUEST FOR ADMISSION NO. 22:**

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from PREMISES, on at least 100 separate days, in the period from April 23, 2018 to
4 October 2, 2019.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 22:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 23:**

13 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
14 at, to, or from the PREMISES, on at least 200 separate days, in the period from April 23, 2018 to
15 October 2, 2019.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 23:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 24:**

24 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
25 at, to, or from the PREMISES, on at least 300 separate days, in the period from April 23, 2018 to
26 October 2, 2019.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 24:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 25:**

7 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
8 at, to, or from the PREMISES, on at least 400 separate days, in the period from April 23, 2018 to
9 October 2, 2019.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 25:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17 **REQUEST FOR ADMISSION NO. 26:**

18 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
19 at, to, or from the PREMISES, on at least 500 separate days, in the period from April 23, 2018 to
20 October 2, 2019.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 26:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
27 given the broad scope of the request.
28

1 **REQUEST FOR ADMISSION NO. 27:**

2 Admit that YOU engaged in COMMERCIAL DISTRIBUTOR CANNABIS ACTIVITY
3 at, to, or from the PREMISES, on 527 separate days, in the period from April 23, 2018 to October
4 2, 2019.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 27:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 28:**

13 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
14 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
15 22, 2019 was more than \$1,000,000.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 28:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 29:**

24 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
25 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
26 22, 2019 was more than \$2,500,000.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 29:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 30:**

7 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
8 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
9 22, 2019 was more than \$5,000,000.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 30:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17 **REQUEST FOR ADMISSION NO. 31:**

18 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
19 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
20 22, 2019 was more than \$10,000,000.

21 **RESPONSE TO REQUEST FOR ADMISSION NO. 31:**

22 Responding Party objects to this request on the following grounds: (1) it is overbroad,
23 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
24 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
25 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
26 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
27 given the broad scope of the request.
28

1 **REQUEST FOR ADMISSION NO. 32:**

2 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
3 CANNABIS ACTIVITY at, to, or from the PREMISES in the period from April 23, 2018 to April
4 22, 2019 was more than \$20,000,000.

5 **RESPONSE TO REQUEST FOR ADMISSION NO. 32:**

6 Responding Party objects to this request on the following grounds: (1) it is overbroad,
7 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
8 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
9 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
10 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
11 given the broad scope of the request.

12 **REQUEST FOR ADMISSION NO. 33:**

13 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
14 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
15 was more than \$30,000,000.

16 **RESPONSE TO REQUEST FOR ADMISSION NO. 33:**

17 Responding Party objects to this request on the following grounds: (1) it is overbroad,
18 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
19 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
20 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
21 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
22 given the broad scope of the request.

23 **REQUEST FOR ADMISSION NO. 34:**

24 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
25 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
26 was more than \$50,000,000.

27 **RESPONSE TO REQUEST FOR ADMISSION NO. 34:**

28 Responding Party objects to this request on the following grounds: (1) it is overbroad,

1 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
2 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
3 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
4 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
5 given the broad scope of the request.

6 **REQUEST FOR ADMISSION NO. 35:**

7 Admit that the GROSS REVENUE YOU received from COMMERCIAL DISTRIBUTOR
8 CANNABIS ACTIVITY at the PREMISES in the period from April 23, 2018 to April 22, 2019
9 was more than \$70,000,000.

10 **RESPONSE TO REQUEST FOR ADMISSION NO. 35:**

11 Responding Party objects to this request on the following grounds: (1) it is overbroad,
12 unduly burdensome, and lacks reasonable particularity; (2) it may seek documents and evidence
13 protected from disclosure by the attorney work product doctrine; (3) it may seek documents and
14 evidence protected from disclosure by the attorney-client privilege; (4) it may seek documents and
15 evidence protected from disclosure by other privileges or doctrines that are not readily apparent
16 given the broad scope of the request.

17
18 DATED: November 1, 2021

Respectfully submitted,

19 BROWNE GEORGE ROSS
20 O'BRIEN ANNAGUEY & ELLIS LLP
21 Ivy A. Wang
22 David J. Carroll

23 By: /s/ David J. Carroll

24 David J. Carroll

25 Attorneys for Defendants Vertical Bliss, Inc., Kushy
26 Punch, Inc., Conglomerate Marketing LLC, More
27 Agency, Inc., Arutyun Barsamyan, and Mike A.
28 Toroyan

Exhibit 12

Ethan Turner

From: Ethan Turner
Sent: Friday, November 5, 2021 2:46 PM
To: David J. Carroll; Ivy A. Wang
Cc: Harinder Kapur; Robert White
Subject: Meet and Confer RE: Discovery responses California Dept. of Public Health et al. v. Vertical Bliss, Inc., et al.:

Dear David and Ivy,

The responses provided do not meet the minimum statutory requirements for discovery responses.

The answers given are not made under oath (Code Civ. Proc § 2030.210, subd. (a)). No responsive information is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)), the objections are without merit and are too general (Code Civ. Proc., § 2030.300, subd. (a)(3)) and all objections are made without connecting the questions to any “specific ground for the objection.” (Code Civ. Proc., § 2030.240, subd. (b).)

There have been three extensions to the deadlines for discovery, you failed to meet the last deadline that was given and ultimately produced totally inadequate responses.

With the trial date just seven months away, we cannot afford further delays to meaningful discovery. Please consider this email our attempt to meet and confer with you regarding the inadequacy of the responses that were served on November 1.

We’re going to need actual, legitimate responses to the discovery we propounded. Please undertake whatever efforts are necessary to secure the cooperation of your clients to provide responses that at least meet the minimum statutory requirements by November 22, 2021.

I would also point out that there is one discrepancy between the proof of service and the documents that we received via email on 11/1. Item 11 “DEFENDANT ARUTYUN BARSAMYAN’S RESPONSES TO PLAINTIFF CALIFORNIA DEPARTMENT OF PUBLIC HEALTH’S FORM INTERROGATORIES - GENERAL, SET ONE” is not attached to the email.

Thanks,

Ethan Turner
Deputy Attorney General
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



From: Corinne Ubence <cubence@bgrfirm.com>

Sent: Monday, November 1, 2021 4:58 PM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Natalie Clark <Natalie.Clark@doj.ca.gov>; ian.stewart@wilsonelser.com; margarita@msalazarlaw.com

Cc: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>; Timothy O'Shea <toshea@bgrfirm.com>

Subject: California Dept. of Public Health et al. v. Vertical Bliss, Inc., et al.

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

Dear Counsel,

Attached are service copies of Defendant's discovery responses in the above matter along with a letter of today's date.

Regards,

BGR | BROWNE GEORGE ROSS
O'BRIEN ANNAGUEY & ELLIS LLP

Corinne Ubence | Legal Assistant to

Carl A. Roth, David Carroll,

Matthew Kussman and Luke Fiedler

801 S. Figueroa Street, Suite 2000

Los Angeles, California 90017

Main 213.725.9800 | Fax 213.725.9808

cubence@bgrfirm.com

www.bgrfirm.com

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from your computer.

Exhibit 13

Ethan Turner

From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Monday, November 15, 2021 4:13 PM
To: Ethan Turner; Ivy A. Wang
Cc: Harinder Kapur; Robert White
Subject: RE: Meet and Confer Discovery responses California Dept. of Public Health et al. v. Vertical Bliss, Inc., et al.: [IWOV-DOCSLA.FID365123]

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

Ethan,

We are continuing to attempt to secure from our clients substantive responses to your clients' discovery requests while we remain counsel of record. We served our objections simply to preserve them, as we otherwise did not have verified responses to provide. I will advise you this week of any progress we are able to make on securing substantive responses.

With respect to Defendant Barsamyan's responses, our e-mail did contain his responses to Form Interrogatories, but they were just incorrectly labeled as responses to requests for production of documents.

Thanks,
David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Friday, November 5, 2021 2:46 PM
To: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Robert White <Robert.White@doj.ca.gov>
Subject: Meet and Confer RE: Discovery responses California Dept. of Public Health et al. v. Vertical Bliss, Inc., et al.:

Dear David and Ivy,

The responses provided do not meet the minimum statutory requirements for discovery responses.

The answers given are not made under oath (Code Civ. Proc § 2030.210, subd. (a)). No responsive information is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)), the objections are without merit and are too general (Code Civ. Proc., § 2030.300, subd. (a)(3)) and all objections are made without connecting the questions to any "specific ground for the objection." (Code Civ. Proc., § 2030.240, subd. (b).)

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We're going to need actual, legitimate responses to the discovery we propounded. Please undertake whatever efforts are necessary to secure the cooperation of your clients to provide responses that at least meet the minimum statutory requirements by November 22, 2021.

I would also point out that there is one discrepancy between the proof of service and the documents that we received via email on 11/1. Item 11 "DEFENDANT ARUTYUN BARSAMYAN'S RESPONSES TO PLAINTIFF CALIFORNIA DEPARTMENT OF PUBLIC HEALTH'S FORM INTERROGATORIES - GENERAL, SET ONE" is not attached to the email.

Thanks,

Ethan Turner

Deputy Attorney General
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



From: Corinne Ubence <cubence@bgrfirm.com>

Sent: Monday, November 1, 2021 4:58 PM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Natalie Clark <Natalie.Clark@doj.ca.gov>; ian.stewart@wilsonelser.com; margarita@msalazarlaw.com

Cc: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>; Timothy O'Shea <toshea@bgrfirm.com>

Subject: California Dept. of Public Health et al. v. Vertical Bliss, Inc., et al.

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

Dear Counsel,

Attached are service copies of Defendant's discovery responses in the above matter along with a letter of today's date.

Regards,



Corinne Ubence | Legal Assistant to
Carl A. Roth, David Carroll,
Matthew Kussman and Luke Fiedler
801 S. Figueroa Street, Suite 2000
Los Angeles, California 90017
Main 213.725.9800 | Fax 213.725.9808
cubence@bgrfirm.com
www.bgrfirm.com

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Exhibit 14

Ethan Turner

From: David J. Carroll <dcarroll@bgrfirm.com>
Sent: Tuesday, November 23, 2021 8:37 AM
To: Ethan Turner; Ivy A. Wang
Cc: Harinder Kapur; Robert White
Subject: RE: Meet and Confer Discovery responses California Dept. of Public Health et al. v. Vertical Bliss, Inc., et al.: [IWOV-DOCSLA.FID365123]

ProfiledItem: true

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

Ethan,

We have not had any luck obtaining substantive discovery responses for our clients. If you are available for a call to discuss further steps, I think that may be beneficial to both of us. As you know, we have also refiled our motions to withdraw as counsel in this case, which may impact any discovery motions.

Thanks,
David

From: David J. Carroll
Sent: Monday, November 15, 2021 4:13 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Ivy A. Wang <iwang@bgrfirm.com>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Robert White <Robert.White@doj.ca.gov>
Subject: RE: Meet and Confer Discovery responses California Dept. of Public Health et al. v. Vertical Bliss, Inc., et al.: [IWOV-DOCSLA.FID365123]

Ethan,

We are continuing to attempt to secure from our clients substantive responses to your clients' discovery requests while we remain counsel of record. We served our objections simply to preserve them, as we otherwise did not have verified responses to provide. I will advise you this week of any progress we are able to make on securing substantive responses.

With respect to Defendant Barsamyan's responses, our e-mail did contain his responses to Form Interrogatories, but they were just incorrectly labeled as responses to requests for production of documents.

Thanks,
David

From: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Friday, November 5, 2021 2:46 PM
To: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Robert White <Robert.White@doj.ca.gov>
Subject: Meet and Confer RE: Discovery responses California Dept. of Public Health et al. v. Vertical Bliss, Inc., et al.:

Dear David and Ivy,

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The answers given are not made under oath (Code Civ. Proc § 2030.210, subd. (a)). No responsive information is provided (Code Civ. Proc. § 2030.210, subd. (a)(1)), the objections are without merit and are too general (Code Civ. Proc., § 2030.300, subd. (a)(3)) and all objections are made without connecting the questions to any “specific ground for the objection.” (Code Civ. Proc., § 2030.240, subd. (b).)

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I would also point out that there is one discrepancy between the proof of service and the documents that we received via email on 11/1. Item 11 “DEFENDANT ARUTYUN BARSAMYAN’S RESPONSES TO PLAINTIFF CALIFORNIA DEPARTMENT OF PUBLIC HEALTH’S FORM INTERROGATORIES - GENERAL, SET ONE” is not attached to the email.

Thanks,

Ethan Turner

Deputy Attorney General
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



From: Corinne Ubence <cubence@bgrfirm.com>

Sent: Monday, November 1, 2021 4:58 PM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Natalie Clark <Natalie.Clark@doj.ca.gov>; ian.stewart@wilsonelser.com; margarita@msalazarlaw.com

Cc: David J. Carroll <dcarroll@bgrfirm.com>; Ivy A. Wang <iwang@bgrfirm.com>; Timothy O'Shea <toshea@bgrfirm.com>

Subject: California Dept. of Public Health et al. v. Vertical Bliss, Inc., et al.

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

Dear Counsel,

Attached are service copies of Defendant's discovery responses in the above matter along with a letter of today's date.

Regards,

BGR | BROWNE GEORGE ROSS
O'BRIEN ANNAGUEY & ELLIS LLP

Corinne Ubence | Legal Assistant to

Carl A. Roth, David Carroll,

Matthew Kussman and Luke Fiedler

801 S. Figueroa Street, Suite 2000

Los Angeles, California 90017

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cubence@bgrfirm.com

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from your computer.

Exhibit 15

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Ivy A. Wang (SBN 224899) / David J. Carroll (SBN 291665) Browne George Ross O'Brien Annaguey & Ellis LLP 801 S. Figueroa Street, Suite 2800 Los Angeles, CA 90017 TELEPHONE NO.: (213) 725-9800 FAX NO. (Optional): (213) 725-9808 E-MAIL ADDRESS (Optional): iwang@bgrfirm.com / dcarroll@bgrfirm.com ATTORNEY FOR (Name): Defendants	FOR COURT USE ONLY
SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES STREET ADDRESS: 9425 Penfield Avenue MAILING ADDRESS: CITY AND ZIP CODE: Chatsworth, CA 91311 BRANCH NAME: Chatsworth Courthouse	
CASE NAME: Cal. Dep't of Public Health, et al. v. Vertical Bliss, Inc., et al.	
SUBSTITUTION OF ATTORNEY—CIVIL (Without Court Order)	CASE NUMBER: 20CHCV00560

THE COURT AND ALL PARTIES ARE NOTIFIED THAT (name): More Agency, Inc. makes the following substitution:

1. **Former legal representative** ☐ Party represented self ☒ Attorney (name): Browne George Ross O'Brien Annaguey & Ellis LLP
2. **New legal representative** ☐ Party is representing self* ☒ Attorney
 a. Name: Margarita Salazar
 b. State Bar No. (if applicable): 224649
 c. Address (number, street, city, ZIP, and law firm name, if applicable):
 Law Offices of Margarita Salazar, APLC
 470 Third Avenue, Chula Vista, CA 91910
 d. Telephone No. (include area code): 619-994-9578
3. The party making this substitution is a ☐ plaintiff ☒ defendant ☐ petitioner ☐ respondent ☐ other (specify):

***NOTICE TO PARTIES APPLYING TO REPRESENT THEMSELVES**

- Guardian
- Personal Representative
- Guardian ad litem
- Conservator
- Probate fiduciary
- Unincorporated association
- Trustee
- Corporation

If you are applying as one of the parties on this list, you may NOT act as your own attorney in most cases. Use this form to substitute one attorney for another attorney. SEEK LEGAL ADVICE BEFORE APPLYING TO REPRESENT YOURSELF.

NOTICE TO PARTIES WITHOUT ATTORNEYS

A party representing himself or herself may wish to seek legal assistance. Failure to take timely and appropriate action in this case may result in serious legal consequences.

4. I consent to this substitution.

Date: December 17, 2021

Ruben Kachian aka Ruben Cross

(TYPE OR PRINT NAME)

(SIGNATURE OF PARTY)

5. ☒ I consent to this substitution.

Date: December 17, 2021

David J. Carroll

(TYPE OR PRINT NAME)

(SIGNATURE OF FORMER ATTORNEY)

6. ☒ I consent to this substitution.

Date: December 17, 2021

Margarita Salazar

(TYPE OR PRINT NAME)

(SIGNATURE OF NEW ATTORNEY)

(See reverse for proof of service by mail)

Page 1 of 2

1 **PROOF OF SERVICE**

2 **California Dept. of Public Health et al. v. Vertical Bliss, Inc. et al.**
3 **Case No. 20CHCV00560**

4 **STATE OF CALIFORNIA, COUNTY OF LOS ANGELES**

5 At the time of service, I was over 18 years of age and not a party to this action. I am
6 employed in the County of Los Angeles, State of California. My business address is 801 S.
7 Figueroa Street, Suite 2000, Los Angeles, CA 90017.

8 On December 21, 2021, I served true copies of the following document(s) described as
9 **SUBSTITUTION OF ATTORNEY** on the interested parties in this action as follows:

10 **SEE ATTACHED SERVICE LIST**

11 **BY E-MAIL OR ELECTRONIC TRANSMISSION:** On December 21, 2021, I caused
12 a copy of the document(s) to be sent from e-mail address cubence@bgrfirm.com to the persons at
13 the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the
14 transmission, any electronic message or other indication that the transmission was unsuccessful.

15 **BY ELECTRONIC SERVICE:** I served the document(s) on the person listed in the
16 Service List by submitting an electronic version of the document(s) to One Legal, LLC, through
17 the user interface at www.onelegal.com.

18 I declare under penalty of perjury under the laws of the State of California that the
19 foregoing is true and correct.

20 Executed on December 21, 2021, at Los Angeles, California.

21
22
23
24
25
26
27
28


Corinne Ubence

SERVICE LIST
California Dept. of Public Health et al. v. Vertical Bliss, Inc. et al.
Case No. 20CHCV00560

Xavier Becerra
Attorney General of California
Harinder K. Kapur
Senior Assistant Attorney General
Ethan A. Turner
Deputy Attorney General
1300 I Street, Suite 125
P.O. Box 944255
Sacramento, CA 94244-2550
Tel: 916.210.7898
ethan.turner@doj.ca.gov
harinder.kapur@doj.ca.gov
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Attorneys for Plaintiffs
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and Bureau of Cannabis Control

Ian Stewart, Esq.
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555 S. Flower Street, Suite 2900
Los Angeles, CA 90071
Tel: 213.443.5100
ian.stewart@wilsonelser.com

Attorneys for Defendant
Kevin Halloran

Margarita Salazar, Esq.
Law Offices of Margarita Salazar, APLC
470 Third Avenue, Suite 9
Chula Vista, CA 91910
Tel: 619.994.9578
margarita@msalazarlaw.com

Attorney for Defendant
Ruben Kachian

Exhibit 16

From: [Ethan Turner](#)
To: [Margarita Salazar, Esq.](#)
Cc: [Harinder Kapur](#); [Michael Yun](#)
Subject: Vertical Bliss
Date: Tuesday, December 21, 2021 4:52:12 PM
Attachments: [11.5.21 Meet and Confer re discovery.pdf](#)

Ms. Salazar,

Now that you have taken over representing all defendants except Mr. Halloran, there are a couple of matters I would like to discuss with you as soon as possible because our trial date is only six months away and we're running out of time.

First, the Court ordered all parties to engage in mediation within 60 days of our case management conference. That deadline has long since passed. We need to agree on a mediator and undertake that process as soon as possible. I would like to set up a conference call with you and Mr. Stewart (Halloran's counsel) to move this process forward. Perhaps the three of us can find a time that will work for all of us in the first two weeks of 2022.

Second, as we have discussed with Mr. Carroll, the discovery responses provided by the defendants formerly represented by BGR fail to comply with the requirements of the Civil Discovery Act (see attached email). I would like to meet and confer regarding this issue this week if possible.

Are you available tomorrow to discuss next steps? I am free after 10:30 a.m.

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 17

From: [Ethan Turner](#)
To: margarita@msalazarlaw.com
Cc: [Stewart, Ian](#); [Michael Yun](#); [Harinder Kapur](#)
Subject: FW: Vertical Bliss
Date: Monday, January 3, 2022 5:17:58 PM
Attachments: [11.5.21 Meet and Confer re discovery.pdf](#)

Ms. Salazar,

I'm following up on my December 21, email.

Please let me know when we can discuss these matters.

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: Tuesday, December 21, 2021 4:52 PM

To: 'Margarita Salazar, Esq.' <Margarita@msalazarlaw.com>

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

Subject: Vertical Bliss

Ms. Salazar,

Now that you have taken over representing all defendants except Mr. Halloran, there are a couple of matters I would like to discuss with you as soon as possible because our trial date is only six months away and we're running out of time.

First, the Court ordered all parties to engage in mediation within 60 days of our case management conference. That deadline has long since passed. We need to agree on a mediator and undertake that process as soon as possible. I would like to set up a conference call with you and Mr. Stewart (Halloran's counsel) to move this process forward. Perhaps the three of us can find a time that will work for all of us in the first two weeks of 2022.

Second, as we have discussed with Mr. Carroll, the discovery responses provided by the defendants formerly represented by BGR fail to comply with the requirements of the Civil Discovery Act (see attached email). I would like to meet and confer regarding this issue this week if possible.

Are you available tomorrow to discuss next steps? I am free after 10:30 a.m.

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 18

From: [Ethan Turner](#)
To: [Margarita Salazar, Esq.](#)
Cc: [Michael Yun](#); [Harinder Kapur](#)
Subject: RE: FW: Vertical Bliss
Date: Tuesday, January 4, 2022 1:40:10 PM

Ms. Salazar,

I will be in a meeting until 10:30. However, we can talk after that.

My co-counsel Michael Yun and my Supervisor, Harinder Kapur may also join in the call.

If 10:30 works for you I'll send you a conference call number and a participation code.

Thanks,

Ethan Turner

Deputy Attorney General III
California Department of Justice
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[Sacramento, CA 95814](#)
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From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>

Sent: Tuesday, January 4, 2022 1:15 PM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>

Cc: Stewart, Ian <Ian.Stewart@wilsonelser.com>; Michael Yun <Michael.Yun@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>

Subject: Re: FW: Vertical Bliss

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--

Hello, Ethan,

Can we do a call tomorrow morning? 10:00?

--m

On Mon, Jan 3, 2022 at 5:18 PM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Ms. Salazar,

I'm following up on my December 21, email.

Please let me know when we can discuss these matters.

Thanks,

Ethan Turner

**Deputy Attorney General III
California Department of Justice
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From: Ethan Turner
Sent: Tuesday, December 21, 2021 4:52 PM
To: 'Margarita Salazar, Esq.' <Margarita@msalazarlaw.com>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Michael Yun <Michael.Yun@doj.ca.gov>
Subject: Vertical Bliss

Ms. Salazar,

Now that you have taken over representing all defendants except Mr. Halloran, there are a couple of matters I would like to discuss with you as soon as possible because our trial date is only six months away and we're running out of time.

First, the Court ordered all parties to engage in mediation within 60 days of our case management conference. That deadline has long since passed. We need to agree on a mediator and undertake that process as soon as possible. I would like to set up a conference call with you and Mr. Stewart (Halloran's counsel) to move this process forward. Perhaps the three of us can find a time that will work for all of us in the first two weeks of 2022.

Second, as we have discussed with Mr. Carroll, the discovery responses provided by the defendants formerly represented by BGR fail to comply with the requirements of the Civil Discovery Act (see attached email). I would like to meet and confer regarding this issue this week if possible.

Are you available tomorrow to discuss next steps? I am free after 10:30 a.m.

Thanks,

Ethan Turner

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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

From: [Margarita Salazar](#)
To: [CCSCalendar](#)
Cc: [Michael Yun](#); [Harinder Kapur](#)
Subject: Re: Meet and Confer Regarding Inadequate Discovery Responses
Date: Wednesday, January 5, 2022 9:23:36 AM
Attachments: [mime-attachment.ics](#)

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Thank you.
I will be there for today's meeting.

--m
Margarita Salazar
Tel. / Text: (619) 994-9578

On Jan 5, 2022, at 8:41 AM, CCSCalendar <CCSCalendar@doj.ca.gov> wrote:

Ms. Salazar,

You did not respond to my email inquiring whether 10:30 a.m. this morning would work for you.

In the event that it does work, you can join me for a teleconference at 10:30, by dialing the following information

Phone Number: (888) 278 0296
Access Code: 4766034

As I told Mr. Carroll, the responses provided by your clients, Mr. Toroyon, Mr. Barsamyan, Kushy Punch, Inc., Conglomerate Marketing, and Vertical Bliss, Inc. are inadequate for the following reasons:

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).)

There have been three extensions to the deadlines for discovery, you failed to meet the last deadline that was given and ultimately produced totally inadequate responses. The trial date is now

barely more than six months away and no meaningful discovery has occurred.

Thanks,

Ethan Turner

**Deputy Attorney General III
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Exhibit 19

From: [Ethan Turner](#)
To: ["Margarita Salazar, Esq."](#)
Cc: [Harinder Kapur](#); [Michael Yun](#)
Subject: Meet and Confer Conversation
Date: Wednesday, January 5, 2022 1:04:00 PM
Attachments: [Vertical Bliss et al. Global Demand Letter.pdf](#)
[image001.jpg](#)

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
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Exhibit 20

From: [Margarita Salazar, Esq.](#)
To: [Stewart, Ian](#)
Cc: [Ethan Turner](#); [Harinder Kapur](#); [Michael Yun](#); [Kevin Knox](#)
Subject: Re: Mediators
Date: Friday, January 7, 2022 8:07:05 AM
Attachments: [image004.png](#)
[image005.png](#)

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We agree. Feb. 28 with Judge Adler is good.

Please send whatever followup information we need to proceed.

Thank you.

--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

On Thu, Jan 6, 2022 at 4:54 PM Stewart, Ian <Ian.Stewart@wilsonelser.com> wrote:

Ethan,

Feb 28 with Judge Andler is acceptable to us.

Best regards,

Ian

Ian Stewart
Attorney at Law
Wilson Elser Moskowitz Edelman & Dicker LLP
555 South Flower Street Suite 2900
Los Angeles, CA 90071
213.330.8830 (Direct)
213.407.3124 (Cell)
213.443.5100 (Main)
213.443.5101 (Fax)
ian.stewart@wilsonelser.com

From: Ethan Turner [mailto:Ethan.Turner@doj.ca.gov]
Sent: Thursday, January 6, 2022 4:48 PM
To: Stewart, Ian <Ian.Stewart@wilsonelser.com>
Cc: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Michael Yun <Michael.Yun@doj.ca.gov>
Subject: Mediators

[EXTERNAL EMAIL]

Ian and Margarita,

I've reached out to the mediators on the list I sent to you.

I've received two responses. Both are pasted below. I suspect I'll receive responses from the other mediators tomorrow or Monday, but I suspect that Judge Andler will be able to provide us with the earliest possible date. She is available on 2/28 for a full day virtual session. Whereas Sundvold is booked well into the future, but an opening *may* appear during the week of March 21 (the email from his case manager is pasted at the very bottom of this email).

Given how little time we have before trial, I think we should book the earliest possible date. For this reason, unless one of you disagrees, I think we should book Andler right away and prepare for mediation on 2/28. What are your thoughts?

Thanks,

Ethan Turner

Deputy Attorney General III

California Department of Justice

Office of the Attorney General

Division of Civil Law

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From: Matthew Levington <MLevington@jamsadr.com>
Sent: Thursday, January 6, 2022 4:02 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>
Subject: RE: Availability of Gail A. Andler

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Good afternoon,

Thank you for reaching out and thinking of Judge Andler.

At this time, she has February 28th open for a full day virtual session. There is a chance March 7-11 open up on calendar, but I will not know for sure until Monday.

In the meantime, let me know if the 28th works for the parties and I can hold the date on calendar while we move forward with scheduling.

Thanks again.



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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Good Afternoon,

Thank you for your inquiry. Currently, Judge Sundvold is booked solid until June/July; however, he might have the week of March 21st open up next week and I recommend you circle back with me at that time, i.e., on or after January 13th.

Thank you,

~Lisa



Lisa Winch
Case Manager

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P: 714-937-8219

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Please Note: JAMS will be closed from Dec. 24, 2021 through Jan. 3, 2022.

Happy Holidays!

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For further information about Wilson, Elser, Moskowitz, Edelman & Dicker LLP, please see our website at www.wilsonelser.com or refer to any of our offices.

Thank you.

--

--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 21

From: [Margarita Salazar, Esq.](#)
To: [Ethan Turner](#)
Cc: [Stewart, Ian](#); [Michael Yun](#); [Harinder Kapur](#); [Kevin Knox](#)
Subject: Re: Availability of Gail A. Andler - JAMS Ref. 1200059240
Date: Monday, January 10, 2022 12:37:23 PM
Attachments: [image002.png](#)

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

Ethan,

This is agreeable to me.

--m

On Mon, Jan 10, 2022 at 11:49 AM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Margarita,

Do you have a response to Ian's proposal below?

Please advise.

Thanks,

-Ethan Turner

Ethan Turner

Deputy Attorney General III

California Department of Justice

Office of the Attorney General

Division of Civil Law

Cannabis Control Section

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From: Stewart, Ian <Ian.Stewart@wilsonelser.com>

Sent: Friday, January 7, 2022 11:53 AM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>; Margarita Salazar, Esq. <Margarita@msalazarlaw.com>

Cc: Michael Yun <Michael.Yun@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Kevin Knox <kevin@msalazarlaw.com>

Subject: RE: Availability of Gail A. Andler - JAMS Ref. 1200059240

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I'm Okay with the Kushy Punch corporate entities paying a single share, but all the individuals including Mr. Kachian should be considered separate parties so that it is split six ways as follows:

1. Kushy Punch Corp entities
2. Ruben Kachian,
3. Arutyun Barsamyan,
4. Mike A. Toroyon

5. Kevin Holloran
6. Department of Cannabis Control

Ian Stewart
Attorney at Law
Wilson Elser Moskowitz Edelman & Dicker LLP
555 South Flower Street Suite 2900
Los Angeles, CA 90071
213.330.8830 (Direct)
213.407.3124 (Cell)
213.443.5100 (Main)
213.443.5101 (Fax)
ian.stewart@wilsonelser.com

From: Ethan Turner [<mailto:Ethan.Turner@doj.ca.gov>]
Sent: Friday, January 7, 2022 11:37 AM
To: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>
Cc: Stewart, Ian <Ian.Stewart@wilsonelser.com>; Michael Yun <Michael.Yun@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Kevin Knox <kevin@msalazarlaw.com>
Subject: RE: Availability of Gail A. Andler - JAMS Ref. 1200059240

[EXTERNAL EMAIL]

Margarita,

So what you're proposing would be a five way split with Kachian, Kushy Punch, Vertical Bliss, Conglomerate Marketing, and More Agency paying a single share. Is that right?

I'll check with my client – Ian what are your thoughts

Also, for the purpose of providing service addresses: I am a fan of electronic service for all purposes. Do you two wish to receive mail from the mediation service? Or should we just provide email addresses?

Thanks,

Ethan

Ethan Turner

Deputy Attorney General III

California Department of Justice

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From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>

Sent: Friday, January 7, 2022 11:26 AM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>

Cc: Stewart, Ian <Ian.Stewart@wilsonelser.com>; Michael Yun <Michael.Yun@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Kevin Knox <kevin@msalazarlaw.com>

Subject: Re: Availability of Gail A. Andler - JAMS Ref. 1200059240

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Ethan,

Well, that sounds terrible.

I'm wondering if there is any way to consolidate the entities' interest with Ruben Kachian's claims so that my individual client is not paying a disproportionate amount of the fees. This is for purposes of the mediation only.

I'll ask JAMS.

--m

On Fri, Jan 7, 2022 at 11:15 AM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Margarita and Ian,

Regarding the fee split issue discussed below, I would propose that the parties each take a share of the fee. In other words the mediation fee would be split 9 ways with each party paying \$ 1,111.11.

1. Vertical Bliss, Inc.,
2. Kushy Punch Inc.,
3. Conglomerate Marketing, LLC,
4. More Agency, Inc.,

5. Ruben Kachian,
6. Arutyun Barsamyan,
7. Mike A. Toroyon
8. Kevin Holloran
9. Department of Cannabis Control

How does that sound?

Thanks,

-Ethan

From: Matthew Levington <MLevington@jamsadr.com>
Sent: Friday, January 7, 2022 9:37 AM
To: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>; Ethan Turner <Ethan.Turner@doj.ca.gov>
Cc: Stewart, Ian <Ian.Stewart@wilsonelser.com>; Michael Yun <Michael.Yun@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Kevin Knox <kevin@msalazarlaw.com>
Subject: RE: Availability of Gail A. Andler - JAMS Ref. 1200059240

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Dear Counsel,

Thank you for your emails.

This email shall confirm I am holding February 28 on Judge Andler's calendar for your full day virtual mediation via Zoom with a 930 AM start time. To move forward with scheduling, please send me the following case and scheduling details.

- Case Caption

- Service List with confirmation of parties represented
- Case Type or Description
- Fee Split
- Confirmation whether Class Action dispute

Attached is a copy of Judge Andler's mediation fee schedule. Yes, in addition to her daily rate, there is a \$475 per interested party case management fee.

Upon receipt of the above information, JAMS will forward engagement agreements via DocuSign for review and execution. Upon receipt of all executed agreements, the date will be confirmed on calendar with Notice, invoices and briefing instructions to follow.

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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From: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>
Sent: Friday, January 7, 2022 9:15 AM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>
Cc: Matthew Levington <MLevington@jamsadr.com>; Stewart, Ian <Ian.Stewart@wilsonelser.com>; Michael Yun <Michael.Yun@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@doj.ca.gov>; Kevin Knox <kevin@msalazarlaw.com>
Subject: Re: Availability of Gail A. Andler

Dear Mr. Levington:

We ask that you kindly provide a fee schedule so that we can remit the payment directly to JAMS.

I believe there is a PER PARTY fee, is that correct?

Also, **Mr. Turner**, I ask that you confirm that all of the parties include those on the operative complaint.

Thank you.

--m

On Fri, Jan 7, 2022 at 8:43 AM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Mr. Levington,

Each of the parties can be available for a February 28.

Please reply all to this email with the necessary details.

Thanks,

-Ethan

Ethan Turner

Deputy Attorney General III

California Department of Justice

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From: Matthew Levington <MLevington@jamsadr.com>

Sent: Thursday, January 6, 2022 4:02 PM

To: Ethan Turner <Ethan.Turner@doj.ca.gov>

Subject: RE: Availability of Gail A. Andler

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Good afternoon,

Thank you for reaching out and thinking of Judge Andler.

At this time, she has February 28th open for a full day virtual session. There is a chance March 7-11 open up on calendar, but I will not know for sure until Monday.

In the meantime, let me know if the 28th works for the parties and I can hold the date on calendar while we move forward with scheduling.

Thanks again.



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: Ethan Turner <Ethan.Turner@doj.ca.gov>
Sent: Thursday, January 6, 2022 2:45 PM
To: Matthew Levington <MLEvington@jamsadr.com>
Subject: Availability of Gail A. Andler

Mr. Levington,

I'm writing to inquire about the availability of Gail Andler for mediation. I realize she likely has an impacted schedule, but I am hoping that he might have some availability for a mediation session during the month of February or the last two weeks of March.

I'm reaching out to several retired judge mediators to check on availability, because the circumstances require that mediation happen rather soon in our case.

Thanks,

Ethan Turner

Deputy Attorney General III

California Department of Justice

Office of the Attorney General

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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

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For further information about Wilson, Elser, Moskowitz, Edelman & Dicker LLP, please see our website at www.wilsonelser.com or refer to any of our offices.

Thank you.

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470 Third Avenue, Suite 9
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Cell / Text: 619.994.9578
Fax: 877.264.4695

Exhibit 22

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 7th, regarding the consolidation of the Plaintiff agencies, the discovery matters we discussed on January 5th, 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 21st. 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 7th. 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>

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

Subject: Meet and Confer Conversation

Margarita,

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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
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Exhibit 23

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
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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

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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,

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Ethan Turner

Deputy Attorney General III

California Department of Justice

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From: Ethan Turner

Sent: Wednesday, January 12, 2022 12:35 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>

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

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Thanks,

Ethan Turner

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From: Ethan Turner

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

To: 'Margarita Salazar, Esq.' <Margarita@msalazarlaw.com>

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

Subject: Meet and Confer Conversation

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Thanks,

Ethan Turner

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Exhibit 24

Ethan Turner

From: Margarita Salazar, Esq. <margarita@msalazarlaw.com>
Sent: Wednesday, January 19, 2022 8:51 AM
To: Ethan Turner
Subject: OUT DUE TO COVID-19 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.

***** NOTICE OF UNAVAILABILITY *****

I will be out of the office today with limited phone and email access. I will return all calls and emails when I return to the office.

Thank you.

--m

--

--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 25

From: [Ethan Turner](#)
To: [Kevin Knox](#)
Cc: [Margarita Salazar, Esq.](#); [Harinder Kapur](#); [Michael Yun](#)
Subject: FW: Meet and Confer Conversation
Date: Wednesday, January 19, 2022 9:03:06 AM

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>; '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,

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

Thanks,

-Ethan

Ethan Turner
Deputy Attorney General III
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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

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Sorry about that.

Thanks again,

Ethan

Ethan Turner

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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>; 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

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From: Ethan Turner
Sent: Wednesday, January 5, 2022 1:04 PM
To: 'Margarita Salazar, Esq.' <Margarita@msalazarlaw.com>
Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Michael Yun <Michael.Yun@doj.ca.gov>
Subject: Meet and Confer Conversation

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Thanks,

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Exhibit 26

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

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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> 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

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From: Ethan Turner
Sent: Wednesday, January 19, 2022 8:51 AM
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

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Ethan Turner

Deputy Attorney General III

California Department of Justice

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Sent: Wednesday, January 12, 2022 9:09 PM
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Cc: Michael Yun <Michael.Yun@doj.ca.gov>; Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>
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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 27

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> wrote:

Margarita,

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

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>; 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,

I'm following up on my emails from this morning regarding the mediation, the proposed stipulation that I sent on January 7th, regarding the consolidation of the Plaintiff agencies, the discovery matters we discussed on January 5th, 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 21st. 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 7th. 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
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From: Ethan Turner

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

To: 'Margarita Salazar, Esq.' <Margarita@msalazarlaw.com>

Cc: Harinder Kapur <Harinder.Kapur@Doj.Ca.Gov>; Michael Yun <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
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the intended recipient, please contact the sender and destroy all copies of the communication.

--

--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 28

Ethan Turner

From: Ethan Turner
Sent: Friday, January 21, 2022 4:30 PM
To: 'Margarita Salazar, Esq.'
Cc: Harinder Kapur; Michael Yun; 'Kevin Knox'
Subject: RE: Meet and Confer Conversation

Margarita,

Please clarify what you mean when you say “this” in your email.

Are you referring to Kachian’s discovery responses which the Court Order required to be produced yesterday? Or are you referring to the additional responses that we requested to cure the defects in the previous, non-code compliant discovery responses from Vertical Bliss, Inc., Kushy Punch, Inc., Conglomerate Marketing, LLC, More Agency, Inc., Toroyan, and Barsamyan? Or both

If we receive complete and code complaint responses for ALL DEFENDANTS you represent by 4:00 p.m. on Monday that will obviate the need for us to file additional motions to compel, but we cannot change the Court’s Order and we are not going to waive any right to compel discovery responses.

It is unfortunate that you had a COVID related incident in your office recently, but with deadlines for completion of discovery not far off, we cannot afford any more delays.

Finally, would you please let us know early next week whether you have been able to secure your clients’ cooperation for the proposed February 28th mediation?

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: Margarita Salazar, Esq. <Margarita@msalazarlaw.com>
Sent: Friday, January 21, 2022 3:56 PM
To: Ethan Turner <Ethan.Turner@doj.ca.gov>
Cc: 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'm sorry. I won't be able to get this to you by today. I will have it all to you by Monday. I was out due to a covid exposure and this put me way behind. Then today's hearing went long as well.

Please confirm that you agree with this extension request.

Thank you.

--m

On Fri, Jan 21, 2022 at 10:40 AM Ethan Turner <Ethan.Turner@doj.ca.gov> wrote:

Margarita,

Please confirm that you will be electronically serving your supplemental discovery responses for the former BGR clients and the initial discovery responses for Kachian today.

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: Thursday, January 20, 2022 9:42 AM

To: 'Margarita Salazar, Esq.' <Margarita@msalazarlaw.com>

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

Margarita,

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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

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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

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From: Ethan Turner

Sent: Wednesday, January 12, 2022 12:35 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

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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 21st. 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 7th. Let me know if you have had a chance to review it. I have attached it to this email for your easy reference.

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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

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From: Ethan Turner

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

To: 'Margarita Salazar, Esq.' <Margarita@msalazarlaw.com>

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

Subject: Meet and Confer Conversation

Margarita,

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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

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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

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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 29

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
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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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Manage your case anytime, anywhere. **Register now for [JAMS Access](#)**

Successfully Resolve Your Case Remotely

Check Out the [JAMS Videoconferencing Page](#) to Get Started

From: Matthew Levington

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

To: Ethan.Turner@doj.ca.gov; margarita@msalazarlaw.com; Michael.Yun@doj.ca.gov; Harinder.Kapur@doj.ca.gov

Cc: Helen.Koh@doj.ca.gov; 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 30

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

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 MORE AGENCY, INC.; DECLARATION OF ETHAN TURNER IN SUPPORT OF MTC; SEPARATE STATEMENT OF ISSUES IN SUPPORT OF MTC; AND COST DECLARATION BY DAG MICHAEL YUN IN SUPPORT OF MTC** by transmitting a true copy via electronic mail. In addition, I placed a true copy thereof enclosed in a sealed envelope, in the internal mail system of the Office of the Attorney General, addressed as follows:

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

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

A. Flores

Declarant



Signature

Exhibit B

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.**

May 26, 2022

8:30 AM

Judge: Honorable Stephen P. Pfahler
Judicial Assistant: Adrina Chebishyan
Courtroom Assistant: Patricia Aranda

CSR: None
ERM: None
Deputy Sheriff: None

APPEARANCES:

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

For Defendant(s): No Appearances

NATURE OF PROCEEDINGS: Hearing on Motion to Compel Further Discovery Responses; Hearing on Motion to Compel Discovery (not "Further Discovery") to Request for Production, Set One - Ruben Kachian; Hearing on Motion to Compel Further Discovery Responses; Hearing on Motion to Compel Further Discovery Responses; Hearing on Motion to Compel Further Discovery Responses; Hearing on Motion to Compel Further Discovery Responses

The matters are called for hearing.

The Court reads and considers the moving papers in support of the motion.

After Court and Counsel confer, and Court takes the matters under submission:

LATER:

The Court rules as follows:

COMPEL

MOVING PARTY: Plaintiff, California Department of Public Health and Bureau of Cannabis Control

RESPONDING PARTY: Unopposed/Defendants, Kushy Punch, Inc., et al.

RELIEF REQUESTED

Motion to Compel Further Responses to Form Interrogatories (set one), Request for Production of Documents (set one), and Request for Admissions (set one)

RULING: Granted

Plaintiff California Department of Public Health and Bureau of Cannabis Control brings a series

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.**

May 26, 2022

8:30 AM

Judge: Honorable Stephen P. Pfahler
Judicial Assistant: Adrina Chebishyan
Courtroom Assistant: Patricia Aranda

CSR: None
ERM: None
Deputy Sheriff: None

of motions to compel further responses to Form Interrogatories (set one), Request for Production of Documents, and Request for Admissions (set one) from Defendants Kushy Punch, Inc., Vertical Bliss, Inc., Conglomerate Marketing, LLC, More Agency, Inc., Artyun Barsamyan, and Mike Toroyan.

Plaintiff served Defendants on June 14, 2021. [Declaration of Ethan Turner, ¶ 2, Exhibits 1-3.] Following a number of extensions, responses consisting of objections were served on November 1, 2021. [Id., Ex. 9-11.] The subject motion comes after numerous extensions for supplemental responses. All discovery responses contain the same objections: overbroad and burdensome, attorney client and work product privilege, and a reservation of unstated objections.

The burdensome objections lack merit. Objecting parties must file evidence detailing the amount of work involved, in order to support objections based upon burden and oppression. (West Pico Furniture Co. v. Sup. Ct. (1961) 56 Cal.2d 407, 417.) “[S]ome burden is inherent in all demands for discovery. The objection of burden is valid only when that burden is demonstrated to result in injustice.” (Id. at p. 418.) The overbroad objection also lacks merit. (Obregon v. Superior Court (1998) 67 Cal.App.4th 424, 431.)

The attorney-client privilege attaches to a confidential communication between the attorney and the client and bars discovery of the communication irrespective of whether it includes unprivileged material.” (Costco Wholesale Corp. v. Superior Court (2009) 47 Cal.4th 725, 734.) The transmission of information between third parties and counsel also maintain attorney client privilege protection, if the communication is in further interest of the client. (Evid. Code, § 952.) “Once that party establishes facts necessary to support a prima facie claim of privilege, the communication is presumed to have been made in confidence and the opponent of the claim of privilege has the burden of proof to establish the communication was not confidential or that the privilege does not for other reasons apply.” (Costco Wholesale Corp. v. Superior Court, supra, 47 Cal.4th at p. 733.)

The work product privilege applies where the sought after documents contains Defendant’s “impressions, conclusions, opinions or legal research or theories,” the information is protected by the work product doctrine. (Code Civ. Proc., § 2018.030(c).) “An objecting party may be entitled to protection if it can make a preliminary or foundational showing that answering the interrogatory would reveal the attorney’s tactics, impressions, or evaluation of the case, or would result in opposing counsel taking undue advantage of the attorney’s industry or efforts”].) (Coito v. Superior Court (2012) 54 Cal.4th 480, 502.) Notes, statements, and impressions of the case are protected by the work product doctrine. A list of potential witnesses is not work product. (Coito

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.**

May 26, 2022

8:30 AM

Judge: Honorable Stephen P. Pfahler
Judicial Assistant: Adrina Chebishyan
Courtroom Assistant: Patricia Aranda

CSR: None
ERM: None
Deputy Sheriff: None

v. Superior Court (2012) 54 Cal.4th 480, 495; Nacht & Lewis Architects, Inc. v. Superior Court (1996) 47 Cal.App.4th 214, 217–218.)

The burden of establishing that a particular matter is privileged is on the party asserting the privilege.” (American Airlines, Inc. v. Superior Court (2003) 114 Cal.App.4th 881, 887.) The responses provide no support for the privilege objections. Regardless, if Defendants are actually withholding any documents on the basis of privilege, Defendants are ordered to produce a privilege log. (Code Civ. Proc., § 2031.240, subd. (c).) Defendants are additionally ordered to produce further responses in compliance with Code of Civil Procedure sections 2030.220, (subd. a-b), 2031.220-230, and 2033.220 within 20 days of this order.

The objections and lack of opposition to the motion otherwise supports a finding of meritless objections to the challenged items. Defendants are additionally ordered to produce further responses in compliance with Code of Civil Procedure sections 2030.220, (subd. a-b), 2031.220-230, and 2033.220 within 20 days of this order.

Sanctions in the amount of \$250 per defendant joint and severally imposed against each individual defendants Kushy Punch, Inc, Vertical Bliss, Inc., Conglomerate Marketing, LLC, More Agency, Inc., Artyun Barsamyan, and Mike Toroyan, and their respective attorneys of record. Payable within 30 days of this order. (Code Civ. Proc., §§ 2030.300, subd. (d), 2031.310, subd. (h), and 2033.290, subd. (d).) Total sanctions of \$1,500—six defendants @\$250/motion.

Motions to compel set for June 7 and 10, 2022.

COMPEL

MOVING PARTY: Plaintiff, California Department of Public Health and Bureau of Cannabis Control

RESPONDING PARTY: Unopposed/Defendant, Ruben Kachian aka Ruben Cross

RELIEF REQUESTED

Motion to Compel Responses to Request for Production of Documents (set one)

RULING: Off-Calendar

The motion was filed and served on May 5, 2022, which is exactly 15 court days from the date of the hearing. (Code Civ. Proc., §§ 12, 12a, 12b, 12c, 1005, subd. (b).) The motion is therefore

SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES

Civil Division

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20CHCV00560

May 26, 2022

CALIFORNIA DEPARTMENT OF PUBLIC HEALTH, et al.

8:30 AM

vs VERTICAL BLISS, INC., et al.

Judge: Honorable Stephen P. Pfahler
Judicial Assistant: Adrina Chebishyan
Courtroom Assistant: Patricia Aranda

CSR: None
ERM: None
Deputy Sheriff: None

untimely.

Motion to compel set for June 7, 2022.

Clerk is to give notice.

Certificate of Mailing is attached.

<p align="center">SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES</p>	<p align="center">Reserved for Clerk's File Stamp</p>
<p>COURTHOUSE ADDRESS: Chatsworth Courthouse 9425 Penfield Avenue, Chatsworth, CA 91311</p>	<p align="center">FILED Superior Court of California County of Los Angeles 05/26/2022</p>
<p>PLAINTIFF/PETITIONER: CALIFORNIA DEPARTMENT OF PUBLIC HEALTH et al</p>	<p align="center">Sherri R. Carter, Executive Officer / Clerk of Court By: <u>A. Chebishyan</u> Deputy</p>
<p>DEFENDANT/RESPONDENT: VERTICAL BLISS, INC. et al</p>	
<p align="center">CERTIFICATE OF MAILING</p>	<p>CASE NUMBER: 20CHCV00560</p>

I, the below-named Executive Officer/Clerk of the above-entitled court, do hereby certify that I am not a party to the cause herein, and that on this date I served the Minute Order (Hearing on Motion to Compel Further Discovery Responses; Hear...) of 05/26/2022 upon each party or counsel named below by placing the document for collection and mailing so as to cause it to be deposited in the United States mail at the courthouse in Chatsworth, California, one copy of the original filed/entered herein in a separate sealed envelope to each address as shown below with the postage thereon fully prepaid, in accordance with standard court practices.

California Department of Cannabis Control

California Department of Cannabis Control (Plaintiff - Substituted/Consolidated)

Margarita Salazar
Law Offices of Margarita Salazar, APLC
470 Third Avenue
Chula Vista, CA 91910

Ian Andrew Stewart
Wilson Elser
555 S Flower St Ste 2900
Los Angeles, CA 90071

ETHAN A. TURNER
Deputy Attorney General
1300 I Street, Suite 125
SACRAMENTO, CA 94244

Ivy A Wang
BROWNE GEORGE ROSS O'BRIEN ANNAGUEY
& ELLIS LLP
2121 Avenue of the Stars, Suite 2800
Los Angeles, CA 90067

Sherri R. Carter, Executive Officer / Clerk of Court

Dated: 05/27/2022

By: A. Chebishyan
Deputy Clerk

CERTIFICATE OF MAILING

Exhibit C



Transaction Detail for Matter(s): SA2020800072

From May 3, 2022 To Jun 15, 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						
		6/14/22	Gen-29	Supervisory Review	Reviewed and edited DAG Yun's draft motion for sanctions, telephone call with DAG Yun to discuss edits to motion.	1.25	\$275.00
		6/15/22	Gen-29	Supervisory Review	Reviewed, edited, and discussed motion for sanctions and declaration in support thereof with DAG Yun.	1.75	\$385.00
Professional Name	Professional Type	Transaction Date	Task Code	Task Code Description	Transaction Narrative	Hours	Fees
Michael Yun	Attorney						
		5/3/22	Gen-04	Analysis/Strategy	Drafted email language to opposing counsel Margarita Salazar to comply with the Court's latest verbal Order and schedule a meet and confer with opposing counsel Salazar regarding discovery issues; sent language for review and approval to SAAG Harinder Kapur.	0.50	\$110.00



Transaction Detail for Matter(s): SA2020800072

From May 3, 2022 To Jun 15, 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						
		5/3/22	Gen-06	Communication with Other Party	Emailed opposing counsel Margarita Salazar to attempt to schedule a meet and confer pursuant to Court's verbal Order this morning in light of defense counsel and her client Defendants' demonstrated refusal to engage in discovery process and the motions currently scheduled in court.	0.25	\$55.00



Transaction Detail for Matter(s): SA2020800072

From May 3, 2022 To Jun 15, 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]



Transaction Detail for Matter(s): SA2020800072

From May 3, 2022 To Jun 15, 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						
		5/6/22	Gen-06	Communication with Other Party	Sent email to opposing counsel Margarita Salazar to attempt again to set up a meet and confer regarding her and her clients' outstanding discovery in accordance with Court's verbal order on May 3, 2022 because Salazar has not gotten back to her, again.	0.25	\$55.00



Transaction Detail for Matter(s): SA2020800072

From May 3, 2022 To Jun 15, 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	5/6/22	Gen-06	Communication with Other Party	Teleconference with opposing counsel Margarita Salazar pursuant to Court's instruction, along with co-counsel DAG Ethan Turner and SDAG Josh Eisenberg.	0.25	\$55.00
		5/6/22	Gen-12	Discovery-Offensive	Case discussion with co-counsel DAG Ethan Turner, SDAG Josh Eisenberg, and SAAG Harinder Kapur regarding discovery.	0.50	\$110.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		5/9/22	Gen-04	Analysis/Strategy	Case discussion with co-counsel DAG Ethan Turner as it relates to our meet and confer with opposing counsel Margarita Salazar.	0.25	\$55.00
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
		5/9/22	Gen-04	Analysis/Strategy	Drafted email addressed to opposing counsel Margarita Salazar to recap our meet and confer on May 6, 2022, and emailed it to SDAG Josh Eisenberg and SAAG Harinder Kapur for their review/approval.	0.25	\$55.00
		5/9/22	Gen-06	Communication with Other Party	Sent email to opposing counsel Margarita Salazar.	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]



Transaction Detail for Matter(s): SA2020800072

From May 3, 2022 To Jun 15, 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



Transaction Detail for Matter(s): SA2020800072

From May 3, 2022 To Jun 15, 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]



Transaction Detail for Matter(s): SA2020800072

From May 3, 2022 To Jun 15, 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]



From May 3, 2022 To Jun 15, 2022

[illegible]



Transaction Detail for Matter(s): SA2020800072

From May 3, 2022 To Jun 15, 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]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Transaction Detail for Matter(s): SA2020800072

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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]
		[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]



Transaction Detail for Matter(s): SA2020800072

From May 3, 2022 To Jun 15, 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						
		6/10/22	Gen-15	Other Submission/ Motion/ Appearance	Discussed logistics of the Motion for Sanctions drafting with SDAG Josh Eisenberg.	0.25	\$55.00
		6/10/22	Gen-15	Other Submission/ Motion/ Appearance	Discussed Motion for Sanctions strategy and drafting logistics with SAAG Harinder Kapur.	0.25	\$55.00
		6/10/22	Gen-15	Other Submission/ Motion/ Appearance	Drafted Motion for Sanctions.	5.00	\$1,100.00
		6/13/22	Gen-15	Other Submission/ Motion/ Appearance	Worked on drafting Motion for Sanctions.	1.50	\$330.00



Transaction Detail for Matter(s): SA2020800072

From May 3, 2022 To Jun 15, 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						
		6/14/22	Gen-15	Other Submission/ Motion/ Appearance	Drafted Motion for Sanctions; cross-referenced facts in Court's discovery order dated March 16, 2022 and previously filed Motion to Compel Further Responses; conducted legal research as it relates to the Motion for Sanctions and relevant discovery statutes; discussed the motion with SDAG Josh Eisenberg.	6.00	\$1,320.00
		6/15/22	Gen-15	Other Submission/ Motion/ Appearance	Requested AGO ProLaw accounting to provide cost accounting / billing narratives for my review and redaction in order to attach as an exhibit to Motion for Sanctions to request monetary sanction against Defense.	0.25	\$55.00
		6/15/22	Gen-15	Other Submission/ Motion/ Appearance	Requested Legal Secretary Alberto Flores to prepare the table of contents and table of authorities in Motion for Sanctions for my review.	0.25	\$55.00
		6/15/22	Gen-15	Other Submission/ Motion/ Appearance	Reviewed AGO ProLaw accounting documents and made redactions in order to prepare and attach as an exhibit to Motion for Sanctions.	1.00	\$220.00
		6/15/22	Gen-15	Other Submission/ Motion/ Appearance	Reviewed and prepared all exhibits to Declaration of DAG Michael Yun in Support of Motion for Sanctions against Defendant.	1.00	\$220.00
		6/15/22	Gen-15	Other Submission/ Motion/ Appearance	Reviewed input and edits on Motion for Sanctions from SDAG Josh Eisenberg; made revisions; had discussions on the phone with SDAG Eisenberg during series of phone calls; additional work on Declaration of Michael Yun in Support of Motion for Sanctions.	4.00	\$880.00