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STEPHEN LAKE

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF SAN DIEGO, HALL OF JUSTICE

AMY SHERLOCK, an individual and on
behalf of her minor children, T.S. and S.S.,
CHRISTOPHER WILLIAMS, an individual,
ANDREW FLORES, an individual

Plaintiffs,

vs.

GINA M. AUSTIN, an individual; AUSTIN
LEGAL GROUP, a professional corporation;
LARRY GERACI, an individual; REBECCA
BERRY, an individual; JESSICA
MCELFRESH, an individual; SALAM
RAZUKI, an individual; NINUS MALAN, an
individual; FINCH, THORTON, AND
BAIRD, a limited liability partnership;
ABHAY SCHWEITZER, an individual and
dba TECHNE; JAMES (AKA JIM)
BARTELL, an individual; NATALIE
TRANG-MY NGUYEN, an individual;
AARON MAGAGNA, an individual;
BRADFORD HARCOURT, an individual;
SHAWN MILLER, an individual; LOGAN
STELLMACHER, an individual;
EULENTHIAS DUANE ALEXANDER, an
individual; STEPHEN LAKE, an individual;
ALLIED SPECTRUM, INC., a California
corporation; PRODIGIOUS COLLECTIVES,
LLC, a limited liability company; and DOES 1
through 50, inclusive,

Defendants.

Case No. **37-2021-00050889-CU-AT-CTL**

**REQUEST FOR PRODUCTION OF
DOCUMENTS**
[SET ONE]

Case Filed:	December 3, 2021
Judge:	Hon. James A Mangione
Dept.:	C-75
Trial Date:	Not Set

Propounding Party: Defendant STEPHEN LAKE

Responding Party: Plaintiff AMY SHERLOCK

Set Number: One

PLEASE TAKE NOTICE that pursuant to California Code of Civil Procedure §§2031.210, *et. seq.*, you are requested to respond to the following Requests for Production, Set One, under oath within thirty (30) days of service hereof. You are further requested to identify and produce for inspection and copying, the documents in the below-numbered categories. The production shall take place at 10:00 a.m. at the Blake Law Firm, 533 2nd Street, Suite 250, Encinitas, CA 92024, within thirty (30) days from the date these requests are served.

If any document has been destroyed, lost, discarded, or misplaced, you must furnish a list identifying each such document, its date, author, addressee and each person to whom it was furnished, as well as a description of the circumstances under which the document was destroyed, lost, discarded or misplaced. Should you withhold any document on the basis of a claim of privilege, you must provide the following information with respect to each document withheld:

- (1) The date of the document;
- (2) The identity of the person(s) who authorized the document;
- (3) The identity of the persons(s) to whom the document was directed;
- (4) The substance of the document with sufficient particularity to enable the court and the parties to this action to identify the document;
- (5) The privilege asserted; and
- (6) The basis on which the privilege is claimed.

These Requests are continuing in nature. If, after responding to the Requests, you obtain additional responsive documents, you are required to produce all such subsequently acquired documents.

DEFINITIONS

1. The terms “DOCUMENT” and/or “DOCUMENTS” means any and all “writings,” as that term is defined in California Evidence Code §250 and California Code of Civil Procedure §2031.010 *et seq.*, including but not limited to any tangible items which contains handwriting,

1 typewriting, printing, photostatic reproduction, photographic reproduction, electronic reproduction,
2 and any other form of communications or representation whether produced, reproduced or stored on
3 paper, emails, text messages, cards, tapes, discs, belts, charts, films (including microfilm or
4 microfiche), computer storage devices or any other medium of recordation that are in YOUR
5 possession, custody or control, or the possession, custody or control of any of YOUR agents,
6 attorneys, representatives and anyone acting or purporting to act for or on their behalf.

7 2. The term “COMMUNICATION(S)” is used in the broadest sense, and includes but is
8 not limited to, any transmission or exchange of information between two or more persons, orally or
9 in writing, and includes any conversation or discussion, whether face-to-face or by means of a
10 telephone, telegraph, telex, telecopier, facsimile transmission, e-mail, text message, social media,
11 electronic, or other medium.

12 3. The terms “RELATING TO” and “RELATED TO” when used herein, shall mean and
13 refer to the following: including, in whole or in part, arising out of, comprising, embodying,
14 supporting, substantiating, containing, reflecting, memorializing, recording, constituting,
15 evidencing, setting forth, mentioning, concerning, discussing, describing, analyzing, studying,
16 reporting on, commenting on, identifying, noting, stating, considering, dealing with, pertaining to,
17 or referring to, in any manner.

18 4. The terms “PERSON” and “PERSONS” when used herein, mean and refer to a natural
19 person, firm, association, organization, partnership, business, trust, limited liability company,
20 corporation, or public entity.

21 5. The terms “YOU” and “YOUR” when used herein, mean and refer to Plaintiff AMY
22 SHERLOCK, and anyone acting or purporting to act on her behalf.

23 6. The term “LAKE” when used herein, means Defendant STEPHEN LAKE, and anyone
24 acting or purporting to act on his behalf.

25 7. The term “HARCOURT” when used herein, means Defendant BRADFORD
26 HARCOURT, and anyone acting or purporting to act on his behalf.

27 8. The term “BIKER” when used herein, means Michael “Biker” Sherlock, and anyone
28 acting or purporting to act on his behalf.

1 9. The term “FAC” when used herein, means and refers to the First Amended Complaint
2 filed by YOU against LAKE and others, on or about December 22, 2021, in the San Diego Superior
3 Court, as Case No. 37-2021-0050889-CU-AT-CTL.

4 10. The term “BALBOA PROPERTY” when used herein, means and refers to real property
5 commonly known as 8863 Balboa Avenue, Unit E, San Diego, California 92123, as defined in
6 footnote 4 of YOUR FAC.

7 11. The term “BALBOA CUP” when used herein, means and refers to the conditional use
8 permit purportedly issued in association with the BALBOA PROPERTY, as alleged in footnote 4 of
9 YOUR FAC.

10 12. The term “RAMONA PROPERTY” when used herein, means and refers to real property
11 commonly known as 1210 Olive Street, Ramona, CA 92065, as defined in footnote 3 of YOUR FAC.

12 13. The term “RAMONA CUP” when used herein, means and refers to the conditional use
13 permit purportedly issued in association with the RAMON PROPERTY, as alleged in footnote 3 of
14 YOUR FAC.

15 14. The term “ENTERPRISE” when used herein, means and refers to the “small group of
16 wealthy individuals and their agents that have conspired to create an unlawful monopoly in the
17 cannabis market in the City and County of San Diego,” as YOU allege in paragraph 1 of YOUR
18 FAC.

19 15. The term “SHERLOCK PARTNERSHIP” when used herein, means and refers to the
20 alleged partnership between BIKER, LAKE, and HARCOURT as asserted in paragraph 66 of YOUR
21 FAC.

22 16. The term “LERE” when used herein, means and refers to Leading Edge Real Estate,
23 LLC, as referenced in paragraph 69 of YOUR FAC.

24 17. The term “UP” when used herein, means and refers to United Patients Consumer
25 Cooperative, as referenced in paragraph 71 of YOUR FAC.

26 18. The term “SHERLOCK PROPERTY” when used herein, means and refers to BIKER’s
27 alleged interest in the “Partnership Agreement, LERE, and the Balboa and Ramona CUPs,” as stated
28 in paragraph 71 of YOUR FAC.

19. The term “HOA LITIGATION” when used herein, means and refers to the alleged lawsuit filed by the homeowners association of the BALBOA PROPERTY as alleged in paragraph 72 of YOUR FAC.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

Please produce all DOCUMENTS RELATED TO YOUR claim that LAKE was or is a part of the ENTERPRISE.

REQUEST FOR PRODUCTION NO. 2:

Please produce all COMMUNICATIONS RELATED TO YOUR claim that LAKE was or is a part of the ENTERPRISE.

REQUEST FOR PRODUCTION NO. 3:

Please produce all DOCUMENTS RELATED TO YOUR assertion that LAKE has numerous connections and relationships with principals and agents of the ENTERPRISE, as YOU assert in paragraph 39 of YOUR FAC.

REQUEST FOR PRODUCTION NO. 4:

Please produce the RAMONA CUP.

REQUEST FOR PRODUCTION NO. 5:

Please produce the BALBOA CUP.

REQUEST FOR PRODUCTION NO. 6:

Please produce all DOCUMENTS RELATED TO the RAMONA CUP, including but not limited to any applications, approvals, or transfer requests.

REQUEST FOR PRODUCTION NO. 7:

Please produce all COMMUNICATIONS RELATED TO the RAMONA CUP.

REQUEST FOR PRODUCTION NO. 8:

Please produce all DOCUMENTS RELATED TO the BALBOA CUP, including but not limited to any applications, approvals, or transfer requests.

REQUEST FOR PRODUCTION NO. 9:

Please produce all COMMUNICATIONS RELATED TO the BALBOA CUP.

REQUEST FOR PRODUCTION NO. 10:

Please produce all DOCUMENTS RELATED TO the SHERLOCK PARTNERSHIP.

REQUEST FOR PRODUCTION NO. 11:

Please produce all COMMUNICATIONS RELATED TO the SHERLOCK PARTNERSHIP.

REQUEST FOR PRODUCTION NO. 12:

Please produce all DOCUMENTS RELATED TO the RAMONA PROPERTY.

REQUEST FOR PRODUCTION NO. 13:

Please produce all COMMUNICATIONS RELATED TO the RAMONA PROPERTY.

REQUEST FOR PRODUCTION NO. 14:

Please produce all DOCUMENTS RELATED TO the BALBOA PROPERTY.

REQUEST FOR PRODUCTION NO. 15:

Please produce all COMMUNICATIONS RELATED TO the BALBOA PROPERTY.

REQUEST FOR PRODUCTION NO. 16:

Please produce all DOCUMENTS RELATED TO LERE.

REQUEST FOR PRODUCTION NO. 17:

Please produce all COMMUNICATIONS RELATED TO LERE.

REQUEST FOR PRODUCTION NO. 18:

Please produce all DOCUMENTS RELATED TO the SHERLOCK PROPERTY, including but not limited to any interest held by BIKER in any of the items comprising the SHERLOCK PROPERTY.

REQUEST FOR PRODUCTION NO. 19:

Please produce all COMMUNICATIONS RELATED TO the SHERLOCK PROPERTY.

REQUEST FOR PRODUCTION NO. 20:

Please produce all DOCUMENTS RELATED TO the HOA LITIGATION.

REQUEST FOR PRODUCTION NO. 21:

Please produce all COMMUNICATIONS RELATED TO the HOA LITIGATION.

REQUEST FOR PRODUCTION NO. 22:

1 Please produce all DOCUMENTS corroborating YOUR allegations in paragraphs 75 through
2 77 of YOUR FAC.

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

4 Please produce all DOCUMENTS corroborating YOUR allegation in paragraph 87 of YOUR
5 FAC.

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

7 Please produce all DOCUMENTS RELATED TO any handwriting reports, including the
8 report prepared on or about February 15, 2020 as alleged in paragraph 88 of YOUR FAC.

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

10 Please produce all COMMUNICATIONS RELATED TO any handwriting reports, including
11 the report prepared on or about February 15, 2020 as alleged in paragraph 88 of YOUR FAC.

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

13 Please produce all DOCUMENTS provided to any handwriting expert(s) in this case used to
14 prepare any handwriting reports.

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

16 Please produce all DOCUMENTS RELATED TO SHERLOCK's participation in the San
17 Diego cannabis market.

18 **REQUEST FOR PRODUCTION NO. 28:**

19 Please produce all COMMUNICATIONS RELATED TO SHERLOCK's participation in the
20 San Diego cannabis market.

21 **REQUEST FOR PRODUCTION NO. 29:**

22 Please produce all DOCUMENTS RELATED TO SHERLOCK's claim, if any, that LAKE
23 was a participant in the San Diego cannabis market.

24 **REQUEST FOR PRODUCTION NO. 30:**

25 Please produce all COMMUNICATIONS RELATED TO SHERLOCK's claim, if any, that
26 LAKE was a participant in the San Diego cannabis market.

27 **REQUEST FOR PRODUCTION NO. 31:**

28 Please produce all DOCUMENTS that demonstrate BIKER's ownership interest in each of the

1 items comprising the SHERLOCK PROPERTY.

2 **REQUEST FOR PRODUCTION NO. 32:**

3 Please produce all DOCUMENTS that demonstrate the Sherlock Family's ownership interest
4 in each of the items comprising the SHERLOCK PROPERTY, as alleged in paragraph 286 of YOUR
5 FAC.

6 **REQUEST FOR PRODUCTION NO. 33:**

7 Please produce all DOCUMENTS RELATED TO LAKE's alleged conversion of any of the
8 SHERLOCK PROPERTY.

9 **REQUEST FOR PRODUCTION NO. 34:**

10 Please produce all COMMUNICATIONS RELATED TO LAKE's alleged conversion of any
11 of the SHERLOCK PROPERTY.

12 **REQUEST FOR PRODUCTION NO. 35:**

13 Please produce all DOCUMENTS RELATED TO LAKE's alleged participation in any
14 conspiracy to convert the SHERLOCK PROPERTY.

15 **REQUEST FOR PRODUCTION NO. 36:**

16 Please produce all COMMUNICATIONS RELATED TO LAKE's alleged participation in any
17 conspiracy to convert the SHERLOCK PROPERTY.

18
19
20 Dated: July 26, 2022

BLAKE LAW FIRM

21
22 By: 

23 STEVEN W. BLAKE, ESQ.
24 ANDREW E. HALL, ESQ.
25 Attorneys for Defendant
26 STEPHEN LAKE
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