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8 *Attorneys for Plaintiff*

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
04/18/2018 at 09:44:00 AM
Clerk of the Superior Court
By Katelin O'Keefe, Deputy Clerk

9 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
10 **COUNTY OF SAN DIEGO**

11 **KARL BECK**, individually and on behalf of all
12 other similarly situated California residents,

13 Plaintiff,

14 v.

15 **POINT LOMA PATIENTS CONSUMER**
16 **COOPERATIVE CORPORATION**, A
17 California Corporation, **ADAM KNOPF**, an
18 Individual, **JUSTUS H. HENKES IV**, an
19 Individual, **419 CONSULTING INC.**, a
20 California Corporation, **GOLDEN STATE**
21 **GREENS LLC**, a California LLC, **FAR WEST**
22 **MANAGEMENT, LLC**, a California LLC,
23 **FAR WEST OPERATING, LLC**, a California
24 LLC, **FAR WEST STAFFING, LLC**, a
25 California LLC, and **DOES 1-50**,

26 Defendants.

Case No: 37-2017-00037524-CU-BT-CTL

CLASS ACTION

**DECLARATION OF WILLIAM R. RESTIS
IN SUPPORT OF PLAINTIFF'S MOTION
TO COMPEL REQUEST FOR
PRODUCTION (SET ONE)**

Date: May 18, 2018

Time: 9:00 a.m.

Judge: Hon. Joel R. Wohlfeil

Ctrm: C-73

1 I, William R. Restis, hereby declare as follows:

2 1. I am over the age of eighteen (18) and the managing member of The Restis Law Firm,
3 P.C. I have personal knowledge of the matters set forth herein, based on my active participation in
4 all material aspects of this litigation. If called upon, I could and would testify competently to the
5 facts herein based upon my personal involvement in this case. I submit this declaration in support
6 of Plaintiff Karl Beck's ("Plaintiff") Motion to Compel Requests for Production (Set One) to all
7 Defendants.

8 2. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff's Request for
9 Production of Documents (Set One) to Defendant Point Loma Patients Consumer Cooperative
10 Corporation ("PLPCC"), served on December 1, 2017.

11 3. Attached hereto as **Exhibits B and C** are true and correct copies of Plaintiff's Request
12 for Production of Documents (Set One) to Defendants Adam Knopf and Justus H. Henkes IV (the
13 "Individual Defendants"). The Requests are identical to both Defendants.

14 4. Attached hereto as **Exhibits D through H** are true and correct copies of Plaintiff's
15 Request for Production of Documents (Set One) to Defendants 419 Consulting Inc., Golden State
16 Greens LLC, Far West Management, LLC, Far West Operating, LLC, and Far West Staffing, LLC
17 (collectively, the "Shell Companies"). The Requests are identical to these Defendants.

18 5. Defendants requested, and Plaintiff granted, Defendants additional time until
19 February 5, 2018 to respond.

20 6. Attached hereto as **Exhibit I** is a true and correct copy of Defendant PLPCC's
21 Response to Request for Production of Documents (Set One).

22 7. Attached hereto as **Exhibits J and K** are true and correct copies of the Individual
23 Defendants' Response to Plaintiff's Request for Production of Documents (Set One). The responses
24 are identical to these Defendants.

1 the Court. Defendants' counsel stated they would provide such written response, but have not done
2 so.

3 I declare under penalty of perjury, under the laws of the State of California, that the foregoing
4 is true and correct to the best of my knowledge, information, and belief.

5 Executed on April 18, 2018, at San Diego, California.

6
7 /s/ William R. Restis
8 William R. Restis, Esq.
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EXHIBIT A

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7 william@restislaw.com

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

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11 **COUNTY OF SAN DIEGO**

12 **KARL BECK**, individually and on behalf of all
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14 Plaintiff,

15 v.

16 **POINT LOMA PATIENTS CONSUMER**
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18 California Corporation, **ADAM KNOPF**, an
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20 Individual, **419 CONSULTING INC.**, a
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25 LLC, **FAR WEST STAFFING, LLC**, a
26 California LLC, and **DOES 1-50**,

27 Defendants.

Case No. 37-2017-00037524-CU-BT-CTL

PLAINTIFF'S REQUEST FOR PRODUCTION
OF DOCUMENTS (SET ONE) TO POINT
LOMA PATIENTS CONSUMER
COOPERATIVE CORPORATION

[Code Civ. Pro. §§2031.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK
2 RESPONDING PARTY: Defendant POINT LOMA PATIENTS CONSUMER
3 COOPERATIVE CORPORATION
4 SET NUMBER: ONE (1)

5 Pursuant to Code of Civil Procedure §2031.010, Plaintiff hereby propounds Request for
6 Production of Documents (Set One) to Defendant Point Loma Patients Consumer Cooperative
7 Corporation, which shall answer the following requests, separately, fully and under oath, and in the
8 manner provided by the California Code of Civil Procedure and the terms set forth herein. The
9 documents requested herein include those documents in your possession, custody and/or control
10 and shall be produced for inspection and copying by Plaintiff’s counsel as those documents are kept
11 in the normal course of business at the location(s) where the documents responsive to these
12 Requests are kept, or at such other time or place or manner as the parties mutually agree in writing.

13 **I. INSTRUCTIONS**

14 In answering this discovery, you are required to produce all DOCUMENTS and DATA
15 responsive to these Requests below in your possession, custody or control or in the possession,
16 custody or control of your officers, employees, agents, representatives or attorneys. A
17 DOCUMENT or DATA is in your control if you have the right to obtain it from another person.

18 In interpreting this discovery, any word, words or language objected to as being “vague” or
19 “ambiguous” shall be defined in accordance with the definitions herein and alternatively, if such
20 word(s) are “vague” or “ambiguous” to you, the words shall be interpreted as defined in a standard
21 edition of Webster’s Dictionary. In each instance, state the objection and the corresponding
22 definition which you are applying.

23 If any DOCUMENT or DATA responsive to these Requests was at any time in your
24 possession or custody or subject to your control but now is no longer available for production, state
25 in writing whether the DOCUMENT or DATA:

- 26 (a) is missing or lost;

- 1 (b) has been destroyed;
- 2 (c) has been transferred or delivered to another person or entity and at whose request;
- 3 (d) has been otherwise disposed of; and
- 4 (e) in each instance, explain the circumstances surrounding the disposition of the
- 5 DOCUMENT or DATA and provide the date or approximate date of the DOCUMENT or DATA's
- 6 disposition.

7 If you claim that any DOCUMENT or DATA responsive to any of these Requests is

8 privileged or protected and you withhold a DOCUMENT or DATA or any portion of a

9 DOCUMENT or DATA on that basis, you must expressly make the claim and support the claim by

10 a description of the nature of the DOCUMENT or DATA, communications, or things not produced

11 that is sufficient to enable Plaintiff's counsel to evaluate and/or contest your claim. You are

12 requested to provide in writing with respect to each DOCUMENT or DATA to which you claim a

13 privilege applies, a full description of the claimed basis for the asserted privilege, including the

14 following information:

- 15 (a) the nature of the privilege you claim (i.e., attorney-client, work product);
- 16 (b) on whose behalf you are asserting the privilege;
- 17 (c) the facts upon which you rely as the basis for claiming the privilege;
- 18 (d) the title (if any) and the general subject matter of the DOCUMENT or DATA;
- 19 (e) the identity of each person who prepared or authored the DOCUMENT or DATA;
- 20 (f) the date the DOCUMENT or DATA was prepared and/or transmitted;
- 21 (g) the identity of each person (if any) who signed the DOCUMENT or DATA;
- 22 (h) the identity of each person to whom the DOCUMENT or DATA was directed,
- 23 circulated or shown;
- 24 (i) the identity of each person who has reviewed or seen the DOCUMENT or DATA;
- 25 and
- 26 (j) the identity of each person now in possession of the DOCUMENT or DATA.
- 27

1 If any portion of a DOCUMENT is responsive to any Request, then the entire DOCUMENT
2 must be produced. If the DOCUMENT contains privileged material, produce the entire
3 DOCUMENT with the privileged material redacted, the fact of redaction so indicated, and the basis
4 of the privilege asserted in your response.

5 If two or more identical duplicate copies of a DOCUMENT exist, the most legible copy
6 should be produced for purposes of these Requests.

7 Any DOCUMENT with any marks on any sheet or side thereof, including without
8 limitation, any initials, stamped indicia, comment or notation of any character, not a part of the
9 original text, or any reproduction thereof, is to be considered a separate DOCUMENT for purposes
10 of responding to any Request.

11 Responsive DOCUMENTS or DATA shall be produced in the manner in which they were
12 kept in the ordinary course of business. Responsive DOCUMENTS shall not be shuffled or
13 otherwise rearranged. DOCUMENTS that in their original condition are stapled, clipped, or
14 otherwise fastened together shall be produced in such form. If a DOCUMENT or group of
15 DOCUMENTS is taken from a file folder, file drawer, file box or notebook for transportation to a
16 central location for Plaintiff's review, please include a copy of the label from such container of the
17 DOCUMENTS.

18 Responsive DOCUMENTS or DATA shall be produced at the location as aforementioned in
19 a manner which is responsive to a particular Request. Upon producing the requested
20 DOCUMENTS or DATA, identify the Request(s) to which any DOCUMENT or DATA or group
21 of DOCUMENTS is responsive.

22 Upon producing the requested DOCUMENTS, you may mark the lower right-hand corner
23 of each page with Bates-stamped, consecutive numbers. Please do not allow the marks to obscure
24 any information on the DOCUMENT.

25 If there are no responsive DOCUMENTS or DATA with respect to a particular request or
26 part thereof please state so in writing.

1 **II. DEFINITIONS**

2 The following definitions apply to each of the requests for documents set forth herein and
3 are deemed to be incorporated in each said request:

4 “ACTION” means *Beck v. Point Loma Patients Consumer Cooperative Corporation et al.*,
5 Case Number 37-2017-00037524-CU-BT-CTL.

6 “COMMUNICATIONS” and words derivative means the act of communicating, including
7 every manner or means of disclosure, transfer, or exchange of information (in the form of facts,
8 ideas, inquiries, or otherwise), whether by document, facsimile, mail, personal delivery,
9 electronically or otherwise.

10 “COMPUTER” means all devices utilizing microchips to facilitate processing, analysis, or
11 storage of electronic information, including but not limited to desktop computers, laptop computers,
12 tablet computers, smartphones, notebook computers, smart watches, and palmtop computers (also
13 known as personal digital assistants or PDA’s).

14 “DOCUMENT(S)” is defined in the manner described by California Evidence Code § 250,
15 and is used in the broadest possible sense to include all tangible items where information is stored
16 or likely to be stored, including information or DATA recorded in any medium, whether written,
17 printed, typed, photostatic, photographed, recorded, stored on a COMPUTER or other electronic
18 form, whether comprised of letters, numbers, graphics, sound or video, whether in original, draft,
19 revision, or non-identical format (i.e., whether different from another document by reason of the
20 time of its creation, whether contemporaneously or subsequently created, or whether different from
21 another document by reason of the notations, marks or other unique characteristics), whether a
22 translation, dictation or reference to an event, whether by handwriting, typewriting, or mimeograph,
23 whether in hard document, recorded or computer R form, including COMPUTER printouts and
24 computer DATA or files, including DATA stored on ZIP or USB drives, external or internal hard
25 drives, compact discs, or other COMPUTER storage devices of any form whatsoever, and including
26 but not limited to all electronic mail (e-mail) and any instant messenger, Slack (type) channel or
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1 similar, and including any DATA, writings, correspondence, letters, agreements, contracts,
2 memoranda, reports, calendars, date books, checks, invoices, billing statement, notebooks, notes,
3 journals, accountings, ledgers, presentations, manuals, publications, brochures, designs, proposals,
4 and whether privileged or otherwise excluded from discovery.

5 “ELECTRONIC DATA” or “DATA” means the original (or identical duplicate when the
6 original is not available), and any non-identical copies (whether non-identical because of notes
7 made on copies or attached comments, annotations, marks, transmission notations, or highlighting
8 of any kind) of DOCUMENTS of every kind and description whether inscribed by mechanical,
9 facsimile, electronic, magnetic, digital, analogy, or other means. ELECTRONIC DATA and
10 DATA includes, by way of example only, computer programs (whether private, commercial, or
11 work-in-progress), programming notes or instructions, activity listings of electronic mail
12 transmittals and/or receipts, output resulting from the use of any software program, including work
13 processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail,
14 operating systems, sources code of all types, peripheral drivers, portable document format (PDF)
15 files, batch files, ASCII files, and any and all miscellaneous files and/or file fragments, regardless
16 of the media on which they reside and regardless of whether said electronic data consists in an
17 active file, deleted file, or file fragment. ELECTRONIC DATA and DATA also include any and
18 all items stored on computer memories, hard drives, CD-ROMs, CD-R, CD-RW, DVD, Blu-ray, M-
19 Disc, removable media such as Zip disks, flash memory, USB drives, and their equivalent,
20 computer chips, including, but not limited to EDROM, PROM, RAM and ROM, on or in any other
21 vehicle for digital data storage and/or transmittal, including cloud or remote storage such as
22 Dropbox, Google Drive, OneDrive, iCloud, Evernote, and similar. The term ELECTRONIC
23 DATA and DATA also include the file, folder tabs and/or containers and labels appended to, or
24 associated with, any physical storage device associated with each original and/or copy.

25 “MEDICAL MARIJUANA” means cannabis or marijuana, and any derivative or product
26 derived therefrom, including any product containing tetrahydrocannabinol (THC) or cannabidiol
27

1 (CBD), including but not limited to, cannabis flowers, cannabis infused edibles and beverages, hash
2 oil, tinctures, concentrates, cartridges and topical cannabis such as creams, ointments, and patches.

3 “REFER(S)/(ING)” means to have as a subject of a DOCUMENT or ELECTRONIC
4 DATA the nature of the matter requested or to otherwise identify, analyze or concern the matter
5 requested. To be responsive, the subject matter of the DOCUMENT or ELECTRONIC DATA
6 requested need not be the exclusive subject, but rather, concerning the information requested.

7 “RELATE(S)/(ING)” means, without limitation, identifying, describing, discussing,
8 assessing, stating, reflecting, concerning, constituting, containing, embodying, or evidencing in any
9 way, whether directly or indirectly, the particular subject matter identified.

10 “YOU”, “YOUR,” and “PLPCCC” mean Defendant Point Loma Patients Consumer
11 Cooperative Corporation, the responding party to whom this discovery is directed, and includes any
12 present or former company that YOU have acquired, and any local, regional, national, and
13 executive offices, divisions, or subsidiaries, and all present and former directors, officers, partners,
14 executive personnel, managers, agents or employees, including their accountants, attorneys, bankers
15 and advisors acting or purporting to act on the entity’s behalf.

16 **III. RULES OF CONSTRUCTION**

17 The following rules of construction shall apply:

- 18 1. The use of the singular form of any word shall be deemed to include the plural and
19 vice versa;
- 20 2. The use of the present tense includes the past tense and vice versa;
- 21 3. The terms “any,” “all,” “each” and “every” should be understood in either their
22 most or least inclusive sense as necessary to bring within the scope of the discovery request all
23 responses that might otherwise be construed to be outside of their scope, and the term “any” is
24 particularly defined to mean each and every.
- 25 4. The use of one gender shall include all others, including masculine, feminine and
26 neutral genders, as appropriate in the context; and

1 5. The connections “and” and “or” shall be construed either disjunctively or conjunctively as
2 necessary to bring within the scope of the discovery request all responses that might otherwise be
3 construed to be outside their scope.

4 **IV. RELEVANT TIME PERIOD**

5 The Relevant Time Period is the period June 2014 to present, unless otherwise specifically
6 indicated, and shall include all information that relate to such period even though prepared,
7 published or disseminated outside of such time period.

8 **V. REQUESTS FOR PRODUCTION**

9 REQUEST NO. 1:

10 An export list containing the names and addresses of all members of the PLPCCC since
11 January 1, 2015.

12 REQUEST NO. 2:

13 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
14 that REFER or RELATE to Sinner Brothers, Inc. and/or Justus H. Henkes IV, Inc.

15 REQUEST NO. 3:

16 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
17 that REFER or RELATE to YOUR Articles of Incorporation and amendments thereto, all bylaws
18 and amendments thereto, and all meeting minutes.

19 REQUEST NO. 4:

20 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
21 that REFER or RELATE to any contracts or agreements, formal or informal, between or among
22 YOU and any defendant in this ACTION.

23 REQUEST NO. 5:

24 All COMMUNICATIONS with, including, by or between, any defendant in this ACTION.
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1 REQUEST NO. 6:

2 All COMMUNICATIONS with, including, by or between, any natural or legal person
3 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport, distribution,
4 sale, purchase, and/or financing of MEDICAL MARIJUANA.

5 REQUEST NO. 7:

6 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
7 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for, cash.
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12 DATED: December 1, 2017

Respectfully submitted,

13 THE RESTIS LAW FIRM, P.C.

14
15 
16 William Restis, Esq.
17 550 West C Street, Suite 1760
18 San Diego, CA 92101
19 Tel: +1.619.270.8383
20 Email: william@restislaw.com
21 ATTORNEYS FOR PLAINTIFFS

22 FINKELSTEIN & KRINSK LLP
23 Jeffrey R. Krinsk, Esq. (SBN 109234)
24 jrk@classactionlaw.com
25 550 West C St., Suite 1760
26 San Diego, California 92101
27 Telephone: (619) 238-1333
28 Facsimile: (619) 238-5425

EXHIBIT B

1 THE RESTIS LAW FIRM, P.C.
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8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

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27 Defendants.

Case No. 37-2017-00037524-CU-BT-CTL

PLAINTIFF'S REQUEST FOR PRODUCTION
OF DOCUMENTS (SET ONE) TO
DEFENDANT ADAM KNOPF

[Code Civ. Pro. §§2031.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK

2 RESPONDING PARTY: Defendant ADAM KNOPF

3 SET NUMBER: ONE (1)

4 Pursuant to Code of Civil Procedure §2031.010, Plaintiff hereby propounds Request for
5 Production of Documents (Set One) to Defendant Adam Knopf, which shall answer the following
6 requests, separately, fully and under oath, and in the manner provided by the California Code of
7 Civil Procedure and the terms set forth herein. The documents requested herein include those
8 documents in your possession, custody and/or control and shall be produced for inspection and
9 copying by Plaintiff's counsel as those documents are kept in the normal course of business at the
10 location(s) where the documents responsive to these Requests are kept, or at such other time or
11 place or manner as the parties mutually agree in writing.

12 **I. INSTRUCTIONS**

13 In answering this discovery, you are required to produce all DOCUMENTS and DATA
14 responsive to these Requests below in your possession, custody or control or in the possession,
15 custody or control of your officers, employees, agents, representatives or attorneys. A
16 DOCUMENT or DATA is in your control if you have the right to obtain it from another person.

17 In interpreting this discovery, any word, words or language objected to as being "vague" or
18 "ambiguous" shall be defined in accordance with the definitions herein and alternatively, if such
19 word(s) are "vague" or "ambiguous" to you, the words shall be interpreted as defined in a standard
20 edition of Webster's Dictionary. In each instance, state the objection and the corresponding
21 definition which you are applying.

22 If any DOCUMENT or DATA responsive to these Requests was at any time in your
23 possession or custody or subject to your control but now is no longer available for production, state
24 in writing whether the DOCUMENT or DATA:

25 (a) is missing or lost;

26 (b) has been destroyed;

1 (c) has been transferred or delivered to another person or entity and at whose request;
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3 (e) in each instance, explain the circumstances surrounding the disposition of the
4 DOCUMENT or DATA and provide the date or approximate date of the DOCUMENT or DATA's
5 disposition.

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7 privileged or protected and you withhold a DOCUMENT or DATA or any portion of a
8 DOCUMENT or DATA on that basis, you must expressly make the claim and support the claim by
9 a description of the nature of the DOCUMENT or DATA, communications, or things not produced
10 that is sufficient to enable Plaintiff's counsel to evaluate and/or contest your claim. You are
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12 privilege applies, a full description of the claimed basis for the asserted privilege, including the
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- 14 (a) the nature of the privilege you claim (i.e., attorney-client, work product);
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- 18 (e) the identity of each person who prepared or authored the DOCUMENT or DATA;
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- 20 (g) the identity of each person (if any) who signed the DOCUMENT or DATA;
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22 circulated or shown;
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- 25 (j) the identity of each person now in possession of the DOCUMENT or DATA.

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3 DOCUMENT with the privileged material redacted, the fact of redaction so indicated, and the basis
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19 a manner which is responsive to a particular Request. Upon producing the requested
20 DOCUMENTS or DATA, identify the Request(s) to which any DOCUMENT or DATA or group
21 of DOCUMENTS is responsive.

22 Upon producing the requested DOCUMENTS, you may mark the lower right-hand corner
23 of each page with Bates-stamped, consecutive numbers. Please do not allow the marks to obscure
24 any information on the DOCUMENT.

25 If there are no responsive DOCUMENTS or DATA with respect to a particular request or
26 part thereof please state so in writing.

1 **II. DEFINITIONS**

2 The following definitions apply to each of the requests for documents set forth herein and
3 are deemed to be incorporated in each said request:

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5 Case Number 37-2017-00037524-CU-BT-CTL.

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7 every manner or means of disclosure, transfer, or exchange of information (in the form of facts,
8 ideas, inquiries, or otherwise), whether orally or by document, facsimile, mail, personal delivery,
9 electronically or otherwise.

10 “COMPUTER” means all devices utilizing microchips to facilitate processing, analysis, or
11 storage of electronic information, including but not limited to desktop computers, laptop computers,
12 tablet computers, smartphones, notebook computers, smart watches, and palmtop computers (also
13 known as personal digital assistants or PDA’s).

14 “DOCUMENT(S)” is defined in the manner described by California Evidence Code § 250,
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21 another document by reason of the notations, marks or other unique characteristics), whether a
22 translation, dictation or reference to an event, whether by handwriting, typewriting, or mimeograph,
23 whether in hard document, recorded or computer R form, including COMPUTER printouts and
24 computer DATA or files, including DATA stored on ZIP or USB drives, external or internal hard
25 drives, compact discs, or other COMPUTER storage devices of any form whatsoever, and including
26 but not limited to all electronic mail (e-mail) and any instant messenger, Slack (type) channel or
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1 similar, and including any DATA, writings, correspondence, letters, agreements, contracts,
2 memoranda, reports, calendars, date books, checks, invoices, billing statement, notebooks, notes,
3 journals, accountings, ledgers, presentations, manuals, publications, brochures, designs, proposals,
4 and whether privileged or otherwise excluded from discovery.

5 “ELECTRONIC DATA” or “DATA” means the original (or identical duplicate when the
6 original is not available), and any non-identical copies (whether non-identical because of notes
7 made on copies or attached comments, annotations, marks, transmission notations, or highlighting
8 of any kind) of DOCUMENTS of every kind and description whether inscribed by mechanical,
9 facsimile, electronic, magnetic, digital, analogy, or other means. ELECTRONIC DATA and
10 DATA includes, by way of example only, computer programs (whether private, commercial, or
11 work-in-progress), programming notes or instructions, activity listings of electronic mail
12 transmittals and/or receipts, output resulting from the use of any software program, including work
13 processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail,
14 operating systems, sources code of all types, peripheral drivers, portable document format (PDF)
15 files, batch files, ASCII files, and any and all miscellaneous files and/or file fragments, regardless
16 of the media on which they reside and regardless of whether said electronic data consists in an
17 active file, deleted file, or file fragment. ELECTRONIC DATA and DATA also include any and
18 all items stored on computer memories, hard drives, CD-ROMs, CD-R, CD-RW, DVD, Blu-ray, M-
19 Disc, removable media such as Zip disks, flash memory, USB drives, and their equivalent,
20 computer chips, including, but not limited to EDROM, PROM, RAM and ROM, on or in any other
21 vehicle for digital data storage and/or transmittal, including cloud or remote storage such as
22 Dropbox, Google Drive, OneDrive, iCloud, Evernote, and similar. The term ELECTRONIC
23 DATA and DATA also include the file, folder tabs and/or containers and labels appended to, or
24 associated with, any physical storage device associated with each original and/or copy.

25 “MEDICAL MARIJUANA” means cannabis or marijuana, and any derivative or product
26 derived therefrom, including any product containing tetrahydrocannabinol (THC) or cannabidiol
27

1 (CBD), including but not limited to, cannabis flowers, cannabis infused edibles and beverages, hash
2 oil, tinctures, concentrates, cartridges and topical cannabis such as creams, ointments, and patches.

3 “REFER(S)/(ING)” means to have as a subject of a DOCUMENT or ELECTRONIC DATA
4 the nature of the matter requested or to otherwise identify, analyze or concern the matter requested.
5 To be responsive, the subject matter of the DOCUMENT or ELECTRONIC DATA requested need
6 not be the exclusive subject, but rather, concerning the information requested.

7 “RELATE(S)/(ING)” means, without limitation, identifying, describing, discussing,
8 assessing, stating, reflecting, concerning, constituting, containing, embodying, or evidencing in any
9 way, whether directly or indirectly, the particular subject matter identified.

10 “YOU” and “YOUR” mean Defendant Adam Knopf, the responding party to whom this
11 discovery is directed, and all present and former agents or employees, including accountants,
12 attorneys, bankers and advisors acting or purporting to act on YOUR behalf.

13 **III. RULES OF CONSTRUCTION**

14 The following rules of construction shall apply:

15 1. The use of the singular form of any word shall be deemed to include the plural and
16 vice versa;

17 2. The use of the present tense includes the past tense and vice versa;

18 3. The terms “any,” “all,” “each” and “every” should be understood in either their
19 most or least inclusive sense as necessary to bring within the scope of the discovery request all
20 responses that might otherwise be construed to be outside of their scope, and the term “any” is
21 particularly defined to mean each and every.

22 4. The use of one gender shall include all others, including masculine, feminine and
23 neutral genders, as appropriate in the context; and

24 5. The connections “and” and “or” shall be construed either disjunctively or
25 conjunctively as necessary to bring within the scope of the discovery request all responses that
26 might otherwise be construed to be outside their scope.

1 **IV. RELEVANT TIME PERIOD**

2 The Relevant Time Period is the period June 2014 to present, unless otherwise specifically
3 indicated, and shall include all information that relate to such period even though prepared,
4 published or disseminated outside of such time period.

5 **V. REQUESTS FOR PRODUCTION**

6 REQUEST NO. 1:

7 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
8 that REFER or RELATE to any contracts or agreements, formal or informal, between or among
9 YOU and any defendant in this ACTION.

10 REQUEST NO. 2:

11 All DOCUMENTS and DATA (including electronic mail and other
12 COMMUNICATIONS) that REFER or RELATE to YOUR tax returns.

13 REQUEST NO. 3:

14 All of YOUR bank statements.

15 REQUEST NO. 4:

16 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
17 that REFER or RELATE to YOUR expenses RELATING to MEDICAL MARIJUANA, including
18 but not limited to rent, utilities, insurance, fees, wages, taxes, interest, supplies, maintenance, travel,
19 meals and entertainment, and training.

20 REQUEST NO. 5:

21 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
22 that REFER or RELATE to any salary, wage, compensation, pay, remuneration, emolument,
23 benefit, kick-back, gift, donation or other transfer of value with, including, by or between, YOU
24 and any defendant in this ACTION.

1 REQUEST NO. 6:

2 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
3 that REFER or RELATE to any salary, wage, compensation, pay, remuneration, emolument,
4 benefit, kick-back, gift, donation or other transfer of value with, including, by or between, YOU
5 and any natural or legal person involved in the cultivation, growth, production, refinement, transfer,
6 carry, transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

7 REQUEST NO. 7:

8 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
9 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for, cash.

10 REQUEST NO. 8:

11 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
12 that REFER or RELATE to the cultivation, growth, production, refinement, transfer, carry,
13 transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

14 REQUEST NO. 9:

15 All COMMUNICATIONS with, including, by or between, any defendant in this ACTION.

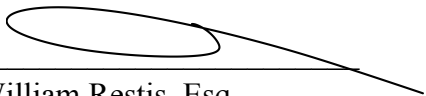
16 REQUEST NO. 10:

17 All COMMUNICATIONS with, including, by or between, any natural or legal person
18 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport, distribution,
19 sale, purchase, and/or financing of MEDICAL MARIJUANA.

20 DATED: December 1, 2017

21 Respectfully submitted,

22 THE RESTIS LAW FIRM, P.C.

23
24 
25 William Restis, Esq.
26 550 West C Street, Suite 1760
27 San Diego, CA 92101

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EXHIBIT C

1 THE RESTIS LAW FIRM, P.C.
2 William R. Restis, Esq. (SBN 246823)
3 550 West C Street, Suite 1760
4 San Diego, California 92101
5 Tel: +1.619.270.8383
6 Fax: +1.619.752.1552
7 william@restislaw.com

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
11 **COUNTY OF SAN DIEGO**

12 **KARL BECK**, individually and on behalf of all
13 other similarly situated California residents,

14 Plaintiff,

15 v.

16 **POINT LOMA PATIENTS CONSUMER**
17 **COOPERATIVE CORPORATION**, A
18 California Corporation, **ADAM KNOPF**, an
19 Individual, **JUSTUS H. HENKES IV**, an
20 Individual, **419 CONSULTING INC.**, a
21 California Corporation, **GOLDEN STATE**
22 **GREENS LLC**, a California LLC, **FAR WEST**
23 **MANAGEMENT, LLC**, a California LLC,
24 **FAR WEST OPERATING, LLC**, a California
25 LLC, **FAR WEST STAFFING, LLC**, a
26 California LLC, and **DOES 1-50**,

27 Defendants.

Case No. 37-2017-00037524-CU-BT-CTL

PLAINTIFF'S REQUEST FOR PRODUCTION
OF DOCUMENTS (SET ONE) TO
DEFENDANT JUSTUS H. HENKES IV

[Code Civ. Pro. §§2031.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK
2 RESPONDING PARTY: Defendant JUSTUS H. HENKES IV
3 SET NUMBER: ONE (1)

4 Pursuant to Code of Civil Procedure §2031.010, Plaintiff hereby propounds Request for
5 Production of Documents (Set One) to Defendant Justus H. Henkes IV, which shall answer the
6 following requests, separately, fully and under oath, and in the manner provided by the California
7 Code of Civil Procedure and the terms set forth herein. The documents requested herein include
8 those documents in your possession, custody and/or control and shall be produced for inspection
9 and copying by Plaintiff's counsel as those documents are kept in the normal course of business at
10 the location(s) where the documents responsive to these Requests are kept, or at such other time or
11 place or manner as the parties mutually agree in writing.

12 **I. INSTRUCTIONS**

13 In answering this discovery, you are required to produce all DOCUMENTS and DATA
14 responsive to these Requests below in your possession, custody or control or in the possession,
15 custody or control of your officers, employees, agents, representatives or attorneys. A
16 DOCUMENT or DATA is in your control if you have the right to obtain it from another person.

17 In interpreting this discovery, any word, words or language objected to as being "vague" or
18 "ambiguous" shall be defined in accordance with the definitions herein and alternatively, if such
19 word(s) are "vague" or "ambiguous" to you, the words shall be interpreted as defined in a standard
20 edition of Webster's Dictionary. In each instance, state the objection and the corresponding
21 definition which you are applying.

22 If any DOCUMENT or DATA responsive to these Requests was at any time in your
23 possession or custody or subject to your control but now is no longer available for production, state
24 in writing whether the DOCUMENT or DATA:

- 25 (a) is missing or lost;
26 (b) has been destroyed;

1 (c) has been transferred or delivered to another person or entity and at whose request;
2 (d) has been otherwise disposed of; and
3 (e) in each instance, explain the circumstances surrounding the disposition of the
4 DOCUMENT or DATA and provide the date or approximate date of the DOCUMENT or DATA's
5 disposition.

6 If you claim that any DOCUMENT or DATA responsive to any of these Requests is
7 privileged or protected and you withhold a DOCUMENT or DATA or any portion of a
8 DOCUMENT or DATA on that basis, you must expressly make the claim and support the claim by
9 a description of the nature of the DOCUMENT or DATA, communications, or things not produced
10 that is sufficient to enable Plaintiff's counsel to evaluate and/or contest your claim. You are
11 requested to provide in writing with respect to each DOCUMENT or DATA to which you claim a
12 privilege applies, a full description of the claimed basis for the asserted privilege, including the
13 following information:

- 14 (a) the nature of the privilege you claim (i.e., attorney-client, work product);
- 15 (b) on whose behalf you are asserting the privilege;
- 16 (c) the facts upon which you rely as the basis for claiming the privilege;
- 17 (d) the title (if any) and the general subject matter of the DOCUMENT or DATA;
- 18 (e) the identity of each person who prepared or authored the DOCUMENT or DATA;
- 19 (f) the date the DOCUMENT or DATA was prepared and/or transmitted;
- 20 (g) the identity of each person (if any) who signed the DOCUMENT or DATA;
- 21 (h) the identity of each person to whom the DOCUMENT or DATA was directed,
22 circulated or shown;
- 23 (i) the identity of each person who has reviewed or seen the DOCUMENT or DATA;
- 24 and
- 25 (j) the identity of each person now in possession of the DOCUMENT or DATA.

1 If any portion of a DOCUMENT is responsive to any Request, then the entire DOCUMENT
2 must be produced. If the DOCUMENT contains privileged material, produce the entire
3 DOCUMENT with the privileged material redacted, the fact of redaction so indicated, and the basis
4 of the privilege asserted in your response.

5 If two or more identical duplicate copies of a DOCUMENT exist, the most legible copy
6 should be produced for purposes of these Requests.

7 Any DOCUMENT with any marks on any sheet or side thereof, including without
8 limitation, any initials, stamped indicia, comment or notation of any character, not a part of the
9 original text, or any reproduction thereof, is to be considered a separate DOCUMENT for purposes
10 of responding to any Request.

11 Responsive DOCUMENTS or DATA shall be produced in the manner in which they were
12 kept in the ordinary course of business. Responsive DOCUMENTS shall not be shuffled or
13 otherwise rearranged. DOCUMENTS that in their original condition are stapled, clipped, or
14 otherwise fastened together shall be produced in such form. If a DOCUMENT or group of
15 DOCUMENTS is taken from a file folder, file drawer, file box or notebook for transportation to a
16 central location for Plaintiff's review, please include a copy of the label from such container of the
17 DOCUMENTS.

18 Responsive DOCUMENTS or DATA shall be produced at the location as aforementioned in
19 a manner which is responsive to a particular Request. Upon producing the requested
20 DOCUMENTS or DATA, identify the Request(s) to which any DOCUMENT or DATA or group
21 of DOCUMENTS is responsive.

22 Upon producing the requested DOCUMENTS, you may mark the lower right-hand corner
23 of each page with Bates-stamped, consecutive numbers. Please do not allow the marks to obscure
24 any information on the DOCUMENT.

25 If there are no responsive DOCUMENTS or DATA with respect to a particular request or
26 part thereof please state so in writing.

1 **II. DEFINITIONS**

2 The following definitions apply to each of the requests for documents set forth herein and
3 are deemed to be incorporated in each said request:

4 “ACTION” means *Beck v. Point Loma Patients Consumer Cooperative Corporation et al.*,
5 Case Number 37-2017-00037524-CU-BT-CTL.

6 “COMMUNICATIONS” and words derivative means the act of communicating, including
7 every manner or means of disclosure, transfer, or exchange of information (in the form of facts,
8 ideas, inquiries, or otherwise), whether orally or by document, facsimile, mail, personal delivery,
9 electronically or otherwise.

10 “COMPUTER” means all devices utilizing microchips to facilitate processing, analysis, or
11 storage of electronic information, including but not limited to desktop computers, laptop computers,
12 tablet computers, smartphones, notebook computers, smart watches, and palmtop computers (also
13 known as personal digital assistants or PDA’s).

14 “DOCUMENT(S)” is defined in the manner described by California Evidence Code § 250,
15 and is used in the broadest possible sense to include all tangible items where information is stored
16 or likely to be stored, including information or DATA recorded in any medium, whether written,
17 printed, typed, photostatic, photographed, recorded, stored on a COMPUTER or other electronic
18 form, whether comprised of letters, numbers, graphics, sound or video, whether in original, draft,
19 revision, or non-identical format (i.e., whether different from another document by reason of the
20 time of its creation, whether contemporaneously or subsequently created, or whether different from
21 another document by reason of the notations, marks or other unique characteristics), whether a
22 translation, dictation or reference to an event, whether by handwriting, typewriting, or mimeograph,
23 whether in hard document, recorded or computer R form, including COMPUTER printouts and
24 computer DATA or files, including DATA stored on ZIP or USB drives, external or internal hard
25 drives, compact discs, or other COMPUTER storage devices of any form whatsoever, and including
26 but not limited to all electronic mail (e-mail) and any instant messenger, Slack (type) channel or
27

1 similar, and including any DATA, writings, correspondence, letters, agreements, contracts,
2 memoranda, reports, calendars, date books, checks, invoices, billing statement, notebooks, notes,
3 journals, accountings, ledgers, presentations, manuals, publications, brochures, designs, proposals,
4 and whether privileged or otherwise excluded from discovery.

5 “ELECTRONIC DATA” or “DATA” means the original (or identical duplicate when the
6 original is not available), and any non-identical copies (whether non-identical because of notes
7 made on copies or attached comments, annotations, marks, transmission notations, or highlighting
8 of any kind) of DOCUMENTS of every kind and description whether inscribed by mechanical,
9 facsimile, electronic, magnetic, digital, analogy, or other means. ELECTRONIC DATA and
10 DATA includes, by way of example only, computer programs (whether private, commercial, or
11 work-in-progress), programming notes or instructions, activity listings of electronic mail
12 transmittals and/or receipts, output resulting from the use of any software program, including work
13 processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail,
14 operating systems, sources code of all types, peripheral drivers, portable document format (PDF)
15 files, batch files, ASCII files, and any and all miscellaneous files and/or file fragments, regardless
16 of the media on which they reside and regardless of whether said electronic data consists in an
17 active file, deleted file, or file fragment. ELECTRONIC DATA and DATA also include any and
18 all items stored on computer memories, hard drives, CD-ROMs, CD-R, CD-RW, DVD, Blu-ray, M-
19 Disc, removable media such as Zip disks, flash memory, USB drives, and their equivalent,
20 computer chips, including, but not limited to EDROM, PROM, RAM and ROM, on or in any other
21 vehicle for digital data storage and/or transmittal, including cloud or remote storage such as
22 Dropbox, Google Drive, OneDrive, iCloud, Evernote, and similar. The term ELECTRONIC
23 DATA and DATA also include the file, folder tabs and/or containers and labels appended to, or
24 associated with, any physical storage device associated with each original and/or copy.

25 “MEDICAL MARIJUANA” means cannabis or marijuana, and any derivative or product
26 derived therefrom, including any product containing tetrahydrocannabinol (THC) or cannabidiol
27

1 (CBD), including but not limited to, cannabis flowers, cannabis infused edibles and beverages, hash
2 oil, tinctures, concentrates, cartridges and topical cannabis such as creams, ointments, and patches.

3 “REFER(S)/(ING)” means to have as a subject of a DOCUMENT or ELECTRONIC DATA
4 the nature of the matter requested or to otherwise identify, analyze or concern the matter requested.
5 To be responsive, the subject matter of the DOCUMENT or ELECTRONIC DATA requested need
6 not be the exclusive subject, but rather, concerning the information requested.

7 “RELATE(S)/(ING)” means, without limitation, identifying, describing, discussing,
8 assessing, stating, reflecting, concerning, constituting, containing, embodying, or evidencing in any
9 way, whether directly or indirectly, the particular subject matter identified.

10 “YOU” and “YOUR” mean Defendant Justus H. Henkes IV, the responding party to whom
11 this discovery is directed, and all present and former agents or employees, including accountants,
12 attorneys, bankers and advisors acting or purporting to act on YOUR behalf.

13 **III. RULES OF CONSTRUCTION**

14 The following rules of construction shall apply:

15 1. The use of the singular form of any word shall be deemed to include the plural and
16 vice versa;

17 2. The use of the present tense includes the past tense and vice versa;

18 3. The terms “any,” “all,” “each” and “every” should be understood in either their
19 most or least inclusive sense as necessary to bring within the scope of the discovery request all
20 responses that might otherwise be construed to be outside of their scope, and the term “any” is
21 particularly defined to mean each and every.

22 4. The use of one gender shall include all others, including masculine, feminine and
23 neutral genders, as appropriate in the context; and

24 5. The connections “and” and “or” shall be construed either disjunctively or
25 conjunctively as necessary to bring within the scope of the discovery request all responses that
26 might otherwise be construed to be outside their scope.

1 **IV. RELEVANT TIME PERIOD**

2 The Relevant Time Period is the period June 2014 to present, unless otherwise specifically
3 indicated, and shall include all information that relate to such period even though prepared,
4 published or disseminated outside of such time period.

5 **V. REQUESTS FOR PRODUCTION**

6 REQUEST NO. 1:

7 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
8 that REFER or RELATE to any contracts or agreements, formal or informal, between or among
9 YOU and any defendant in this ACTION.

10 REQUEST NO. 2:

11 All DOCUMENTS and DATA (including electronic mail and other
12 COMMUNICATIONS) that REFER or RELATE to YOUR tax returns.

13 REQUEST NO. 3:

14 All of YOUR bank statements.

15 REQUEST NO. 4:

16 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
17 that REFER or RELATE to YOUR expenses RELATING to MEDICAL MARIJUANA, including
18 but not limited to rent, utilities, insurance, fees, wages, taxes, interest, supplies, maintenance, travel,
19 meals and entertainment, and training.

20 REQUEST NO. 5:

21 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
22 that REFER or RELATE to any salary, wage, compensation, pay, remuneration, emolument,
23 benefit, kick-back, gift, donation or other transfer of value with, including, by or between, YOU
24 and any defendant in this ACTION.

1 REQUEST NO. 6:

2 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
3 that REFER or RELATE to any salary, wage, compensation, pay, remuneration, emolument,
4 benefit, kick-back, gift, donation or other transfer of value with, including, by or between, YOU
5 and any natural or legal person involved in the cultivation, growth, production, refinement, transfer,
6 carry, transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

7 REQUEST NO. 7:

8 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
9 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for, cash.

10 REQUEST NO. 8:

11 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
12 that REFER or RELATE to the cultivation, growth, production, refinement, transfer, carry,
13 transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

14 REQUEST NO. 9:

15 All COMMUNICATIONS with, including, by or between, any defendant in this ACTION.

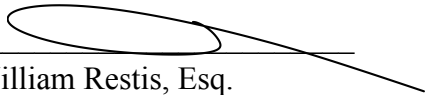
16 REQUEST NO. 10:

17 All COMMUNICATIONS with, including, by or between, any natural or legal person
18 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport, distribution,
19 sale, purchase, and/or financing of MEDICAL MARIJUANA.

20
21 DATED: December 1, 2017

Respectfully submitted,

22
23 THE RESTIS LAW FIRM, P.C.

24 
25 William Restis, Esq.
26 550 West C Street, Suite 1760
27 San Diego, CA 92101

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EXHIBIT D

1 THE RESTIS LAW FIRM, P.C.
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7 william@restislaw.com

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
11 **COUNTY OF SAN DIEGO**

12 **KARL BECK**, individually and on behalf of all
13 other similarly situated California residents,

14 Plaintiff,

15 v.

16 **POINT LOMA PATIENTS CONSUMER**
17 **COOPERATIVE CORPORATION**, A
18 California Corporation, **ADAM KNOPF**, an
19 Individual, **JUSTUS H. HENKES IV**, an
20 Individual, **419 CONSULTING INC.**, a
21 California Corporation, **GOLDEN STATE**
22 **GREENS LLC**, a California LLC, **FAR WEST**
23 **MANAGEMENT, LLC**, a California LLC,
24 **FAR WEST OPERATING, LLC**, a California
25 LLC, **FAR WEST STAFFING, LLC**, a
26 California LLC, and **DOES 1-50**,

27 Defendants.

Case No. 37-2017-00037524-CU-BT-CTL

PLAINTIFF'S REQUEST FOR PRODUCTION
OF DOCUMENTS (SET ONE) TO
DEFENDANT 419 CONSULTING INC.

[Code Civ. Pro. §§2031.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK

2 RESPONDING PARTY: Defendant 419 CONSULTING INC.

3 SET NUMBER: ONE (1)

4 Pursuant to Code of Civil Procedure §2031.010, Plaintiff hereby propounds Request for
5 Production of Documents (Set One) to Defendant 419 Consulting Inc., which shall answer the
6 following requests, separately, fully and under oath, and in the manner provided by the California
7 Code of Civil Procedure and the terms set forth herein. The documents requested herein include
8 those documents in your possession, custody and/or control and shall be produced for inspection
9 and copying by Plaintiff's counsel as those documents are kept in the normal course of business at
10 the location(s) where the documents responsive to these Requests are kept, or at such other time or
11 place or manner as the parties mutually agree in writing.

12 **I. INSTRUCTIONS**

13 In answering this discovery, you are required to produce all DOCUMENTS and DATA
14 responsive to these Requests below in your possession, custody or control or in the possession,
15 custody or control of your officers, employees, agents, representatives or attorneys. A
16 DOCUMENT or DATA is in your control if you have the right to obtain it from another person.

17 In interpreting this discovery, any word, words or language objected to as being "vague" or
18 "ambiguous" shall be defined in accordance with the definitions herein and alternatively, if such
19 word(s) are "vague" or "ambiguous" to you, the words shall be interpreted as defined in a standard
20 edition of Webster's Dictionary. In each instance, state the objection and the corresponding
21 definition which you are applying.

22 If any DOCUMENT or DATA responsive to these Requests was at any time in your
23 possession or custody or subject to your control but now is no longer available for production, state
24 in writing whether the DOCUMENT or DATA:

25 (a) is missing or lost;

26 (b) has been destroyed;

1 (c) has been transferred or delivered to another person or entity and at whose request;
2 (d) has been otherwise disposed of; and
3 (e) in each instance, explain the circumstances surrounding the disposition of the
4 DOCUMENT or DATA and provide the date or approximate date of the DOCUMENT or DATA's
5 disposition.

6 If you claim that any DOCUMENT or DATA responsive to any of these Requests is
7 privileged or protected and you withhold a DOCUMENT or DATA or any portion of a
8 DOCUMENT or DATA on that basis, you must expressly make the claim and support the claim by
9 a description of the nature of the DOCUMENT or DATA, communications, or things not produced
10 that is sufficient to enable Plaintiff's counsel to evaluate and/or contest your claim. You are
11 requested to provide in writing with respect to each DOCUMENT or DATA to which you claim a
12 privilege applies, a full description of the claimed basis for the asserted privilege, including the
13 following information:

- 14 (a) the nature of the privilege you claim (i.e., attorney-client, work product);
- 15 (b) on whose behalf you are asserting the privilege;
- 16 (c) the facts upon which you rely as the basis for claiming the privilege;
- 17 (d) the title (if any) and the general subject matter of the DOCUMENT or DATA;
- 18 (e) the identity of each person who prepared or authored the DOCUMENT or DATA;
- 19 (f) the date the DOCUMENT or DATA was prepared and/or transmitted;
- 20 (g) the identity of each person (if any) who signed the DOCUMENT or DATA;
- 21 (h) the identity of each person to whom the DOCUMENT or DATA was directed,
22 circulated or shown;
- 23 (i) the identity of each person who has reviewed or seen the DOCUMENT or DATA;
- 24 and
- 25 (j) the identity of each person now in possession of the DOCUMENT or DATA.

1 If any portion of a DOCUMENT is responsive to any Request, then the entire DOCUMENT
2 must be produced. If the DOCUMENT contains privileged material, produce the entire
3 DOCUMENT with the privileged material redacted, the fact of redaction so indicated, and the basis
4 of the privilege asserted in your response.

5 If two or more identical duplicate copies of a DOCUMENT exist, the most legible copy
6 should be produced for purposes of these Requests.

7 Any DOCUMENT with any marks on any sheet or side thereof, including without
8 limitation, any initials, stamped indicia, comment or notation of any character, not a part of the
9 original text, or any reproduction thereof, is to be considered a separate DOCUMENT for purposes
10 of responding to any Request.

11 Responsive DOCUMENTS or DATA shall be produced in the manner in which they were
12 kept in the ordinary course of business. Responsive DOCUMENTS shall not be shuffled or
13 otherwise rearranged. DOCUMENTS that in their original condition are stapled, clipped, or
14 otherwise fastened together shall be produced in such form. If a DOCUMENT or group of
15 DOCUMENTS is taken from a file folder, file drawer, file box or notebook for transportation to a
16 central location for Plaintiff's review, please include a copy of the label from such container of the
17 DOCUMENTS.

18 Responsive DOCUMENTS or DATA shall be produced at the location as aforementioned in
19 a manner which is responsive to a particular Request. Upon producing the requested
20 DOCUMENTS or DATA, identify the Request(s) to which any DOCUMENT or DATA or group
21 of DOCUMENTS is responsive.

22 Upon producing the requested DOCUMENTS, you may mark the lower right-hand corner
23 of each page with Bates-stamped, consecutive numbers. Please do not allow the marks to obscure
24 any information on the DOCUMENT.

25 If there are no responsive DOCUMENTS or DATA with respect to a particular request or
26 part thereof please state so in writing.

1 **II. DEFINITIONS**

2 The following definitions apply to each of the requests for documents set forth herein and
3 are deemed to be incorporated in each said request:

4 “ACTION” means *Beck v. Point Loma Patients Consumer Cooperative Corporation et al.*,
5 Case Number 37-2017-00037524-CU-BT-CTL.

6 “COMMUNICATIONS” and words derivative means the act of communicating, including
7 every manner or means of disclosure, transfer, or exchange of information (in the form of facts,
8 ideas, inquiries, or otherwise), whether orally or by document, facsimile, mail, personal delivery,
9 electronically or otherwise.

10 “COMPUTER” means all devices utilizing microchips to facilitate processing, analysis, or
11 storage of electronic information, including but not limited to desktop computers, laptop computers,
12 tablet computers, smartphones, notebook computers, smart watches, and palmtop computers (also
13 known as personal digital assistants or PDA’s).

14 “DOCUMENT(S)” is defined in the manner described by California Evidence Code § 250,
15 and is used in the broadest possible sense to include all tangible items where information is stored
16 or likely to be stored, including information or DATA recorded in any medium, whether written,
17 printed, typed, photostatic, photographed, recorded, stored on a COMPUTER or other electronic
18 form, whether comprised of letters, numbers, graphics, sound or video, whether in original, draft,
19 revision, or non-identical format (i.e., whether different from another document by reason of the
20 time of its creation, whether contemporaneously or subsequently created, or whether different from
21 another document by reason of the notations, marks or other unique characteristics), whether a
22 translation, dictation or reference to an event, whether by handwriting, typewriting, or mimeograph,
23 whether in hard document, recorded or computer R form, including COMPUTER printouts and
24 computer DATA or files, including DATA stored on ZIP or USB drives, external or internal hard
25 drives, compact discs, or other COMPUTER storage devices of any form whatsoever, and including
26 but not limited to all electronic mail (e-mail) and any instant messenger, Slack (type) channel or
27

1 similar, and including any DATA, writings, correspondence, letters, agreements, contracts,
2 memoranda, reports, calendars, date books, checks, invoices, billing statement, notebooks, notes,
3 journals, accountings, ledgers, presentations, manuals, publications, brochures, designs, proposals,
4 and whether privileged or otherwise excluded from discovery.

5 “ELECTRONIC DATA” or “DATA” means the original (or identical duplicate when the
6 original is not available), and any non-identical copies (whether non-identical because of notes
7 made on copies or attached comments, annotations, marks, transmission notations, or highlighting
8 of any kind) of DOCUMENTS of every kind and description whether inscribed by mechanical,
9 facsimile, electronic, magnetic, digital, analogy, or other means. ELECTRONIC DATA and
10 DATA includes, by way of example only, computer programs (whether private, commercial, or
11 work-in-progress), programming notes or instructions, activity listings of electronic mail
12 transmittals and/or receipts, output resulting from the use of any software program, including work
13 processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail,
14 operating systems, sources code of all types, peripheral drivers, portable document format (PDF)
15 files, batch files, ASCII files, and any and all miscellaneous files and/or file fragments, regardless
16 of the media on which they reside and regardless of whether said electronic data consists in an
17 active file, deleted file, or file fragment. ELECTRONIC DATA and DATA also include any and
18 all items stored on computer memories, hard drives, CD-ROMs, CD-R, CD-RW, DVD, Blu-ray, M-
19 Disc, removable media such as Zip disks, flash memory, USB drives, and their equivalent,
20 computer chips, including, but not limited to EDROM, PROM, RAM and ROM, on or in any other
21 vehicle for digital data storage and/or transmittal, including cloud or remote storage such as
22 Dropbox, Google Drive, OneDrive, iCloud, Evernote, and similar. The term ELECTRONIC
23 DATA and DATA also include the file, folder tabs and/or containers and labels appended to, or
24 associated with, any physical storage device associated with each original and/or copy.

25 “MEDICAL MARIJUANA” means cannabis or marijuana, and any derivative or product
26 derived therefrom, including any product containing tetrahydrocannabinol (THC) or cannabidiol
27

1 (CBD), including but not limited to, cannabis flowers, cannabis infused edibles and beverages, hash
2 oil, tinctures, concentrates, cartridges and topical cannabis such as creams, ointments, and patches.

3 “REFER(S)/(ING)” means to have as a subject of a DOCUMENT or ELECTRONIC DATA
4 the nature of the matter requested or to otherwise identify, analyze or concern the matter requested.
5 To be responsive, the subject matter of the DOCUMENT or ELECTRONIC DATA requested need
6 not be the exclusive subject, but rather, concerning the information requested.

7 “RELATE(S)/(ING)” means, without limitation, identifying, describing, discussing,
8 assessing, stating, reflecting, concerning, constituting, containing, embodying, or evidencing in any
9 way, whether directly or indirectly, the particular subject matter identified.

10 “YOU” and “YOUR” mean Defendant 419 Consulting Inc., the responding party to whom
11 this discovery is directed, and includes any present or former company that YOU have acquired,
12 and any local, regional, national, and executive offices, divisions, or subsidiaries, and all present
13 and former directors, officers, partners, executive personnel, managers, agents or employees,
14 including their accountants, attorneys, bankers and advisors acting or purporting to act on the
15 entity’s behalf.

16 **III. RULES OF CONSTRUCTION**

17 The following rules of construction shall apply:

- 18 1. The use of the singular form of any word shall be deemed to include the plural and
19 vice versa;
- 20 2. The use of the present tense includes the past tense and vice versa;
- 21 3. The terms “any,” “all,” “each” and “every” should be understood in either their
22 most or least inclusive sense as necessary to bring within the scope of the discovery request all
23 responses that might otherwise be construed to be outside of their scope, and the term “any” is
24 particularly defined to mean each and every.
- 25 4. The use of one gender shall include all others, including masculine, feminine and
26 neutral genders, as appropriate in the context; and

1 REQUEST NO. 6:

2 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
3 that REFER or RELATE to any salary, wage, compensation, pay, remuneration, emolument,
4 benefit, kick-back, gift, donation or other transfer of value with, including, by or between, YOU
5 and any natural or legal person involved in the cultivation, growth, production, refinement, transfer,
6 carry, transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

7 REQUEST NO. 7:

8 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
9 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for, cash.

10 REQUEST NO. 8:

11 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
12 that REFER or RELATE to the cultivation, growth, production, refinement, transfer, carry,
13 transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

14 REQUEST NO. 9:

15 All COMMUNICATIONS with, including, by or between, any defendant in this ACTION.

16 REQUEST NO. 10:

17 All COMMUNICATIONS with, including, by or between, any natural or legal person
18 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport, distribution,
19 sale, purchase, and/or financing of MEDICAL MARIJUANA.

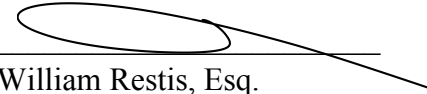
20 REQUEST NO. 11:

21 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
22 that REFER or RELATE to YOUR Articles of Incorporation and any amendments thereto, all
23 bylaws and amendments thereto, and all meeting minutes.

1 DATED: December 1, 2017

Respectfully submitted,

2
3 THE RESTIS LAW FIRM, P.C.

4 

5 William Restis, Esq.
6 550 West C Street, Suite 1760
7 San Diego, CA 92101
8 Tel: +1.619.270.8383
9 Email: william@restislaw.com
10 ATTORNEYS FOR PLAINTIFFS

11 FINKELSTEIN & KRINSK LLP
12 Jeffrey R. Krinsk, Esq. (SBN 109234)
13 jrk@classactionlaw.com
14 550 West C St., Suite 1760
15 San Diego, California 92101
16 Telephone: (619) 238-1333
17 Facsimile: (619) 238-5425

EXHIBIT E

1 THE RESTIS LAW FIRM, P.C.
2 William R. Restis, Esq. (SBN 246823)
3 550 West C Street, Suite 1760
4 San Diego, California 92101
5 Tel: +1.619.270.8383
6 Fax: +1.619.752.1552
7 william@restislaw.com

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
11 **COUNTY OF SAN DIEGO**

12 **KARL BECK**, individually and on behalf of all
13 other similarly situated California residents,

14 Plaintiff,

15 v.

16 **POINT LOMA PATIENTS CONSUMER**
17 **COOPERATIVE CORPORATION**, A
18 California Corporation, **ADAM KNOPF**, an
19 Individual, **JUSTUS H. HENKES IV**, an
20 Individual, **419 CONSULTING INC.**, a
21 California Corporation, **GOLDEN STATE**
22 **GREENS LLC**, a California LLC, **FAR WEST**
23 **MANAGEMENT, LLC**, a California LLC,
24 **FAR WEST OPERATING, LLC**, a California
25 LLC, **FAR WEST STAFFING, LLC**, a
26 California LLC, and **DOES 1-50**,

27 Defendants.

Case No. 37-2017-00037524-CU-BT-CTL

PLAINTIFF'S REQUEST FOR PRODUCTION
OF DOCUMENTS (SET ONE) TO
DEFENDANT GOLDEN STATE GREENS
LLC

[Code Civ. Pro. §§2031.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK
2 RESPONDING PARTY: Defendant GOLDEN STATE GREENS LLC
3 SET NUMBER: ONE (1)

4 Pursuant to Code of Civil Procedure §2031.010, Plaintiff hereby propounds Request for
5 Production of Documents (Set One) to Defendant Golden State Greens LLC, which shall answer
6 the following requests, separately, fully and under oath, and in the manner provided by the
7 California Code of Civil Procedure and the terms set forth herein. The documents requested herein
8 include those documents in your possession, custody and/or control and shall be produced for
9 inspection and copying by Plaintiff's counsel as those documents are kept in the normal course of
10 business at the location(s) where the documents responsive to these Requests are kept, or at such
11 other time or place or manner as the parties mutually agree in writing.

12 **I. INSTRUCTIONS**

13 In answering this discovery, you are required to produce all DOCUMENTS and DATA
14 responsive to these Requests below in your possession, custody or control or in the possession,
15 custody or control of your officers, employees, agents, representatives or attorneys. A
16 DOCUMENT or DATA is in your control if you have the right to obtain it from another person.

17 In interpreting this discovery, any word, words or language objected to as being "vague" or
18 "ambiguous" shall be defined in accordance with the definitions herein and alternatively, if such
19 word(s) are "vague" or "ambiguous" to you, the words shall be interpreted as defined in a standard
20 edition of Webster's Dictionary. In each instance, state the objection and the corresponding
21 definition which you are applying.

22 If any DOCUMENT or DATA responsive to these Requests was at any time in your
23 possession or custody or subject to your control but now is no longer available for production, state
24 in writing whether the DOCUMENT or DATA:

- 25 (a) is missing or lost;
26 (b) has been destroyed;

1 (c) has been transferred or delivered to another person or entity and at whose request;
2 (d) has been otherwise disposed of; and
3 (e) in each instance, explain the circumstances surrounding the disposition of the
4 DOCUMENT or DATA and provide the date or approximate date of the DOCUMENT or DATA's
5 disposition.

6 If you claim that any DOCUMENT or DATA responsive to any of these Requests is
7 privileged or protected and you withhold a DOCUMENT or DATA or any portion of a
8 DOCUMENT or DATA on that basis, you must expressly make the claim and support the claim by
9 a description of the nature of the DOCUMENT or DATA, communications, or things not produced
10 that is sufficient to enable Plaintiff's counsel to evaluate and/or contest your claim. You are
11 requested to provide in writing with respect to each DOCUMENT or DATA to which you claim a
12 privilege applies, a full description of the claimed basis for the asserted privilege, including the
13 following information:

- 14 (a) the nature of the privilege you claim (i.e., attorney-client, work product);
- 15 (b) on whose behalf you are asserting the privilege;
- 16 (c) the facts upon which you rely as the basis for claiming the privilege;
- 17 (d) the title (if any) and the general subject matter of the DOCUMENT or DATA;
- 18 (e) the identity of each person who prepared or authored the DOCUMENT or DATA;
- 19 (f) the date the DOCUMENT or DATA was prepared and/or transmitted;
- 20 (g) the identity of each person (if any) who signed the DOCUMENT or DATA;
- 21 (h) the identity of each person to whom the DOCUMENT or DATA was directed,
22 circulated or shown;
- 23 (i) the identity of each person who has reviewed or seen the DOCUMENT or DATA;
- 24 and
- 25 (j) the identity of each person now in possession of the DOCUMENT or DATA.

1 If any portion of a DOCUMENT is responsive to any Request, then the entire DOCUMENT
2 must be produced. If the DOCUMENT contains privileged material, produce the entire
3 DOCUMENT with the privileged material redacted, the fact of redaction so indicated, and the basis
4 of the privilege asserted in your response.

5 If two or more identical duplicate copies of a DOCUMENT exist, the most legible copy
6 should be produced for purposes of these Requests.

7 Any DOCUMENT with any marks on any sheet or side thereof, including without
8 limitation, any initials, stamped indicia, comment or notation of any character, not a part of the
9 original text, or any reproduction thereof, is to be considered a separate DOCUMENT for purposes
10 of responding to any Request.

11 Responsive DOCUMENTS or DATA shall be produced in the manner in which they were
12 kept in the ordinary course of business. Responsive DOCUMENTS shall not be shuffled or
13 otherwise rearranged. DOCUMENTS that in their original condition are stapled, clipped, or
14 otherwise fastened together shall be produced in such form. If a DOCUMENT or group of
15 DOCUMENTS is taken from a file folder, file drawer, file box or notebook for transportation to a
16 central location for Plaintiff's review, please include a copy of the label from such container of the
17 DOCUMENTS.

18 Responsive DOCUMENTS or DATA shall be produced at the location as aforementioned in
19 a manner which is responsive to a particular Request. Upon producing the requested
20 DOCUMENTS or DATA, identify the Request(s) to which any DOCUMENT or DATA or group
21 of DOCUMENTS is responsive.

22 Upon producing the requested DOCUMENTS, you may mark the lower right-hand corner
23 of each page with Bates-stamped, consecutive numbers. Please do not allow the marks to obscure
24 any information on the DOCUMENT.

25 If there are no responsive DOCUMENTS or DATA with respect to a particular request or
26 part thereof please state so in writing.

1 **II. DEFINITIONS**

2 The following definitions apply to each of the requests for documents set forth herein and
3 are deemed to be incorporated in each said request:

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5 Case Number 37-2017-00037524-CU-BT-CTL.

6 “COMMUNICATIONS” and words derivative means the act of communicating, including
7 every manner or means of disclosure, transfer, or exchange of information (in the form of facts,
8 ideas, inquiries, or otherwise), whether orally or by document, facsimile, mail, personal delivery,
9 electronically or otherwise.

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11 storage of electronic information, including but not limited to desktop computers, laptop computers,
12 tablet computers, smartphones, notebook computers, smart watches, and palmtop computers (also
13 known as personal digital assistants or PDA’s).

14 “DOCUMENT(S)” is defined in the manner described by California Evidence Code § 250,
15 and is used in the broadest possible sense to include all tangible items where information is stored
16 or likely to be stored, including information or DATA recorded in any medium, whether written,
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19 revision, or non-identical format (i.e., whether different from another document by reason of the
20 time of its creation, whether contemporaneously or subsequently created, or whether different from
21 another document by reason of the notations, marks or other unique characteristics), whether a
22 translation, dictation or reference to an event, whether by handwriting, typewriting, or mimeograph,
23 whether in hard document, recorded or computer R form, including COMPUTER printouts and
24 computer DATA or files, including DATA stored on ZIP or USB drives, external or internal hard
25 drives, compact discs, or other COMPUTER storage devices of any form whatsoever, and including
26 but not limited to all electronic mail (e-mail) and any instant messenger, Slack (type) channel or
27

1 similar, and including any DATA, writings, correspondence, letters, agreements, contracts,
2 memoranda, reports, calendars, date books, checks, invoices, billing statement, notebooks, notes,
3 journals, accountings, ledgers, presentations, manuals, publications, brochures, designs, proposals,
4 and whether privileged or otherwise excluded from discovery.

5 “ELECTRONIC DATA” or “DATA” means the original (or identical duplicate when the
6 original is not available), and any non-identical copies (whether non-identical because of notes
7 made on copies or attached comments, annotations, marks, transmission notations, or highlighting
8 of any kind) of DOCUMENTS of every kind and description whether inscribed by mechanical,
9 facsimile, electronic, magnetic, digital, analogy, or other means. ELECTRONIC DATA and
10 DATA includes, by way of example only, computer programs (whether private, commercial, or
11 work-in-progress), programming notes or instructions, activity listings of electronic mail
12 transmittals and/or receipts, output resulting from the use of any software program, including work
13 processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail,
14 operating systems, sources code of all types, peripheral drivers, portable document format (PDF)
15 files, batch files, ASCII files, and any and all miscellaneous files and/or file fragments, regardless
16 of the media on which they reside and regardless of whether said electronic data consists in an
17 active file, deleted file, or file fragment. ELECTRONIC DATA and DATA also include any and
18 all items stored on computer memories, hard drives, CD-ROMs, CD-R, CD-RW, DVD, Blu-ray, M-
19 Disc, removable media such as Zip disks, flash memory, USB drives, and their equivalent,
20 computer chips, including, but not limited to EDROM, PROM, RAM and ROM, on or in any other
21 vehicle for digital data storage and/or transmittal, including cloud or remote storage such as
22 Dropbox, Google Drive, OneDrive, iCloud, Evernote, and similar. The term ELECTRONIC
23 DATA and DATA also include the file, folder tabs and/or containers and labels appended to, or
24 associated with, any physical storage device associated with each original and/or copy.

25 “MEDICAL MARIJUANA” means cannabis or marijuana, and any derivative or product
26 derived therefrom, including any product containing tetrahydrocannabinol (THC) or cannabidiol
27

1 (CBD), including but not limited to, cannabis flowers, cannabis infused edibles and beverages, hash
2 oil, tinctures, concentrates, cartridges and topical cannabis such as creams, ointments, and patches.

3 “REFER(S)/(ING)” means to have as a subject of a DOCUMENT or ELECTRONIC DATA
4 the nature of the matter requested or to otherwise identify, analyze or concern the matter requested.
5 To be responsive, the subject matter of the DOCUMENT or ELECTRONIC DATA requested need
6 not be the exclusive subject, but rather, concerning the information requested.

7 “RELATE(S)/(ING)” means, without limitation, identifying, describing, discussing,
8 assessing, stating, reflecting, concerning, constituting, containing, embodying, or evidencing in any
9 way, whether directly or indirectly, the particular subject matter identified.

10 “YOU” and “YOUR” mean Defendant Golden State Greens LLC, the responding party to
11 whom this discovery is directed, and includes any present or former company that YOU have
12 acquired, and any local, regional, national, and executive offices, divisions, or subsidiaries, and all
13 present and former directors, officers, partners, executive personnel, managers, agents or
14 employees, including their accountants, attorneys, bankers and advisors acting or purporting to act
15 on the entity’s behalf.

16 **III. RULES OF CONSTRUCTION**

17 The following rules of construction shall apply:

- 18 1. The use of the singular form of any word shall be deemed to include the plural and
19 vice versa;
- 20 2. The use of the present tense includes the past tense and vice versa;
- 21 3. The terms “any,” “all,” “each” and “every” should be understood in either their
22 most or least inclusive sense as necessary to bring within the scope of the discovery request all
23 responses that might otherwise be construed to be outside of their scope, and the term “any” is
24 particularly defined to mean each and every.
- 25 4. The use of one gender shall include all others, including masculine, feminine and
26 neutral genders, as appropriate in the context; and

1 REQUEST NO. 6:

2 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
3 that REFER or RELATE to any salary, wage, compensation, pay, remuneration, emolument,
4 benefit, kick-back, gift, donation or other transfer of value with, including, by or between, YOU
5 and any natural or legal person involved in the cultivation, growth, production, refinement, transfer,
6 carry, transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

7 REQUEST NO. 7:

8 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
9 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for, cash.

10 REQUEST NO. 8:

11 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
12 that REFER or RELATE to the cultivation, growth, production, refinement, transfer, carry,
13 transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

14 REQUEST NO. 9:

15 All COMMUNICATIONS with, including, by or between, any defendant in this ACTION.

16 REQUEST NO. 10:

17 All COMMUNICATIONS with, including, by or between, any natural or legal person
18 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport, distribution,
19 sale, purchase, and/or financing of MEDICAL MARIJUANA.

20 REQUEST NO. 11:

21 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
22 that REFER or RELATE to YOUR Articles of Incorporation and any amendments thereto, all
23 bylaws and amendments thereto, and all meeting minutes.

1 DATED: December 1, 2017

Respectfully submitted,

2 THE RESTIS LAW FIRM, P.C.

3
4 
5 William Restis, Esq.
6 550 West C Street, Suite 1760
7 San Diego, CA 92101
8 Tel: +1.619.270.8383
9 Email: william@restislaw.com
10 ATTORNEYS FOR PLAINTIFFS

11 FINKELSTEIN & KRINSK LLP
12 Jeffrey R. Krinsk, Esq. (SBN 109234)
13 jrk@classactionlaw.com
14 550 West C St., Suite 1760
15 San Diego, California 92101
16 Telephone: (619) 238-1333
17 Facsimile: (619) 238-5425

EXHIBIT F

1 THE RESTIS LAW FIRM, P.C.
2 William R. Restis, Esq. (SBN 246823)
3 550 West C Street, Suite 1760
4 San Diego, California 92101
5 Tel: +1.619.270.8383
6 Fax: +1.619.752.1552
7 william@restislaw.com

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
11 **COUNTY OF SAN DIEGO**

12 **KARL BECK**, individually and on behalf of all
13 other similarly situated California residents,

14 Plaintiff,

15 v.

16 **POINT LOMA PATIENTS CONSUMER**
17 **COOPERATIVE CORPORATION**, A
18 California Corporation, **ADAM KNOPF**, an
19 Individual, **JUSTUS H. HENKES IV**, an
20 Individual, **419 CONSULTING INC.**, a
21 California Corporation, **GOLDEN STATE**
22 **GREENS LLC**, a California LLC, **FAR WEST**
23 **MANAGEMENT, LLC**, a California LLC,
24 **FAR WEST OPERATING, LLC**, a California
25 LLC, **FAR WEST STAFFING, LLC**, a
26 California LLC, and **DOES 1-50**,

27 Defendants.

Case No. 37-2017-00037524-CU-BT-CTL

PLAINTIFF'S REQUEST FOR PRODUCTION
OF DOCUMENTS (SET ONE) TO
DEFENDANT FAR WEST MANAGEMENT,
LLC

[Code Civ. Pro. §§2031.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK
2 RESPONDING PARTY: Defendant FAR WEST MANAGEMENT, LLC
3 SET NUMBER: ONE (1)

4 Pursuant to Code of Civil Procedure §2031.010, Plaintiff hereby propounds Request for
5 Production of Documents (Set One) to Defendant Far West Management, LLC, which shall answer
6 the following requests, separately, fully and under oath, and in the manner provided by the
7 California Code of Civil Procedure and the terms set forth herein. The documents requested herein
8 include those documents in your possession, custody and/or control and shall be produced for
9 inspection and copying by Plaintiff's counsel as those documents are kept in the normal course of
10 business at the location(s) where the documents responsive to these Requests are kept, or at such
11 other time or place or manner as the parties mutually agree in writing.

12 **I. INSTRUCTIONS**

13 In answering this discovery, you are required to produce all DOCUMENTS and DATA
14 responsive to these Requests below in your possession, custody or control or in the possession,
15 custody or control of your officers, employees, agents, representatives or attorneys. A
16 DOCUMENT or DATA is in your control if you have the right to obtain it from another person.

17 In interpreting this discovery, any word, words or language objected to as being "vague" or
18 "ambiguous" shall be defined in accordance with the definitions herein and alternatively, if such
19 word(s) are "vague" or "ambiguous" to you, the words shall be interpreted as defined in a standard
20 edition of Webster's Dictionary. In each instance, state the objection and the corresponding
21 definition which you are applying.

22 If any DOCUMENT or DATA responsive to these Requests was at any time in your
23 possession or custody or subject to your control but now is no longer available for production, state
24 in writing whether the DOCUMENT or DATA:

- 25 (a) is missing or lost;
26 (b) has been destroyed;

1 (c) has been transferred or delivered to another person or entity and at whose request;
2 (d) has been otherwise disposed of; and
3 (e) in each instance, explain the circumstances surrounding the disposition of the
4 DOCUMENT or DATA and provide the date or approximate date of the DOCUMENT or DATA's
5 disposition.

6 If you claim that any DOCUMENT or DATA responsive to any of these Requests is
7 privileged or protected and you withhold a DOCUMENT or DATA or any portion of a
8 DOCUMENT or DATA on that basis, you must expressly make the claim and support the claim by
9 a description of the nature of the DOCUMENT or DATA, communications, or things not produced
10 that is sufficient to enable Plaintiff's counsel to evaluate and/or contest your claim. You are
11 requested to provide in writing with respect to each DOCUMENT or DATA to which you claim a
12 privilege applies, a full description of the claimed basis for the asserted privilege, including the
13 following information:

- 14 (a) the nature of the privilege you claim (i.e., attorney-client, work product);
- 15 (b) on whose behalf you are asserting the privilege;
- 16 (c) the facts upon which you rely as the basis for claiming the privilege;
- 17 (d) the title (if any) and the general subject matter of the DOCUMENT or DATA;
- 18 (e) the identity of each person who prepared or authored the DOCUMENT or DATA;
- 19 (f) the date the DOCUMENT or DATA was prepared and/or transmitted;
- 20 (g) the identity of each person (if any) who signed the DOCUMENT or DATA;
- 21 (h) the identity of each person to whom the DOCUMENT or DATA was directed,
22 circulated or shown;
- 23 (i) the identity of each person who has reviewed or seen the DOCUMENT or DATA;
- 24 and
- 25 (j) the identity of each person now in possession of the DOCUMENT or DATA.

1 If any portion of a DOCUMENT is responsive to any Request, then the entire DOCUMENT
2 must be produced. If the DOCUMENT contains privileged material, produce the entire
3 DOCUMENT with the privileged material redacted, the fact of redaction so indicated, and the basis
4 of the privilege asserted in your response.

5 If two or more identical duplicate copies of a DOCUMENT exist, the most legible copy
6 should be produced for purposes of these Requests.

7 Any DOCUMENT with any marks on any sheet or side thereof, including without
8 limitation, any initials, stamped indicia, comment or notation of any character, not a part of the
9 original text, or any reproduction thereof, is to be considered a separate DOCUMENT for purposes
10 of responding to any Request.

11 Responsive DOCUMENTS or DATA shall be produced in the manner in which they were
12 kept in the ordinary course of business. Responsive DOCUMENTS shall not be shuffled or
13 otherwise rearranged. DOCUMENTS that in their original condition are stapled, clipped, or
14 otherwise fastened together shall be produced in such form. If a DOCUMENT or group of
15 DOCUMENTS is taken from a file folder, file drawer, file box or notebook for transportation to a
16 central location for Plaintiff's review, please include a copy of the label from such container of the
17 DOCUMENTS.

18 Responsive DOCUMENTS or DATA shall be produced at the location as aforementioned in
19 a manner which is responsive to a particular Request. Upon producing the requested
20 DOCUMENTS or DATA, identify the Request(s) to which any DOCUMENT or DATA or group
21 of DOCUMENTS is responsive.

22 Upon producing the requested DOCUMENTS, you may mark the lower right-hand corner
23 of each page with Bates-stamped, consecutive numbers. Please do not allow the marks to obscure
24 any information on the DOCUMENT.

25 If there are no responsive DOCUMENTS or DATA with respect to a particular request or
26 part thereof please state so in writing.

1 **II. DEFINITIONS**

2 The following definitions apply to each of the requests for documents set forth herein and
3 are deemed to be incorporated in each said request:

4 “ACTION” means *Beck v. Point Loma Patients Consumer Cooperative Corporation et al.*,
5 Case Number 37-2017-00037524-CU-BT-CTL.

6 “COMMUNICATIONS” and words derivative means the act of communicating, including
7 every manner or means of disclosure, transfer, or exchange of information (in the form of facts,
8 ideas, inquiries, or otherwise), whether orally or by document, facsimile, mail, personal delivery,
9 electronically or otherwise.

10 “COMPUTER” means all devices utilizing microchips to facilitate processing, analysis, or
11 storage of electronic information, including but not limited to desktop computers, laptop computers,
12 tablet computers, smartphones, notebook computers, smart watches, and palmtop computers (also
13 known as personal digital assistants or PDA’s).

14 “DOCUMENT(S)” is defined in the manner described by California Evidence Code § 250,
15 and is used in the broadest possible sense to include all tangible items where information is stored
16 or likely to be stored, including information or DATA recorded in any medium, whether written,
17 printed, typed, photostatic, photographed, recorded, stored on a COMPUTER or other electronic
18 form, whether comprised of letters, numbers, graphics, sound or video, whether in original, draft,
19 revision, or non-identical format (i.e., whether different from another document by reason of the
20 time of its creation, whether contemporaneously or subsequently created, or whether different from
21 another document by reason of the notations, marks or other unique characteristics), whether a
22 translation, dictation or reference to an event, whether by handwriting, typewriting, or mimeograph,
23 whether in hard document, recorded or computer R form, including COMPUTER printouts and
24 computer DATA or files, including DATA stored on ZIP or USB drives, external or internal hard
25 drives, compact discs, or other COMPUTER storage devices of any form whatsoever, and including
26 but not limited to all electronic mail (e-mail) and any instant messenger, Slack (type) channel or
27

1 similar, and including any DATA, writings, correspondence, letters, agreements, contracts,
2 memoranda, reports, calendars, date books, checks, invoices, billing statement, notebooks, notes,
3 journals, accountings, ledgers, presentations, manuals, publications, brochures, designs, proposals,
4 and whether privileged or otherwise excluded from discovery.

5 “ELECTRONIC DATA” or “DATA” means the original (or identical duplicate when the
6 original is not available), and any non-identical copies (whether non-identical because of notes
7 made on copies or attached comments, annotations, marks, transmission notations, or highlighting
8 of any kind) of DOCUMENTS of every kind and description whether inscribed by mechanical,
9 facsimile, electronic, magnetic, digital, analogy, or other means. ELECTRONIC DATA and
10 DATA includes, by way of example only, computer programs (whether private, commercial, or
11 work-in-progress), programming notes or instructions, activity listings of electronic mail
12 transmittals and/or receipts, output resulting from the use of any software program, including work
13 processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail,
14 operating systems, sources code of all types, peripheral drivers, portable document format (PDF)
15 files, batch files, ASCII files, and any and all miscellaneous files and/or file fragments, regardless
16 of the media on which they reside and regardless of whether said electronic data consists in an
17 active file, deleted file, or file fragment. ELECTRONIC DATA and DATA also include any and
18 all items stored on computer memories, hard drives, CD-ROMs, CD-R, CD-RW, DVD, Blu-ray, M-
19 Disc, removable media such as Zip disks, flash memory, USB drives, and their equivalent,
20 computer chips, including, but not limited to EDROM, PROM, RAM and ROM, on or in any other
21 vehicle for digital data storage and/or transmittal, including cloud or remote storage such as
22 Dropbox, Google Drive, OneDrive, iCloud, Evernote, and similar. The term ELECTRONIC
23 DATA and DATA also include the file, folder tabs and/or containers and labels appended to, or
24 associated with, any physical storage device associated with each original and/or copy.

25 “MEDICAL MARIJUANA” means cannabis or marijuana, and any derivative or product
26 derived therefrom, including any product containing tetrahydrocannabinol (THC) or cannabidiol
27

1 (CBD), including but not limited to, cannabis flowers, cannabis infused edibles and beverages, hash
2 oil, tinctures, concentrates, cartridges and topical cannabis such as creams, ointments, and patches.

3 “REFER(S)/(ING)” means to have as a subject of a DOCUMENT or ELECTRONIC DATA
4 the nature of the matter requested or to otherwise identify, analyze or concern the matter requested.
5 To be responsive, the subject matter of the DOCUMENT or ELECTRONIC DATA requested need
6 not be the exclusive subject, but rather, concerning the information requested.

7 “RELATE(S)/(ING)” means, without limitation, identifying, describing, discussing,
8 assessing, stating, reflecting, concerning, constituting, containing, embodying, or evidencing in any
9 way, whether directly or indirectly, the particular subject matter identified.

10 “YOU” and “YOUR” mean Defendant Far West Management, LLC, the responding party to
11 whom this discovery is directed, and includes any present or former company that YOU have
12 acquired, and any local, regional, national, and executive offices, divisions, or subsidiaries, and all
13 present and former directors, officers, partners, executive personnel, managers, agents or
14 employees, including their accountants, attorneys, bankers and advisors acting or purporting to act
15 on the entity’s behalf.

16 **III. RULES OF CONSTRUCTION**

17 The following rules of construction shall apply:

- 18 1. The use of the singular form of any word shall be deemed to include the plural and
19 vice versa;
- 20 2. The use of the present tense includes the past tense and vice versa;
- 21 3. The terms “any,” “all,” “each” and “every” should be understood in either their
22 most or least inclusive sense as necessary to bring within the scope of the discovery request all
23 responses that might otherwise be construed to be outside of their scope, and the term “any” is
24 particularly defined to mean each and every.
- 25 4. The use of one gender shall include all others, including masculine, feminine and
26 neutral genders, as appropriate in the context; and

1 REQUEST NO. 6:

2 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
3 that REFER or RELATE to any salary, wage, compensation, pay, remuneration, emolument,
4 benefit, kick-back, gift, donation or other transfer of value with, including, by or between, YOU
5 and any natural or legal person involved in the cultivation, growth, production, refinement, transfer,
6 carry, transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

7 REQUEST NO. 7:

8 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
9 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for, cash.

10 REQUEST NO. 8:

11 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
12 that REFER or RELATE to the cultivation, growth, production, refinement, transfer, carry,
13 transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

14 REQUEST NO. 9:

15 All COMMUNICATIONS with, including, by or between, any defendant in this ACTION.

16 REQUEST NO. 10:

17 All COMMUNICATIONS with, including, by or between, any natural or legal person
18 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport, distribution,
19 sale, purchase, and/or financing of MEDICAL MARIJUANA.

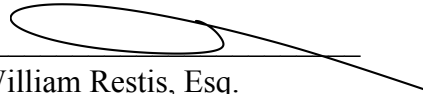
20 REQUEST NO. 11:

21 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
22 that REFER or RELATE to YOUR Articles of Incorporation and any amendments thereto, all
23 bylaws and amendments thereto, and all meeting minutes.

1 DATED: December 1, 2017

Respectfully submitted,

2
3 THE RESTIS LAW FIRM, P.C.

4 

5 William Restis, Esq.
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7 San Diego, CA 92101
8 Tel: +1.619.270.8383
9 Email: william@restislaw.com
10 ATTORNEYS FOR PLAINTIFFS

11 FINKELSTEIN & KRINSK LLP
12 Jeffrey R. Krinsk, Esq. (SBN 109234)
13 jrk@classactionlaw.com
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15 San Diego, California 92101
16 Telephone: (619) 238-1333
17 Facsimile: (619) 238-5425

EXHIBIT G

1 THE RESTIS LAW FIRM, P.C.
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4 San Diego, California 92101
5 Tel: +1.619.270.8383
6 Fax: +1.619.752.1552
7 william@restislaw.com

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
11 **COUNTY OF SAN DIEGO**

12 **KARL BECK**, individually and on behalf of all
13 other similarly situated California residents,

14 Plaintiff,

15 v.

16 **POINT LOMA PATIENTS CONSUMER**
17 **COOPERATIVE CORPORATION**, A
18 California Corporation, **ADAM KNOPF**, an
19 Individual, **JUSTUS H. HENKES IV**, an
20 Individual, **419 CONSULTING INC.**, a
21 California Corporation, **GOLDEN STATE**
22 **GREENS LLC**, a California LLC, **FAR WEST**
23 **MANAGEMENT, LLC**, a California LLC,
24 **FAR WEST OPERATING, LLC**, a California
25 LLC, **FAR WEST STAFFING, LLC**, a
26 California LLC, and **DOES 1-50**,

27 Defendants.

Case No. 37-2017-00037524-CU-BT-CTL

PLAINTIFF'S REQUEST FOR PRODUCTION
OF DOCUMENTS (SET ONE) TO
DEFENDANT FAR WEST OPERATING, LLC

[Code Civ. Pro. §§2031.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK

2 RESPONDING PARTY: Defendant FAR WEST OPERATING, LLC

3 SET NUMBER: ONE (1)

4 Pursuant to Code of Civil Procedure §2031.010, Plaintiff hereby propounds Request for
5 Production of Documents (Set One) to Defendant Far West Operating, LLC, which shall answer the
6 following requests, separately, fully and under oath, and in the manner provided by the California
7 Code of Civil Procedure and the terms set forth herein. The documents requested herein include
8 those documents in your possession, custody and/or control and shall be produced for inspection
9 and copying by Plaintiff's counsel as those documents are kept in the normal course of business at
10 the location(s) where the documents responsive to these Requests are kept, or at such other time or
11 place or manner as the parties mutually agree in writing.

12 **I. INSTRUCTIONS**

13 In answering this discovery, you are required to produce all DOCUMENTS and DATA
14 responsive to these Requests below in your possession, custody or control or in the possession,
15 custody or control of your officers, employees, agents, representatives or attorneys. A
16 DOCUMENT or DATA is in your control if you have the right to obtain it from another person.

17 In interpreting this discovery, any word, words or language objected to as being "vague" or
18 "ambiguous" shall be defined in accordance with the definitions herein and alternatively, if such
19 word(s) are "vague" or "ambiguous" to you, the words shall be interpreted as defined in a standard
20 edition of Webster's Dictionary. In each instance, state the objection and the corresponding
21 definition which you are applying.

22 If any DOCUMENT or DATA responsive to these Requests was at any time in your
23 possession or custody or subject to your control but now is no longer available for production, state
24 in writing whether the DOCUMENT or DATA:

25 (a) is missing or lost;

26 (b) has been destroyed;

1 (c) has been transferred or delivered to another person or entity and at whose request;
2 (d) has been otherwise disposed of; and
3 (e) in each instance, explain the circumstances surrounding the disposition of the
4 DOCUMENT or DATA and provide the date or approximate date of the DOCUMENT or DATA's
5 disposition.

6 If you claim that any DOCUMENT or DATA responsive to any of these Requests is
7 privileged or protected and you withhold a DOCUMENT or DATA or any portion of a
8 DOCUMENT or DATA on that basis, you must expressly make the claim and support the claim by
9 a description of the nature of the DOCUMENT or DATA, communications, or things not produced
10 that is sufficient to enable Plaintiff's counsel to evaluate and/or contest your claim. You are
11 requested to provide in writing with respect to each DOCUMENT or DATA to which you claim a
12 privilege applies, a full description of the claimed basis for the asserted privilege, including the
13 following information:

- 14 (a) the nature of the privilege you claim (i.e., attorney-client, work product);
- 15 (b) on whose behalf you are asserting the privilege;
- 16 (c) the facts upon which you rely as the basis for claiming the privilege;
- 17 (d) the title (if any) and the general subject matter of the DOCUMENT or DATA;
- 18 (e) the identity of each person who prepared or authored the DOCUMENT or DATA;
- 19 (f) the date the DOCUMENT or DATA was prepared and/or transmitted;
- 20 (g) the identity of each person (if any) who signed the DOCUMENT or DATA;
- 21 (h) the identity of each person to whom the DOCUMENT or DATA was directed,
22 circulated or shown;
- 23 (i) the identity of each person who has reviewed or seen the DOCUMENT or DATA;
- 24 and
- 25 (j) the identity of each person now in possession of the DOCUMENT or DATA.

1 If any portion of a DOCUMENT is responsive to any Request, then the entire DOCUMENT
2 must be produced. If the DOCUMENT contains privileged material, produce the entire
3 DOCUMENT with the privileged material redacted, the fact of redaction so indicated, and the basis
4 of the privilege asserted in your response.

5 If two or more identical duplicate copies of a DOCUMENT exist, the most legible copy
6 should be produced for purposes of these Requests.

7 Any DOCUMENT with any marks on any sheet or side thereof, including without
8 limitation, any initials, stamped indicia, comment or notation of any character, not a part of the
9 original text, or any reproduction thereof, is to be considered a separate DOCUMENT for purposes
10 of responding to any Request.

11 Responsive DOCUMENTS or DATA shall be produced in the manner in which they were
12 kept in the ordinary course of business. Responsive DOCUMENTS shall not be shuffled or
13 otherwise rearranged. DOCUMENTS that in their original condition are stapled, clipped, or
14 otherwise fastened together shall be produced in such form. If a DOCUMENT or group of
15 DOCUMENTS is taken from a file folder, file drawer, file box or notebook for transportation to a
16 central location for Plaintiff's review, please include a copy of the label from such container of the
17 DOCUMENTS.

18 Responsive DOCUMENTS or DATA shall be produced at the location as aforementioned in
19 a manner which is responsive to a particular Request. Upon producing the requested
20 DOCUMENTS or DATA, identify the Request(s) to which any DOCUMENT or DATA or group
21 of DOCUMENTS is responsive.

22 Upon producing the requested DOCUMENTS, you may mark the lower right-hand corner
23 of each page with Bates-stamped, consecutive numbers. Please do not allow the marks to obscure
24 any information on the DOCUMENT.

25 If there are no responsive DOCUMENTS or DATA with respect to a particular request or
26 part thereof please state so in writing.

1 **II. DEFINITIONS**

2 The following definitions apply to each of the requests for documents set forth herein and
3 are deemed to be incorporated in each said request:

4 “ACTION” means *Beck v. Point Loma Patients Consumer Cooperative Corporation et al.*,
5 Case Number 37-2017-00037524-CU-BT-CTL.

6 “COMMUNICATIONS” and words derivative means the act of communicating, including
7 every manner or means of disclosure, transfer, or exchange of information (in the form of facts,
8 ideas, inquiries, or otherwise), whether orally or by document, facsimile, mail, personal delivery,
9 electronically or otherwise.

10 “COMPUTER” means all devices utilizing microchips to facilitate processing, analysis, or
11 storage of electronic information, including but not limited to desktop computers, laptop computers,
12 tablet computers, smartphones, notebook computers, smart watches, and palmtop computers (also
13 known as personal digital assistants or PDA’s).

14 “DOCUMENT(S)” is defined in the manner described by California Evidence Code § 250,
15 and is used in the broadest possible sense to include all tangible items where information is stored
16 or likely to be stored, including information or DATA recorded in any medium, whether written,
17 printed, typed, photostatic, photographed, recorded, stored on a COMPUTER or other electronic
18 form, whether comprised of letters, numbers, graphics, sound or video, whether in original, draft,
19 revision, or non-identical format (i.e., whether different from another document by reason of the
20 time of its creation, whether contemporaneously or subsequently created, or whether different from
21 another document by reason of the notations, marks or other unique characteristics), whether a
22 translation, dictation or reference to an event, whether by handwriting, typewriting, or mimeograph,
23 whether in hard document, recorded or computer R form, including COMPUTER printouts and
24 computer DATA or files, including DATA stored on ZIP or USB drives, external or internal hard
25 drives, compact discs, or other COMPUTER storage devices of any form whatsoever, and including
26 but not limited to all electronic mail (e-mail) and any instant messenger, Slack (type) channel or
27

1 similar, and including any DATA, writings, correspondence, letters, agreements, contracts,
2 memoranda, reports, calendars, date books, checks, invoices, billing statement, notebooks, notes,
3 journals, accountings, ledgers, presentations, manuals, publications, brochures, designs, proposals,
4 and whether privileged or otherwise excluded from discovery.

5 “ELECTRONIC DATA” or “DATA” means the original (or identical duplicate when the
6 original is not available), and any non-identical copies (whether non-identical because of notes
7 made on copies or attached comments, annotations, marks, transmission notations, or highlighting
8 of any kind) of DOCUMENTS of every kind and description whether inscribed by mechanical,
9 facsimile, electronic, magnetic, digital, analogy, or other means. ELECTRONIC DATA and
10 DATA includes, by way of example only, computer programs (whether private, commercial, or
11 work-in-progress), programming notes or instructions, activity listings of electronic mail
12 transmittals and/or receipts, output resulting from the use of any software program, including work
13 processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail,
14 operating systems, sources code of all types, peripheral drivers, portable document format (PDF)
15 files, batch files, ASCII files, and any and all miscellaneous files and/or file fragments, regardless
16 of the media on which they reside and regardless of whether said electronic data consists in an
17 active file, deleted file, or file fragment. ELECTRONIC DATA and DATA also include any and
18 all items stored on computer memories, hard drives, CD-ROMs, CD-R, CD-RW, DVD, Blu-ray, M-
19 Disc, removable media such as Zip disks, flash memory, USB drives, and their equivalent,
20 computer chips, including, but not limited to EDROM, PROM, RAM and ROM, on or in any other
21 vehicle for digital data storage and/or transmittal, including cloud or remote storage such as
22 Dropbox, Google Drive, OneDrive, iCloud, Evernote, and similar. The term ELECTRONIC
23 DATA and DATA also include the file, folder tabs and/or containers and labels appended to, or
24 associated with, any physical storage device associated with each original and/or copy.

25 “MEDICAL MARIJUANA” means cannabis or marijuana, and any derivative or product
26 derived therefrom, including any product containing tetrahydrocannabinol (THC) or cannabidiol
27

1 (CBD), including but not limited to, cannabis flowers, cannabis infused edibles and beverages, hash
2 oil, tinctures, concentrates, cartridges and topical cannabis such as creams, ointments, and patches.

3 “REFER(S)/(ING)” means to have as a subject of a DOCUMENT or ELECTRONIC DATA
4 the nature of the matter requested or to otherwise identify, analyze or concern the matter requested.
5 To be responsive, the subject matter of the DOCUMENT or ELECTRONIC DATA requested need
6 not be the exclusive subject, but rather, concerning the information requested.

7 “RELATE(S)/(ING)” means, without limitation, identifying, describing, discussing,
8 assessing, stating, reflecting, concerning, constituting, containing, embodying, or evidencing in any
9 way, whether directly or indirectly, the particular subject matter identified.

10 “YOU” and “YOUR” mean Defendant Far West Operating, LLC, the responding party to
11 whom this discovery is directed, and includes any present or former company that YOU have
12 acquired, and any local, regional, national, and executive offices, divisions, or subsidiaries, and all
13 present and former directors, officers, partners, executive personnel, managers, agents or
14 employees, including their accountants, attorneys, bankers and advisors acting or purporting to act
15 on the entity’s behalf.

16 **III. RULES OF CONSTRUCTION**

17 The following rules of construction shall apply:

- 18 1. The use of the singular form of any word shall be deemed to include the plural and
19 vice versa;
- 20 2. The use of the present tense includes the past tense and vice versa;
- 21 3. The terms “any,” “all,” “each” and “every” should be understood in either their
22 most or least inclusive sense as necessary to bring within the scope of the discovery request all
23 responses that might otherwise be construed to be outside of their scope, and the term “any” is
24 particularly defined to mean each and every.
- 25 4. The use of one gender shall include all others, including masculine, feminine and
26 neutral genders, as appropriate in the context; and

1 REQUEST NO. 6:

2 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
3 that REFER or RELATE to any salary, wage, compensation, pay, remuneration, emolument,
4 benefit, kick-back, gift, donation or other transfer of value with, including, by or between, YOU
5 and any natural or legal person involved in the cultivation, growth, production, refinement, transfer,
6 carry, transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

7 REQUEST NO. 7:

8 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
9 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for, cash.

10 REQUEST NO. 8:

11 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
12 that REFER or RELATE to the cultivation, growth, production, refinement, transfer, carry,
13 transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

14 REQUEST NO. 9:

15 All COMMUNICATIONS with, including, by or between, any defendant in this ACTION.

16 REQUEST NO. 10:

17 All COMMUNICATIONS with, including, by or between, any natural or legal person
18 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport, distribution,
19 sale, purchase, and/or financing of MEDICAL MARIJUANA.

20 REQUEST NO. 11:

21 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
22 that REFER or RELATE to YOUR Articles of Incorporation and any amendments thereto, all
23 bylaws and amendments thereto, and all meeting minutes.

1 DATED: December 1, 2017

Respectfully submitted,

2
3 THE RESTIS LAW FIRM, P.C.

4 
5 William Restis, Esq.
6 550 West C Street, Suite 1760
7 San Diego, CA 92101
8 Tel: +1.619.270.8383
9 Email: william@restislaw.com
10 ATTORNEYS FOR PLAINTIFFS

11 FINKELSTEIN & KRINSK LLP
12 Jeffrey R. Krinsk, Esq. (SBN 109234)
13 jrk@classactionlaw.com
14 550 West C St., Suite 1760
15 San Diego, California 92101
16 Telephone: (619) 238-1333
17 Facsimile: (619) 238-5425

EXHIBIT H

1 THE RESTIS LAW FIRM, P.C.
2 William R. Restis, Esq. (SBN 246823)
3 550 West C Street, Suite 1760
4 San Diego, California 92101
5 Tel: +1.619.270.8383
6 Fax: +1.619.752.1552
7 william@restislaw.com

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
11 **COUNTY OF SAN DIEGO**

12 **KARL BECK**, individually and on behalf of all
13 other similarly situated California residents,

14 Plaintiff,

15 v.

16 **POINT LOMA PATIENTS CONSUMER**
17 **COOPERATIVE CORPORATION**, A
18 California Corporation, **ADAM KNOPF**, an
19 Individual, **JUSTUS H. HENKES IV**, an
20 Individual, **419 CONSULTING INC.**, a
21 California Corporation, **GOLDEN STATE**
22 **GREENS LLC**, a California LLC, **FAR WEST**
23 **MANAGEMENT, LLC**, a California LLC,
24 **FAR WEST OPERATING, LLC**, a California
25 LLC, **FAR WEST STAFFING, LLC**, a
26 California LLC, and **DOES 1-50**,

27 Defendants.

Case No. 37-2017-00037524-CU-BT-CTL

PLAINTIFF'S REQUEST FOR PRODUCTION
OF DOCUMENTS (SET ONE) TO
DEFENDANT FAR WEST STAFFING, LLC

[Code Civ. Pro. §§2031.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK

2 RESPONDING PARTY: Defendant FAR WEST STAFFING, LLC

3 SET NUMBER: ONE (1)

4 Pursuant to Code of Civil Procedure §2031.010, Plaintiff hereby propounds Request for
5 Production of Documents (Set One) to Defendant Far West Staffing, LLC, which shall answer the
6 following requests, separately, fully and under oath, and in the manner provided by the California
7 Code of Civil Procedure and the terms set forth herein. The documents requested herein include
8 those documents in your possession, custody and/or control and shall be produced for inspection
9 and copying by Plaintiff's counsel as those documents are kept in the normal course of business at
10 the location(s) where the documents responsive to these Requests are kept, or at such other time or
11 place or manner as the parties mutually agree in writing.

12 **I. INSTRUCTIONS**

13 In answering this discovery, you are required to produce all DOCUMENTS and DATA
14 responsive to these Requests below in your possession, custody or control or in the possession,
15 custody or control of your officers, employees, agents, representatives or attorneys. A
16 DOCUMENT or DATA is in your control if you have the right to obtain it from another person.

17 In interpreting this discovery, any word, words or language objected to as being "vague" or
18 "ambiguous" shall be defined in accordance with the definitions herein and alternatively, if such
19 word(s) are "vague" or "ambiguous" to you, the words shall be interpreted as defined in a standard
20 edition of Webster's Dictionary. In each instance, state the objection and the corresponding
21 definition which you are applying.

22 If any DOCUMENT or DATA responsive to these Requests was at any time in your
23 possession or custody or subject to your control but now is no longer available for production, state
24 in writing whether the DOCUMENT or DATA:

25 (a) is missing or lost;

26 (b) has been destroyed;

1 (c) has been transferred or delivered to another person or entity and at whose request;
2 (d) has been otherwise disposed of; and
3 (e) in each instance, explain the circumstances surrounding the disposition of the
4 DOCUMENT or DATA and provide the date or approximate date of the DOCUMENT or DATA's
5 disposition.

6 If you claim that any DOCUMENT or DATA responsive to any of these Requests is
7 privileged or protected and you withhold a DOCUMENT or DATA or any portion of a
8 DOCUMENT or DATA on that basis, you must expressly make the claim and support the claim by
9 a description of the nature of the DOCUMENT or DATA, communications, or things not produced
10 that is sufficient to enable Plaintiff's counsel to evaluate and/or contest your claim. You are
11 requested to provide in writing with respect to each DOCUMENT or DATA to which you claim a
12 privilege applies, a full description of the claimed basis for the asserted privilege, including the
13 following information:

- 14 (a) the nature of the privilege you claim (i.e., attorney-client, work product);
- 15 (b) on whose behalf you are asserting the privilege;
- 16 (c) the facts upon which you rely as the basis for claiming the privilege;
- 17 (d) the title (if any) and the general subject matter of the DOCUMENT or DATA;
- 18 (e) the identity of each person who prepared or authored the DOCUMENT or DATA;
- 19 (f) the date the DOCUMENT or DATA was prepared and/or transmitted;
- 20 (g) the identity of each person (if any) who signed the DOCUMENT or DATA;
- 21 (h) the identity of each person to whom the DOCUMENT or DATA was directed,
22 circulated or shown;
- 23 (i) the identity of each person who has reviewed or seen the DOCUMENT or DATA;
- 24 and
- 25 (j) the identity of each person now in possession of the DOCUMENT or DATA.

1 If any portion of a DOCUMENT is responsive to any Request, then the entire DOCUMENT
2 must be produced. If the DOCUMENT contains privileged material, produce the entire
3 DOCUMENT with the privileged material redacted, the fact of redaction so indicated, and the basis
4 of the privilege asserted in your response.

5 If two or more identical duplicate copies of a DOCUMENT exist, the most legible copy
6 should be produced for purposes of these Requests.

7 Any DOCUMENT with any marks on any sheet or side thereof, including without
8 limitation, any initials, stamped indicia, comment or notation of any character, not a part of the
9 original text, or any reproduction thereof, is to be considered a separate DOCUMENT for purposes
10 of responding to any Request.

11 Responsive DOCUMENTS or DATA shall be produced in the manner in which they were
12 kept in the ordinary course of business. Responsive DOCUMENTS shall not be shuffled or
13 otherwise rearranged. DOCUMENTS that in their original condition are stapled, clipped, or
14 otherwise fastened together shall be produced in such form. If a DOCUMENT or group of
15 DOCUMENTS is taken from a file folder, file drawer, file box or notebook for transportation to a
16 central location for Plaintiff's review, please include a copy of the label from such container of the
17 DOCUMENTS.

18 Responsive DOCUMENTS or DATA shall be produced at the location as aforementioned in
19 a manner which is responsive to a particular Request. Upon producing the requested
20 DOCUMENTS or DATA, identify the Request(s) to which any DOCUMENT or DATA or group
21 of DOCUMENTS is responsive.

22 Upon producing the requested DOCUMENTS, you may mark the lower right-hand corner
23 of each page with Bates-stamped, consecutive numbers. Please do not allow the marks to obscure
24 any information on the DOCUMENT.

25 If there are no responsive DOCUMENTS or DATA with respect to a particular request or
26 part thereof please state so in writing.

1 **II. DEFINITIONS**

2 The following definitions apply to each of the requests for documents set forth herein and
3 are deemed to be incorporated in each said request:

4 “ACTION” means *Beck v. Point Loma Patients Consumer Cooperative Corporation et al.*,
5 Case Number 37-2017-00037524-CU-BT-CTL.

6 “COMMUNICATIONS” and words derivative means the act of communicating, including
7 every manner or means of disclosure, transfer, or exchange of information (in the form of facts,
8 ideas, inquiries, or otherwise), whether orally or by document, facsimile, mail, personal delivery,
9 electronically or otherwise.

10 “COMPUTER” means all devices utilizing microchips to facilitate processing, analysis, or
11 storage of electronic information, including but not limited to desktop computers, laptop computers,
12 tablet computers, smartphones, notebook computers, smart watches, and palmtop computers (also
13 known as personal digital assistants or PDA’s).

14 “DOCUMENT(S)” is defined in the manner described by California Evidence Code § 250,
15 and is used in the broadest possible sense to include all tangible items where information is stored
16 or likely to be stored, including information or DATA recorded in any medium, whether written,
17 printed, typed, photostatic, photographed, recorded, stored on a COMPUTER or other electronic
18 form, whether comprised of letters, numbers, graphics, sound or video, whether in original, draft,
19 revision, or non-identical format (i.e., whether different from another document by reason of the
20 time of its creation, whether contemporaneously or subsequently created, or whether different from
21 another document by reason of the notations, marks or other unique characteristics), whether a
22 translation, dictation or reference to an event, whether by handwriting, typewriting, or mimeograph,
23 whether in hard document, recorded or computer R form, including COMPUTER printouts and
24 computer DATA or files, including DATA stored on ZIP or USB drives, external or internal hard
25 drives, compact discs, or other COMPUTER storage devices of any form whatsoever, and including
26 but not limited to all electronic mail (e-mail) and any instant messenger, Slack (type) channel or
27

1 similar, and including any DATA, writings, correspondence, letters, agreements, contracts,
2 memoranda, reports, calendars, date books, checks, invoices, billing statement, notebooks, notes,
3 journals, accountings, ledgers, presentations, manuals, publications, brochures, designs, proposals,
4 and whether privileged or otherwise excluded from discovery.

5 “ELECTRONIC DATA” or “DATA” means the original (or identical duplicate when the
6 original is not available), and any non-identical copies (whether non-identical because of notes
7 made on copies or attached comments, annotations, marks, transmission notations, or highlighting
8 of any kind) of DOCUMENTS of every kind and description whether inscribed by mechanical,
9 facsimile, electronic, magnetic, digital, analogy, or other means. ELECTRONIC DATA and
10 DATA includes, by way of example only, computer programs (whether private, commercial, or
11 work-in-progress), programming notes or instructions, activity listings of electronic mail
12 transmittals and/or receipts, output resulting from the use of any software program, including work
13 processing documents, spreadsheets, database files, charts, graphs and outlines, electronic mail,
14 operating systems, sources code of all types, peripheral drivers, portable document format (PDF)
15 files, batch files, ASCII files, and any and all miscellaneous files and/or file fragments, regardless
16 of the media on which they reside and regardless of whether said electronic data consists in an
17 active file, deleted file, or file fragment. ELECTRONIC DATA and DATA also include any and
18 all items stored on computer memories, hard drives, CD-ROMs, CD-R, CD-RW, DVD, Blu-ray, M-
19 Disc, removable media such as Zip disks, flash memory, USB drives, and their equivalent,
20 computer chips, including, but not limited to EDROM, PROM, RAM and ROM, on or in any other
21 vehicle for digital data storage and/or transmittal, including cloud or remote storage such as
22 Dropbox, Google Drive, OneDrive, iCloud, Evernote, and similar. The term ELECTRONIC
23 DATA and DATA also include the file, folder tabs and/or containers and labels appended to, or
24 associated with, any physical storage device associated with each original and/or copy.

25 “MEDICAL MARIJUANA” means cannabis or marijuana, and any derivative or product
26 derived therefrom, including any product containing tetrahydrocannabinol (THC) or cannabidiol
27

1 (CBD), including but not limited to, cannabis flowers, cannabis infused edibles and beverages, hash
2 oil, tinctures, concentrates, cartridges and topical cannabis such as creams, ointments, and patches.

3 “REFER(S)/(ING)” means to have as a subject of a DOCUMENT or ELECTRONIC DATA
4 the nature of the matter requested or to otherwise identify, analyze or concern the matter requested.
5 To be responsive, the subject matter of the DOCUMENT or ELECTRONIC DATA requested need
6 not be the exclusive subject, but rather, concerning the information requested.

7 “RELATE(S)/(ING)” means, without limitation, identifying, describing, discussing,
8 assessing, stating, reflecting, concerning, constituting, containing, embodying, or evidencing in any
9 way, whether directly or indirectly, the particular subject matter identified.

10 “YOU” and “YOUR” mean Defendant Far West Staffing, LLC, the responding party to
11 whom this discovery is directed, and includes any present or former company that YOU have
12 acquired, and any local, regional, national, and executive offices, divisions, or subsidiaries, and all
13 present and former directors, officers, partners, executive personnel, managers, agents or
14 employees, including their accountants, attorneys, bankers and advisors acting or purporting to act
15 on the entity’s behalf.

16 **III. RULES OF CONSTRUCTION**

17 The following rules of construction shall apply:

- 18 1. The use of the singular form of any word shall be deemed to include the plural and
19 vice versa;
- 20 2. The use of the present tense includes the past tense and vice versa;
- 21 3. The terms “any,” “all,” “each” and “every” should be understood in either their
22 most or least inclusive sense as necessary to bring within the scope of the discovery request all
23 responses that might otherwise be construed to be outside of their scope, and the term “any” is
24 particularly defined to mean each and every.
- 25 4. The use of one gender shall include all others, including masculine, feminine and
26 neutral genders, as appropriate in the context; and

1 REQUEST NO. 6:

2 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
3 that REFER or RELATE to any salary, wage, compensation, pay, remuneration, emolument,
4 benefit, kick-back, gift, donation or other transfer of value with, including, by or between, YOU
5 and any natural or legal person involved in the cultivation, growth, production, refinement, transfer,
6 carry, transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

7 REQUEST NO. 7:

8 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
9 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for, cash.

10 REQUEST NO. 8:

11 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
12 that REFER or RELATE to the cultivation, growth, production, refinement, transfer, carry,
13 transport, distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

14 REQUEST NO. 9:

15 All COMMUNICATIONS with, including, by or between, any defendant in this ACTION.

16 REQUEST NO. 10:

17 All COMMUNICATIONS with, including, by or between, any natural or legal person
18 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport, distribution,
19 sale, purchase, and/or financing of MEDICAL MARIJUANA.


20 REQUEST NO. 11:

21 All DOCUMENTS and DATA (including electronic mail and other COMMUNICATIONS)
22 that REFER or RELATE to YOUR Articles of Incorporation and any amendments thereto, all
23 bylaws and amendments thereto, and all meeting minutes.

1 DATED: December 1, 2017

Respectfully submitted,

2
3 THE RESTIS LAW FIRM, P.C.

4 
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EXHIBIT I

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and Far West Staffing, LLC

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10 Attorneys for Defendants 419 Consulting,
Adam Knopf, and Justus Henkes IV

11 **SUPERIOR COURT OF CALIFORNIA**
12 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**

13 KARL BECK, individually and on behalf
14 of all similarly situated California
residents,

15 Plaintiff,

16 v.

17 POINT LOMA PATIENTS CONSUMER
COOPERATIVE CORPORATION, A
18 California Corporation, ADAM KNOPF,
an Individual, JUSTUS H. HENKES IV, an
19 Individual, 419 CONSULTING INC., a
California Corporation, GOLDEN STATE
20 GREENS LLC, a California LLC, FAR
WEST MANAGEMENT, LLC, a
21 California LLC, FAR WEST
OPERATING, LLC, a California LLC,
22 FAR WEST STAFFING, LLC, a
California LLC, and DOES 1 through 50,
23 inclusive.

24 Defendants.

CASE NO. 37-2017-00037524-CU-BT-CTL

**DEFENDANT POINT LOMA PATIENTS
CONSUMER COOPERATIVE
CORPORATION RESPONSES TO REQUEST
FOR PRODUCTION OF DOCUMENTS**

Complaint Filed:
Trial Date:

25 **PROPOUNDING PARTY:** Plaintiff KARL BECK

26 **RESPONDING PARTY:** Defendant POINT LOMA PATIENTS CONSUMER
27 COOPERATIVE CORPORATION

28 **SET NUMBER:** One 1

1 Defendant POINT LOMA PATIENTS CONSUMER COOPERATIVE CORPORATION
2 (“Defendant” or “Responding Party”) submits the following responses and objections to plaintiff
3 KARL BECK’s (Plaintiff" or "Propounding Party") Requests for Production of Documents, Set
4 One.

5 **Responses to Request for Production of Documents**

6 **REQUEST NO. 2:**

7 All DOCUMENTS and DATA (including electronic mail and other
8 COMMUNICATIONS) that REFER or RELATE to Sinner Brothers, Inc. and/or Justus H.
9 Henkes IV, Inc.

10 **RESPONSE TO REQUEST NO. 2:**

11 Responding Party objects to this request on the grounds that information regarding tax
12 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
13 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

14 Responding Party objects to this request to the extent the request is oppressive and/or
15 merely intended to harass.

16 Responding Party objects to this request on the ground that it is not relevant to the subject
17 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
18 evidence.

19 Responding Party objects to this request to the extent it requires it to obtain and produce
20 documents from person over whom it has no control.

21 Responding Party objects to this request on the grounds it is vague, ambiguous, or
22 otherwise lacks sufficient precision to permit a response.

23 Responding Party objects to this request to the extent it calls for the production of
24 documents that it would reveal its trade secrets or other confidential research, development,
25 commercial or proprietary information, or information that may be protected by a right of privacy
26 under either the United States Constitution, Article 1 of the Constitution of the State of California
27 or any other applicable law.

28

1 Responding Party objects to this request to the extent it seeks production of documents
2 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
3 discovery of admissible evidence.

4 Responding Party objects to this request on the grounds it is overbroad and unduly
5 burdensome.

6 Responding Party objects to this request to the extent it may be construed to request the
7 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
8 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
9 attorneys for Responding Party; that contain privileged attorney-client communications; or that
10 are otherwise protected from production.

11 Responding Party objects to this request to the extent the request is oppressive and/or
12 merely intended to harass.

13 This discovery request, has in substance been previously propounded. Continuous
14 discovery into the same matter constitutes oppression and Responding Party further objects on
15 that ground.

16 Responding Party objects to this request as it assumes facts that have not been established.

17 Responding Party objects to this request to the extent the demand adversely affects third
18 persons whose privacy would be infringed by disclosure of the documents.

19 Responding Party objects to this request on the grounds it violates California state law
20 governing health information privacy including the Confidentiality of Medical Information Act,
21 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

22 **REQUEST NO. 3:**

23 All DOCUMENTS and DATA (including electronic mail and other
24 COMMUNICATIONS) that REFER or RELATE to YOUR Articles of Incorporation and
25 amendments thereto, all bylaws and amendments thereto, and all meeting minutes.
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1 **RESPONSE TO REQUEST NO. 3:**

2 Responding Party objects to this request on the grounds that information regarding tax
3 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
4 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

5 Responding Party objects to this request to the extent the request is oppressive and/or
6 merely intended to harass.

7 Responding Party objects to this request on the ground that it is not relevant to the subject
8 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Responding Party objects to this request to the extent it requires it to obtain and produce
11 documents from person over whom it has no control.

12 Responding Party objects to this request on the grounds it is vague, ambiguous, or
13 otherwise lacks sufficient precision to permit a response.

14 Responding Party objects to this request to the extent it calls for the production of
15 documents that it would reveal its trade secrets or other confidential research, development,
16 commercial or proprietary information, or information that may be protected by a right of privacy
17 under either the United States Constitution, Article 1 of the Constitution of the State of California
18 or any other applicable law.

19 Responding Party objects to this request to the extent it seeks production of documents
20 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
21 discovery of admissible evidence.

22 Responding Party objects to this request on the grounds it is overbroad and unduly
23 burdensome.

24 Responding Party objects to this request to the extent it may be construed to request the
25 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
26 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
27 attorneys for Responding Party; that contain privileged attorney-client communications; or that
28 are otherwise protected from production.

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 This discovery request, has in substance been previously propounded. Continuous
4 discovery into the same matter constitutes oppression and Responding Party further objects on
5 that ground.

6 Responding Party objects to this request as it assumes facts that have not been established.

7 Responding Party objects to this request to the extent the demand adversely affects third
8 persons whose privacy would be infringed by disclosure of the documents.

9 Responding Party objects to this request on the grounds it violates California state law
10 governing health information privacy including the Confidentiality of Medical Information Act,
11 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

12 **REQUEST NO. 4:**

13 All DOCUMENTS and DATA (including electronic mail and other
14 COMMUNICATIONS) that REFER or RELATE to any contracts or agreements, formal or
15 informal, between or among YOU and any defendant in this ACTION.

16 **RESPONSE TO REQUEST NO. 4:**

17 Responding Party objects to this request on the grounds that information regarding tax
18 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
19 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

20 Responding Party objects to this request to the extent the request is oppressive and/or
21 merely intended to harass.

22 Responding Party objects to this request on the ground that it is not relevant to the subject
23 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
24 evidence.

25 Responding Party objects to this request to the extent it requires it to obtain and produce
26 documents from person over whom it has no control.

27 Responding Party objects to this request on the grounds it is vague, ambiguous, or
28 otherwise lacks sufficient precision to permit a response.

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Responding Party objects to this request to the extent it calls for the production of documents that it would reveal its trade secrets or other confidential research, development, commercial or proprietary information, or information that may be protected by a right of privacy under either the United States Constitution, Article 1 of the Constitution of the State of California or any other applicable law.

Responding Party objects to this request to the extent it seeks production of documents that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds it is overbroad and unduly burdensome.

Responding Party objects to this request to the extent it may be construed to request the production of documents prepared in anticipation of litigation; that constitute or reflect attorney work product; that disclose the mental impressions, conclusions, opinions or legal theories of any attorneys for Responding Party; that contain privileged attorney-client communications; or that are otherwise protected from production.

Responding Party objects to this request to the extent the request is oppressive and/or merely intended to harass.

This discovery request, has in substance been previously propounded. Continuous discovery into the same matter constitutes oppression and Responding Party further objects on that ground.

Responding Party objects to this request as it assumes facts that have not been established.

Responding Party objects to this request to the extent the demand adversely affects third persons whose privacy would be infringed by disclosure of the documents.

Responding Party objects to this request on the grounds it violates California state law governing health information privacy including the Confidentiality of Medical Information Act, California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

1 **REQUEST NO. 5:**

2 All COMMUNICATIONS with, including, by or between, any defendant in this
3 ACTION.

4 **RESPONSE TO REQUEST NO. 5:**

5 Responding Party objects to this request on the grounds that information regarding tax
6 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
7 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

8 Responding Party objects to this request to the extent the request is oppressive and/or
9 merely intended to harass.

10 Responding Party objects to this request on the ground that it is not relevant to the subject
11 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
12 evidence.

13 Responding Party objects to this request to the extent it requires it to obtain and produce
14 documents from person over whom it has no control.

15 Responding Party objects to this request on the grounds it is vague, ambiguous, or
16 otherwise lacks sufficient precision to permit a response.

17 Responding Party objects to this request to the extent it calls for the production of
18 documents that it would reveal its trade secrets or other confidential research, development,
19 commercial or proprietary information, or information that may be protected by a right of privacy
20 under either the United States Constitution, Article 1 of the Constitution of the State of California
21 or any other applicable law.

22 Responding Party objects to this request to the extent it seeks production of documents
23 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
24 discovery of admissible evidence.

25 Responding Party objects to this request on the grounds it is overbroad and unduly
26 burdensome.

27 Responding Party objects to this request to the extent it may be construed to request the
28 production of documents prepared in anticipation of litigation; that constitute or reflect attorney

1 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
2 attorneys for Responding Party; that contain privileged attorney-client communications; or that
3 are otherwise protected from production.

4 Responding Party objects to this request to the extent the request is oppressive and/or
5 merely intended to harass.

6 This discovery request, has in substance been previously propounded. Continuous
7 discovery into the same matter constitutes oppression and Responding Party further objects on
8 that ground.

9 Responding Party objects to this request as it assumes facts that have not been established.

10 Responding Party objects to this request to the extent the demand adversely affects third
11 persons whose privacy would be infringed by disclosure of the documents.

12 Responding Party objects to this request on the grounds it violates California state law
13 governing health information privacy including the Confidentiality of Medical Information Act,
14 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

15 **REQUEST NO. 6:**

16 ALL COMMUNICATIONS with, including, by or between, any natural or legal person
17 RELATED to the cultivation, growth, refinement, transfer, carry, transport, distribution, sale,
18 purchase, and/or financing of MEDICAL MARIJUANA.

19 **RESPONSE TO REQUEST NO. 6:**

20 Responding Party objects to this request on the grounds that information regarding tax
21 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
22 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

23 Responding Party objects to this request to the extent the request is oppressive and/or
24 merely intended to harass.

25 Responding Party objects to this request on the ground that it is not relevant to the subject
26 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
27 evidence.

1 Responding Party objects to this request to the extent it requires it to obtain and produce
2 documents from person over whom it has no control.

3 Responding Party objects to this request on the grounds it is vague, ambiguous, or
4 otherwise lacks sufficient precision to permit a response.

5 Responding Party objects to this request to the extent it calls for the production of
6 documents that it would reveal its trade secrets or other confidential research, development,
7 commercial or proprietary information, or information that may be protected by a right of privacy
8 under either the United States Constitution, Article 1 of the Constitution of the State of California
9 or any other applicable law.

10 Responding Party objects to this request to the extent it seeks production of documents
11 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
12 discovery of admissible evidence.

13 Responding Party objects to this request on the grounds it is overbroad and unduly
14 burdensome.

15 Responding Party objects to this request to the extent it may be construed to request the
16 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
17 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
18 attorneys for Responding Party; that contain privileged attorney-client communications; or that
19 are otherwise protected from production.

20 Responding Party objects to this request to the extent the request is oppressive and/or
21 merely intended to harass.

22 This discovery request, has in substance been previously propounded. Continuous
23 discovery into the same matter constitutes oppression and Responding Party further objects on
24 that ground.

25 Responding Party objects to this request as it assumes facts that have not been established.

26 Responding Party objects to this request to the extent the demand adversely affects third
27 persons whose privacy would be infringed by disclosure of the documents.
28

1 Responding Party objects to this request on the grounds it violates California state law
2 governing health information privacy including the Confidentiality of Medical Information Act,
3 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

4 **REQUEST NO 7:**

5 All DOCUMENTS and DATA (including electronic mail and other communications) that
6 REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for, cash.

7 **RESPONSE TO REQUEST NO. 7:**

8 Responding Party objects to this request on the grounds that information regarding tax
9 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
10 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

11 Responding Party objects to this request to the extent the request is oppressive and/or
12 merely intended to harass.

13 Responding Party objects to this request on the ground that it is not relevant to the subject
14 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
15 evidence.

16 Responding Party objects to this request to the extent it requires it to obtain and produce
17 documents from person over whom it has no control.

18 Responding Party objects to this request on the grounds it is vague, ambiguous, or
19 otherwise lacks sufficient precision to permit a response.

20 Responding Party objects to this request to the extent it calls for the production of
21 documents that it would reveal its trade secrets or other confidential research, development,
22 commercial or proprietary information, or information that may be protected by a right of privacy
23 under either the United States Constitution, Article 1 of the Constitution of the State of California
24 or any other applicable law.

25 Responding Party objects to this request to the extent it seeks production of documents
26 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
27 discovery of admissible evidence.

1 Responding Party objects to this request on the grounds it is overbroad and unduly
2 burdensome.

3 Responding Party objects to this request to the extent it may be construed to request the
4 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
5 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
6 attorneys for Responding Party; that contain privileged attorney-client communications; or that
7 are otherwise protected from production.

8 Responding Party objects to this request to the extent the request is oppressive and/or
9 merely intended to harass.

10 Responding Party objects to this request to the extent the request is oppressive and/or
11 merely intended to harass. This discovery request, has in substance been previously propounded. Continuous
12 discovery into the same matter constitutes oppression and Responding Party further objects on
13 that ground.

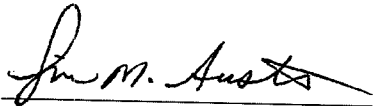
14 Responding Party objects to this request as it assumes facts that have not been established.

15 Responding Party objects to this request to the extent the demand adversely affects third
16 persons whose privacy would be infringed by disclosure of the documents.

17 Responding Party objects to this request on the grounds it violates California state law
18 governing health information privacy including the Confidentiality of Medical Information Act,
19 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

20 DATED: February 5, 2018

AUSTIN LEGAL GROUP, APC

21 By: 
22 Gina Austin/Tamara Leetham
23 Attorneys for Point Loma Patients Consumer
24 Cooperative
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VERIFICATION

I am a defendant in the above-captioned matter and have read Responses To Plaintiff's Request for Production of Documents Set One. That matters stated in Responses To Plaintiff's Request for Production of Documents Set One are true based on my own knowledge, except those matters stated on information and belief, and as to those matters I believe them to be true.

I declare under penalty of perjury under California state law that the foregoing is true and correct. Executed on February 5, 2018 at San Diego, California.

EXHIBIT J

1 Gina M. Austin (SBN 246833)
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7

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10

11 Attorneys for Defendants 419 Consulting,
Adam Knopf, and Justus Henkes IV

12 **SUPERIOR COURT OF CALIFORNIA**
13 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**

14 KARL BECK, individually and on behalf
of all similarly situated California
15 residents,

16 Plaintiff,

17 v.

18 POINT LOMA PATIENTS CONSUMER
COOPERATIVE CORPORATION, A
19 California Corporation, ADAM KNOPF,
an Individual, JUSTUS H. HENKES IV, an
20 Individual, 419 CONSULTING INC., a
California Corporation, GOLDEN STATE
21 GREENS LLC, a California LLC, FAR
WEST MANAGEMENT, LLC, a
22 California LLC, FAR WEST
OPERATING, LLC, a California LLC,
23 FAR WEST STAFFING, LLC, a
California LLC, and DOES 1 through 50,
24 inclusive.

25 Defendants.

CASE NO. 37-2017-00037524-CU-BT-CTL

**DEFENDANT ADAM KNOPF RESPONSES
TO REQUEST FOR PRODUCTION OF
DOCUMENTS (SET ONE)**

26 **PROPOUNDING PARTY:** Plaintiff KARL BECK

27 **RESPONDING PARTY:** Defendant ADAM KNOPF

28 **SET NUMBER:** One

1 Defendant ADAM KNOPF ("Defendant" or "Responding Party") submits the following
2 responses and objections to plaintiff KARL BECK's (Plaintiff" or "Propounding Party") Requests
3 for Production of Documents, Set One.

4 **Responses To Request for Production of Documents**

5 **REQUEST NO. 1:**

6 All DOCUMENTS and DATA (including electronic mail and other
7 COMMUNICATIONS) that REFER or RELATE to any contracts or agreements, formal or
8 informal, between or among YOU and any defendant in this ACTION.

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

10 Responding Party objects to this request on the grounds that information regarding tax
11 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
12 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

13 Responding Party objects to this request to the extent the request is oppressive and/or
14 merely intended to harass.

15 Responding Party objects to this request on the ground that it is not relevant to the subject
16 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
17 evidence.

18 Responding Party objects to this request to the extent it requires it to obtain and produce
19 documents from person over whom it has no control.

20 Responding Party objects to this request on the grounds it is vague, ambiguous, or
21 otherwise lacks sufficient precision to permit a response.

22 Responding Party objects to this request to the extent it calls for the production of
23 documents that it would reveal its trade secrets or other confidential research, development,
24 commercial or proprietary information, or information that may be protected by a right of privacy
25 under either the United States Constitution, Article 1 of the Constitution of the State of California
26 or any other applicable law.

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1 Responding Party objects to this request to the extent it seeks production of documents
2 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
3 discovery of admissible evidence.

4 Responding Party objects to this request on the grounds it is overbroad and unduly
5 burdensome.

6 Responding Party objects to this request to the extent it may be construed to request the
7 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
8 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
9 attorneys for Responding Party; that contain privileged attorney-client communications; or that
10 are otherwise protected from production.

11 Responding Party objects to this request to the extent the request is oppressive and/or
12 merely intended to harass.

13 This discovery request, has in substance been previously propounded. Continuous
14 discovery into the same matter constitutes oppression and Responding Party further objects on
15 that ground.

16 Responding Party objects to this request as it assumes facts that have not been established.

17 Responding Party objects to this request to the extent the demand adversely affects third
18 persons whose privacy would be infringed by disclosure of the documents.

19 Responding Party objects to this request on the grounds it violates California state law
20 governing health information privacy including the Confidentiality of Medical Information Act,
21 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

22 **REQUEST NO. 2:**

23 All DOCUMENTS and DATA (including electronic mail and other
24 COMMUNICATIONS) that REFER or RELATE to YOUR tax returns.

25 **RESPONSE TO REQUEST NO. 2:**

26 Responding Party objects to this request on the grounds that information regarding tax
27 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
28 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 Responding Party objects to this request on the ground that it is not relevant to the subject
4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request to the extent it requires it to obtain and produce
7 documents from person over whom it has no control.

8 Responding Party objects to this request on the grounds it is vague, ambiguous, or
9 otherwise lacks sufficient precision to permit a response.

10 Responding Party objects to this request to the extent it calls for the production of
11 documents that it would reveal its trade secrets or other confidential research, development,
12 commercial or proprietary information, or information that may be protected by a right of privacy
13 under either the United States Constitution, Article 1 of the Constitution of the State of California
14 or any other applicable law.

15 Responding Party objects to this request to the extent it seeks production of documents
16 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
17 discovery of admissible evidence.

18 Responding Party objects to this request on the grounds it is overbroad and unduly
19 burdensome.

20 Responding Party objects to this request to the extent it may be construed to request the
21 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
22 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
23 attorneys for Responding Party; that contain privileged attorney-client communications; or that
24 are otherwise protected from production.

25 Responding Party objects to this request to the extent the request is oppressive and/or
26 merely intended to harass.

27
28

1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

4 Responding Party objects to this request as it assumes facts that have not been established.

5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 3:**

11 All of YOUR bank statements.

12 **RESPONSE TO REQUEST NO. 3:**

13 Responding Party objects to this request on the grounds that information regarding tax
14 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
15 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

16 Responding Party objects to this request to the extent the request is oppressive and/or
17 merely intended to harass.

18 Responding Party objects to this request on the ground that it is not relevant to the subject
19 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Responding Party objects to this request to the extent it requires it to obtain and produce
22 documents from person over whom it has no control.

23 Responding Party objects to this request on the grounds it is vague, ambiguous, or
24 otherwise lacks sufficient precision to permit a response.

25 Responding Party objects to this request to the extent it calls for the production of
26 documents that it would reveal its trade secrets or other confidential research, development,
27 commercial or proprietary information, or information that may be protected by a right of privacy
28

1 under either the United States Constitution, Article 1 of the Constitution of the State of California
2 or any other applicable law.

3 Responding Party objects to this request to the extent it seeks production of documents
4 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
5 discovery of admissible evidence.

6 Responding Party objects to this request on the grounds it is overbroad and unduly
7 burdensome.

8 Responding Party objects to this request to the extent it may be construed to request the
9 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
10 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
11 attorneys for Responding Party; that contain privileged attorney-client communications; or that
12 are otherwise protected from production.

13 Responding Party objects to this request to the extent the request is oppressive and/or
14 merely intended to harass.

15 This discovery request, has in substance been previously propounded. Continuous
16 discovery into the same matter constitutes oppression and Responding Party further objects on
17 that ground.

18 Responding Party objects to this request as it assumes facts that have not been established.

19 Responding Party objects to this request to the extent the demand adversely affects third
20 persons whose privacy would be infringed by disclosure of the documents.

21 Responding Party objects to this request on the grounds it violates California state law
22 governing health information privacy including the Confidentiality of Medical Information Act,
23 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

24 **REQUEST NO. 4:**

25 All DOCUMENTS and DATA (including electronic mail and other
26 COMMUNICATIONS) that REFER or RELATE to YOUR expenses RELATING to MEDICAL
27 MARIJUANA, including but not limited to rent, utilities, insurance, fees, wages, taxes, interest,
28 supplies, maintenance, travel, meals and entertainment, and training.

1 **RESPONSE TO REQUEST NO. 4:**

2 Responding Party objects to this request on the grounds that information regarding tax
3 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
4 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

5 Responding Party objects to this request to the extent the request is oppressive and/or
6 merely intended to harass.

7 Responding Party objects to this request on the ground that it is not relevant to the subject
8 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Responding Party objects to this request to the extent it requires it to obtain and produce
11 documents from person over whom it has no control.

12 Responding Party objects to this request on the grounds it is vague, ambiguous, or
13 otherwise lacks sufficient precision to permit a response.

14 Responding Party objects to this request to the extent it calls for the production of
15 documents that it would reveal its trade secrets or other confidential research, development,
16 commercial or proprietary information, or information that may be protected by a right of privacy
17 under either the United States Constitution, Article 1 of the Constitution of the State of California
18 or any other applicable law.

19 Responding Party objects to this request to the extent it seeks production of documents
20 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
21 discovery of admissible evidence.

22 Responding Party objects to this request on the grounds it is overbroad and unduly
23 burdensome.

24 Responding Party objects to this request to the extent it may be construed to request the
25 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
26 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
27 attorneys for Responding Party; that contain privileged attorney-client communications; or that
28 are otherwise protected from production.

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 This discovery request, has in substance been previously propounded. Continuous
4 discovery into the same matter constitutes oppression and Responding Party further objects on
5 that ground.

6 Responding Party objects to this request as it assumes facts that have not been established.

7 Responding Party objects to this request to the extent the demand adversely affects third
8 persons whose privacy would be infringed by disclosure of the documents.

9 Responding Party objects to this request on the grounds it violates California state law
10 governing health information privacy including the Confidentiality of Medical Information Act,
11 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

12 **REQUEST NO. 5:**

13 All DOCUMENTS and DATA (including electronic mail and other
14 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
15 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
16 including, by or between, YOU and any defendant in this ACTION.

17 **RESPONSE TO REQUEST NO. 5:**

18 Responding Party objects to this request on the grounds that information regarding tax
19 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
20 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

21 Responding Party objects to this request to the extent the request is oppressive and/or
22 merely intended to harass.

23 Responding Party objects to this request on the ground that it is not relevant to the subject
24 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Responding Party objects to this request to the extent it requires it to obtain and produce
27 documents from person over whom it has no control.

28

1 Responding Party objects to this request on the grounds it is vague, ambiguous, or
2 otherwise lacks sufficient precision to permit a response.

3 Responding Party objects to this request to the extent it calls for the production of
4 documents that it would reveal its trade secrets or other confidential research, development,
5 commercial or proprietary information, or information that may be protected by a right of privacy
6 under either the United States Constitution, Article 1 of the Constitution of the State of California
7 or any other applicable law.

8 Responding Party objects to this request to the extent it seeks production of documents
9 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
10 discovery of admissible evidence.

11 Responding Party objects to this request on the grounds it is overbroad and unduly
12 burdensome.

13 Responding Party objects to this request to the extent it may be construed to request the
14 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
15 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
16 attorneys for Responding Party; that contain privileged attorney-client communications; or that
17 are otherwise protected from production.

18 Responding Party objects to this request to the extent the request is oppressive and/or
19 merely intended to harass.

20 This discovery request, has in substance been previously propounded. Continuous
21 discovery into the same matter constitutes oppression and Responding Party further objects on
22 that ground.

23 Responding Party objects to this request as it assumes facts that have not been established.

24 Responding Party objects to this request to the extent the demand adversely affects third
25 persons whose privacy would be infringed by disclosure of the documents.

26 Responding Party objects to this request on the grounds it violates California state law
27 governing health information privacy including the Confidentiality of Medical Information Act,
28 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

1 **REQUEST NO. 6:**

2 All DOCUMENTS and DATA (including electronic mail and other
3 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
4 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
5 including, by or between, YOU an any natural or legal person involved in the cultivation, growth,
6 production, refinement, transfer, carry, transport, distribution, sale, purchase, and/or financing of
7 MEDICAL MARIJUANA.

8 **RESPONSE TO REQUEST NO. 6:**

9 Responding Party objects to this request on the grounds that information regarding tax
10 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
11 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

12 Responding Party objects to this request to the extent the request is oppressive and/or
13 merely intended to harass.

14 Responding Party objects to this request on the ground that it is not relevant to the subject
15 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
16 evidence.

17 Responding Party objects to this request to the extent it requires it to obtain and produce
18 documents from person over whom it has no control.

19 Responding Party objects to this request on the grounds it is vague, ambiguous, or
20 otherwise lacks sufficient precision to permit a response.

21 Responding Party objects to this request to the extent it calls for the production of
22 documents that it would reveal its trade secrets or other confidential research, development,
23 commercial or proprietary information, or information that may be protected by a right of privacy
24 under either the United States Constitution, Article 1 of the Constitution of the State of California
25 or any other applicable law.

26 Responding Party objects to this request to the extent it seeks production of documents
27 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
28 discovery of admissible evidence.

1 Responding Party objects to this request on the grounds it is overbroad and unduly
2 burdensome.

3 Responding Party objects to this request to the extent it may be construed to request the
4 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
5 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
6 attorneys for Responding Party; that contain privileged attorney-client communications; or that
7 are otherwise protected from production.

8 Responding Party objects to this request to the extent the request is oppressive and/or
9 merely intended to harass.

10 This discovery request, has in substance been previously propounded. Continuous
11 discovery into the same matter constitutes oppression and Responding Party further objects on
12 that ground.

13 Responding Party objects to this request as it assumes facts that have not been established.

14 Responding Party objects to this request to the extent the demand adversely affects third
15 persons whose privacy would be infringed by disclosure of the documents.

16 Responding Party objects to this request on the grounds it violates California state law
17 governing health information privacy including the Confidentiality of Medical Information Act,
18 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

19 **REQUEST NO. 7:**

20 All DOCUMENTS and DATA (including electronic mail and other
21 COMMUNICATIONS) that REFER or RELATE to YOUR payment in, payment to, handling of,
22 and accounting for, cash.

23 **RESPONSE TO REQUEST NO. 7:**

24 Responding Party objects to this request on the grounds that information regarding tax
25 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
26 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

27 Responding Party objects to this request to the extent the request is oppressive and/or
28 merely intended to harass.

1 Responding Party objects to this request on the ground that it is not relevant to the subject
2 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Responding Party objects to this request to the extent it requires it to obtain and produce
5 documents from person over whom it has no control.

6 Responding Party objects to this request on the grounds it is vague, ambiguous, or
7 otherwise lacks sufficient precision to permit a response.

8 Responding Party objects to this request to the extent it calls for the production of
9 documents that it would reveal its trade secrets or other confidential research, development,
10 commercial or proprietary information, or information that may be protected by a right of privacy
11 under either the United States Constitution, Article 1 of the Constitution of the State of California
12 or any other applicable law.

13 Responding Party objects to this request to the extent it seeks production of documents
14 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
15 discovery of admissible evidence.

16 Responding Party objects to this request on the grounds it is overbroad and unduly
17 burdensome.

18 Responding Party objects to this request to the extent it may be construed to request the
19 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
20 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
21 attorneys for Responding Party; that contain privileged attorney-client communications; or that
22 are otherwise protected from production.

23 Responding Party objects to this request to the extent the request is oppressive and/or
24 merely intended to harass.

25 This discovery request, has in substance been previously propounded. Continuous
26 discovery into the same matter constitutes oppression and Responding Party further objects on
27 that ground.

28 Responding Party objects to this request as it assumes facts that have not been established.

1 Responding Party objects to this request to the extent the demand adversely affects third
2 persons whose privacy would be infringed by disclosure of the documents.

3 Responding Party objects to this request on the grounds it violates California state law
4 governing health information privacy including the Confidentiality of Medical Information Act,
5 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

6 **REQUEST NO. 8:**

7 All DOCUMENTS and DATA (including electronic mail and other
8 COMMUNICATIONS) that REFER or RELATE to the cultivation, growth, production,
9 refinement, transfer, carry, transport, distribution, sale, purchase, and/or financing of MEDICAL
10 MARIJUANA.

11 **RESPONSE TO REQUEST NO. 8:**

12 Responding Party objects to this request on the grounds that information regarding tax
13 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
14 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

15 Responding Party objects to this request to the extent the request is oppressive and/or
16 merely intended to harass.

17 Responding Party objects to this request on the ground that it is not relevant to the subject
18 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
19 evidence.

20 Responding Party objects to this request to the extent it requires it to obtain and produce
21 documents from person over whom it has no control.

22 Responding Party objects to this request on the grounds it is vague, ambiguous, or
23 otherwise lacks sufficient precision to permit a response.

24 Responding Party objects to this request to the extent it calls for the production of
25 documents that it would reveal its trade secrets or other confidential research, development,
26 commercial or proprietary information, or information that may be protected by a right of privacy
27 under either the United States Constitution, Article 1 of the Constitution of the State of California
28 or any other applicable law.

1 Responding Party objects to this request to the extent it seeks production of documents
2 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
3 discovery of admissible evidence.

4 Responding Party objects to this request on the grounds it is overbroad and unduly
5 burdensome.

6 Responding Party objects to this request to the extent it may be construed to request the
7 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
8 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
9 attorneys for Responding Party; that contain privileged attorney-client communications; or that
10 are otherwise protected from production.

11 Responding Party objects to this request to the extent the request is oppressive and/or
12 merely intended to harass.

13 This discovery request, has in substance been previously propounded. Continuous
14 discovery into the same matter constitutes oppression and Responding Party further objects on
15 that ground.

16 Responding Party objects to this request as it assumes facts that have not been established.

17 Responding Party objects to this request to the extent the demand adversely affects third
18 persons whose privacy would be infringed by disclosure of the documents.

19 Responding Party objects to this request on the grounds it violates California state law
20 governing health information privacy including the Confidentiality of Medical Information Act,
21 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

22 **REQUEST NO. 9:**

23 All COMMUNICATIONS with, including, by or between, any defendant in this
24 ACTION.

25 **RESPONSE TO REQUEST NO. 9:**

26 Responding Party objects to this request on the grounds that information regarding tax
27 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
28 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 Responding Party objects to this request on the ground that it is not relevant to the subject
4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request to the extent it requires it to obtain and produce
7 documents from person over whom it has no control.

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9 otherwise lacks sufficient precision to permit a response.

10 Responding Party objects to this request to the extent it calls for the production of
11 documents that it would reveal its trade secrets or other confidential research, development,
12 commercial or proprietary information, or information that may be protected by a right of privacy
13 under either the United States Constitution, Article 1 of the Constitution of the State of California
14 or any other applicable law.

15 Responding Party objects to this request to the extent it seeks production of documents
16 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
17 discovery of admissible evidence.

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19 burdensome.

20 Responding Party objects to this request to the extent it may be construed to request the
21 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
22 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
23 attorneys for Responding Party; that contain privileged attorney-client communications; or that
24 are otherwise protected from production.

25 Responding Party objects to this request to the extent the request is oppressive and/or
26 merely intended to harass.

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1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

4 Responding Party objects to this request as it assumes facts that have not been established.

5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 10:**

11 All COMMUNICATIONS with, including, by or between, any natural or legal person
12 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport,
13 distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

14 **RESPONSE TO REQUEST NO. 10:**

15 Responding Party objects to this request on the grounds that information regarding tax
16 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
17 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

18 Responding Party objects to this request to the extent the request is oppressive and/or
19 merely intended to harass.

20 Responding Party objects to this request on the ground that it is not relevant to the subject
21 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Responding Party objects to this request to the extent it requires it to obtain and produce
24 documents from person over whom it has no control.

25 Responding Party objects to this request on the grounds it is vague, ambiguous, or
26 otherwise lacks sufficient precision to permit a response.

27 Responding Party objects to this request to the extent it calls for the production of
28 documents that it would reveal its trade secrets or other confidential research, development,

1 commercial or proprietary information, or information that may be protected by a right of privacy
2 under either the United States Constitution, Article 1 of the Constitution of the State of California
3 or any other applicable law.

4 Responding Party objects to this request to the extent it seeks production of documents
5 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
6 discovery of admissible evidence.

7 Responding Party objects to this request on the grounds it is overbroad and unduly
8 burdensome.

9 Responding Party objects to this request to the extent it may be construed to request the
10 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
11 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
12 attorneys for Responding Party; that contain privileged attorney-client communications; or that
13 are otherwise protected from production.

14 Responding Party objects to this request to the extent the request is oppressive and/or
15 merely intended to harass.

16 This discovery request, has in substance been previously propounded. Continuous
17 discovery into the same matter constitutes oppression and Responding Party further objects on
18 that ground.

19 Responding Party objects to this request as it assumes facts that have not been established.

20 Responding Party objects to this request to the extent the demand adversely affects third
21 persons whose privacy would be infringed by disclosure of the documents.

22 Responding Party objects to this request on the grounds it violates California state law
23 governing health information privacy including the Confidentiality of Medical Information Act,
24 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

25 DATED: February 5, 2018

AUSTIN LEGAL GROUP, APC


26
27 By: 
Matthew Dart
Attorneys for Adam Knopf

EXHIBIT K

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11 Attorneys for Defendants 419 Consulting,
Adam Knopf, and Justus Henkes IV

12 **SUPERIOR COURT OF CALIFORNIA**
13 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**

14 KARL BECK, individually and on behalf
of all similarly situated California
15 residents,

16 Plaintiff,

17 v.

18 POINT LOMA PATIENTS CONSUMER
COOPERATIVE CORPORATION, A
19 California Corporation, ADAM KNOPF,
an Individual, JUSTUS H. HENKES IV, an
20 Individual, 419 CONSULTING INC., a
California Corporation, GOLDEN STATE
21 GREENS LLC, a California LLC, FAR
WEST MANAGEMENT, LLC, a
22 California LLC, FAR WEST
OPERATING, LLC, a California LLC,
23 FAR WEST STAFFING, LLC, a
California LLC, and DOES 1 through 50,
24 inclusive.

25 Defendants.

CASE NO. 37-2017-00037524-CU-BT-CTL

**DEFENDANT JUSTUS HENKES'S
RESPONSES TO REQUEST FOR
PRODUCTION OF DOCUMENTS (SET
ONE)**

26 **PROPOUNDING PARTY:** Plaintiff KARL BECK

27 **RESPONDING PARTY:** Defendant JUSTUS HENKES

28 **SET NUMBER:** One

1 Defendant JUSTUS HENKES (“Defendant” or “Responding Party”) submits the
2 following responses and objections to plaintiff KARL BECK’s (Plaintiff” or “Propounding
3 Party”) Requests for Production of Documents, Set One.

4 **Responses To Request for Production of Documents**

5 **REQUEST NO. 1:**

6 All DOCUMENTS and DATA (including electronic mail and other
7 COMMUNICATIONS) that REFER or RELATE to any contracts or agreements, formal or
8 informal, between or among YOU and any defendant in this ACTION.

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

10 Responding Party objects to this request on the grounds that information regarding tax
11 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
12 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

13 Responding Party objects to this request to the extent the request is oppressive and/or
14 merely intended to harass.

15 Responding Party objects to this request on the ground that it is not relevant to the subject
16 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
17 evidence.

18 Responding Party objects to this request to the extent it requires it to obtain and produce
19 documents from person over whom it has no control.

20 Responding Party objects to this request on the grounds it is vague, ambiguous, or
21 otherwise lacks sufficient precision to permit a response.

22 Responding Party objects to this request to the extent it calls for the production of
23 documents that it would reveal its trade secrets or other confidential research, development,
24 commercial or proprietary information, or information that may be protected by a right of privacy
25 under either the United States Constitution, Article 1 of the Constitution of the State of California
26 or any other applicable law.

1 Responding Party objects to this request to the extent it seeks production of documents
2 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
3 discovery of admissible evidence.

4 Responding Party objects to this request on the grounds it is overbroad and unduly
5 burdensome.

6 Responding Party objects to this request to the extent it may be construed to request the
7 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
8 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
9 attorneys for Responding Party; that contain privileged attorney-client communications; or that
10 are otherwise protected from production.

11 Responding Party objects to this request to the extent the request is oppressive and/or
12 merely intended to harass.

13 This discovery request, has in substance been previously propounded. Continuous
14 discovery into the same matter constitutes oppression and Responding Party further objects on
15 that ground.

16 Responding Party objects to this request as it assumes facts that have not been established.

17 Responding Party objects to this request to the extent the demand adversely affects third
18 persons whose privacy would be infringed by disclosure of the documents.

19 Responding Party objects to this request on the grounds it violates California state law
20 governing health information privacy including the Confidentiality of Medical Information Act,
21 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

22 **REQUEST NO. 2:**

23 All DOCUMENTS and DATA (including electronic mail and other
24 COMMUNICATIONS) that REFER or RELATE to YOUR tax returns.

25 **RESPONSE TO REQUEST NO. 2:**

26 Responding Party objects to this request on the grounds that information regarding tax
27 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
28 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 Responding Party objects to this request on the ground that it is not relevant to the subject
4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request to the extent it requires it to obtain and produce
7 documents from person over whom it has no control.

8 Responding Party objects to this request on the grounds it is vague, ambiguous, or
9 otherwise lacks sufficient precision to permit a response.

10 Responding Party objects to this request to the extent it calls for the production of
11 documents that it would reveal its trade secrets or other confidential research, development,
12 commercial or proprietary information, or information that may be protected by a right of privacy
13 under either the United States Constitution, Article 1 of the Constitution of the State of California
14 or any other applicable law.

15 Responding Party objects to this request to the extent it seeks production of documents
16 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
17 discovery of admissible evidence.

18 Responding Party objects to this request on the grounds it is overbroad and unduly
19 burdensome.

20 Responding Party objects to this request to the extent it may be construed to request the
21 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
22 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
23 attorneys for Responding Party; that contain privileged attorney-client communications; or that
24 are otherwise protected from production.

25 Responding Party objects to this request to the extent the request is oppressive and/or
26 merely intended to harass.

1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

4 Responding Party objects to this request as it assumes facts that have not been established.

5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 3:**

11 All of YOUR bank statements.

12 **RESPONSE TO REQUEST NO. 3:**

13 Responding Party objects to this request on the grounds that information regarding tax
14 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
15 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

16 Responding Party objects to this request to the extent the request is oppressive and/or
17 merely intended to harass.

18 Responding Party objects to this request on the ground that it is not relevant to the subject
19 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Responding Party objects to this request to the extent it requires it to obtain and produce
22 documents from person over whom it has no control.

23 Responding Party objects to this request on the grounds it is vague, ambiguous, or
24 otherwise lacks sufficient precision to permit a response.

25 Responding Party objects to this request to the extent it calls for the production of
26 documents that it would reveal its trade secrets or other confidential research, development,
27 commercial or proprietary information, or information that may be protected by a right of privacy
28

1 under either the United States Constitution, Article 1 of the Constitution of the State of California
2 or any other applicable law.

3 Responding Party objects to this request to the extent it seeks production of documents
4 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
5 discovery of admissible evidence.

6 Responding Party objects to this request on the grounds it is overbroad and unduly
7 burdensome.

8 Responding Party objects to this request to the extent it may be construed to request the
9 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
10 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
11 attorneys for Responding Party; that contain privileged attorney-client communications; or that
12 are otherwise protected from production.

13 Responding Party objects to this request to the extent the request is oppressive and/or
14 merely intended to harass.

15 This discovery request, has in substance been previously propounded. Continuous
16 discovery into the same matter constitutes oppression and Responding Party further objects on
17 that ground.

18 Responding Party objects to this request as it assumes facts that have not been established.

19 Responding Party objects to this request to the extent the demand adversely affects third
20 persons whose privacy would be infringed by disclosure of the documents.

21 Responding Party objects to this request on the grounds it violates California state law
22 governing health information privacy including the Confidentiality of Medical Information Act,
23 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

24 **REQUEST NO. 4:**

25 All DOCUMENTS and DATA (including electronic mail and other
26 COMMUNICATIONS) that REFER or RELATE to YOUR expenses, including but not limited
27 to rent, utilities, insurance, fees, wages, taxes, interest, supplies, maintenance, travel, meal and
28 entertainment, and training.

1 **RESPONSE TO REQUEST NO. 4:**

2 Responding Party objects to this request on the grounds that information regarding tax
3 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
4 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

5 Responding Party objects to this request to the extent the request is oppressive and/or
6 merely intended to harass.

7 Responding Party objects to this request on the ground that it is not relevant to the subject
8 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Responding Party objects to this request to the extent it requires it to obtain and produce
11 documents from person over whom it has no control.

12 Responding Party objects to this request on the grounds it is vague, ambiguous, or
13 otherwise lacks sufficient precision to permit a response.

14 Responding Party objects to this request to the extent it calls for the production of
15 documents that it would reveal its trade secrets or other confidential research, development,
16 commercial or proprietary information, or information that may be protected by a right of privacy
17 under either the United States Constitution, Article 1 of the Constitution of the State of California
18 or any other applicable law.

19 Responding Party objects to this request to the extent it seeks production of documents
20 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
21 discovery of admissible evidence.

22 Responding Party objects to this request on the grounds it is overbroad and unduly
23 burdensome.

24 Responding Party objects to this request to the extent it may be construed to request the
25 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
26 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
27 attorneys for Responding Party; that contain privileged attorney-client communications; or that
28 are otherwise protected from production.

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 This discovery request, has in substance been previously propounded. Continuous
4 discovery into the same matter constitutes oppression and Responding Party further objects on
5 that ground.

6 Responding Party objects to this request as it assumes facts that have not been established.

7 Responding Party objects to this request to the extent the demand adversely affects third
8 persons whose privacy would be infringed by disclosure of the documents.

9 Responding Party objects to this request on the grounds it violates California state law
10 governing health information privacy including the Confidentiality of Medical Information Act,
11 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

12 **REQUEST NO. 5:**

13 All DOCUMENTS and DATA (including electronic mail and other
14 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
15 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
16 including, by or between, YOU and any defendant in this ACTION.

17 **RESPONSE TO REQUEST NO. 5:**

18 Responding Party objects to this request on the grounds that information regarding tax
19 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
20 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

21 Responding Party objects to this request to the extent the request is oppressive and/or
22 merely intended to harass.

23 Responding Party objects to this request on the ground that it is not relevant to the subject
24 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Responding Party objects to this request to the extent it requires it to obtain and produce
27 documents from person over whom it has no control.
28

1 Responding Party objects to this request on the grounds it is vague, ambiguous, or
2 otherwise lacks sufficient precision to permit a response.

3 Responding Party objects to this request to the extent it calls for the production of
4 documents that it would reveal its trade secrets or other confidential research, development,
5 commercial or proprietary information, or information that may be protected by a right of privacy
6 under either the United States Constitution, Article 1 of the Constitution of the State of California
7 or any other applicable law.

8 Responding Party objects to this request to the extent it seeks production of documents
9 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
10 discovery of admissible evidence.

11 Responding Party objects to this request on the grounds it is overbroad and unduly
12 burdensome.

13 Responding Party objects to this request to the extent it may be construed to request the
14 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
15 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
16 attorneys for Responding Party; that contain privileged attorney-client communications; or that
17 are otherwise protected from production.

18 Responding Party objects to this request to the extent the request is oppressive and/or
19 merely intended to harass.

20 This discovery request, has in substance been previously propounded. Continuous
21 discovery into the same matter constitutes oppression and Responding Party further objects on
22 that ground.

23 Responding Party objects to this request as it assumes facts that have not been established.

24 Responding Party objects to this request to the extent the demand adversely affects third
25 persons whose privacy would be infringed by disclosure of the documents.

26 Responding Party objects to this request on the grounds it violates California state law
27 governing health information privacy including the Confidentiality of Medical Information Act,
28 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

1 **REQUEST NO. 6:**

2 All DOCUMENTS and DATA (including electronic mail and other
3 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
4 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
5 including, by or between, YOU and any natural or legal person involved in the cultivation,
6 growth, production, refinement, transfer, carry, transport, distribution, sale, purchase, and/or
7 financing of MEDICAL MARIJUANA.

8 **RESPONSE TO REQUEST NO. 6:**

9 Responding Party objects to this request on the grounds that information regarding tax
10 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
11 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

12 Responding Party objects to this request to the extent the request is oppressive and/or
13 merely intended to harass.

14 Responding Party objects to this request on the ground that it is not relevant to the subject
15 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
16 evidence.

17 Responding Party objects to this request to the extent it requires it to obtain and produce
18 documents from person over whom it has no control.

19 Responding Party objects to this request on the grounds it is vague, ambiguous, or
20 otherwise lacks sufficient precision to permit a response.

21 Responding Party objects to this request to the extent it calls for the production of
22 documents that it would reveal its trade secrets or other confidential research, development,
23 commercial or proprietary information, or information that may be protected by a right of privacy
24 under either the United States Constitution, Article 1 of the Constitution of the State of California
25 or any other applicable law.

26 Responding Party objects to this request to the extent it seeks production of documents
27 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
28 discovery of admissible evidence.

1 Responding Party objects to this request on the grounds it is overbroad and unduly
2 burdensome.

3 Responding Party objects to this request to the extent it may be construed to request the
4 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
5 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
6 attorneys for Responding Party; that contain privileged attorney-client communications; or that
7 are otherwise protected from production.

8 Responding Party objects to this request to the extent the request is oppressive and/or
9 merely intended to harass.

10 This discovery request, has in substance been previously propounded. Continuous
11 discovery into the same matter constitutes oppression and Responding Party further objects on
12 that ground.

13 Responding Party objects to this request as it assumes facts that have not been established.

14 Responding Party objects to this request to the extent the demand adversely affects third
15 persons whose privacy would be infringed by disclosure of the documents.

16 Responding Party objects to this request on the grounds it violates California state law
17 governing health information privacy including the Confidentiality of Medical Information Act,
18 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

19 **REQUEST NO. 7:**

20 All DOCUMENTS and DATA (including electronic and other COMMUNICATIONS)
21 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for,
22 cash.

23 **RESPONSE TO REQUEST NO. 7:**

24 Responding Party objects to this request on the grounds that information regarding tax
25 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
26 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

27 Responding Party objects to this request to the extent the request is oppressive and/or
28 merely intended to harass.

1 Responding Party objects to this request on the ground that it is not relevant to the subject
2 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Responding Party objects to this request to the extent it requires it to obtain and produce
5 documents from person over whom it has no control.

6 Responding Party objects to this request on the grounds it is vague, ambiguous, or
7 otherwise lacks sufficient precision to permit a response.

8 Responding Party objects to this request to the extent it calls for the production of
9 documents that it would reveal its trade secrets or other confidential research, development,
10 commercial or proprietary information, or information that may be protected by a right of privacy
11 under either the United States Constitution, Article 1 of the Constitution of the State of California
12 or any other applicable law.

13 Responding Party objects to this request to the extent it seeks production of documents
14 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
15 discovery of admissible evidence.

16 Responding Party objects to this request on the grounds it is overbroad and unduly
17 burdensome.

18 Responding Party objects to this request to the extent it may be construed to request the
19 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
20 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
21 attorneys for Responding Party; that contain privileged attorney-client communications; or that
22 are otherwise protected from production.

23 Responding Party objects to this request to the extent the request is oppressive and/or
24 merely intended to harass.

25 This discovery request, has in substance been previously propounded. Continuous
26 discovery into the same matter constitutes oppression and Responding Party further objects on
27 that ground.

28 Responding Party objects to this request as it assumes facts that have not been established.

1 Responding Party objects to this request to the extent the demand adversely affects third
2 persons whose privacy would be infringed by disclosure of the documents.

3 Responding Party objects to this request on the grounds it violates California state law
4 governing health information privacy including the Confidentiality of Medical Information Act,
5 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

6 **REQUEST NO. 8:**

7 All DOCUMENTS and DATA (including electronic mail and other
8 COMMUNICATIONS) that REFER or RELATE to the cultivation, growth, production,
9 refinement, transfer, carry, transport, distribution, sale, purchase, and/or financing of MEDICAL
10 MARIJUANA.

11 **RESPONSE TO REQUEST NO. 8:**

12 Responding Party objects to this request on the grounds that information regarding tax
13 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
14 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

15 Responding Party objects to this request to the extent the request is oppressive and/or
16 merely intended to harass.

17 Responding Party objects to this request on the ground that it is not relevant to the subject
18 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
19 evidence.

20 Responding Party objects to this request to the extent it requires it to obtain and produce
21 documents from person over whom it has no control.

22 Responding Party objects to this request on the grounds it is vague, ambiguous, or
23 otherwise lacks sufficient precision to permit a response.

24 Responding Party objects to this request to the extent it calls for the production of
25 documents that it would reveal its trade secrets or other confidential research, development,
26 commercial or proprietary information, or information that may be protected by a right of privacy
27 under either the United States Constitution, Article 1 of the Constitution of the State of California
28 or any other applicable law.

1 Responding Party objects to this request to the extent it seeks production of documents
2 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
3 discovery of admissible evidence.

4 Responding Party objects to this request on the grounds it is overbroad and unduly
5 burdensome.

6 Responding Party objects to this request to the extent it may be construed to request the
7 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
8 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
9 attorneys for Responding Party; that contain privileged attorney-client communications; or that
10 are otherwise protected from production.

11 Responding Party objects to this request to the extent the request is oppressive and/or
12 merely intended to harass.

13 This discovery request, has in substance been previously propounded. Continuous
14 discovery into the same matter constitutes oppression and Responding Party further objects on
15 that ground.

16 Responding Party objects to this request as it assumes facts that have not been established.

17 Responding Party objects to this request to the extent the demand adversely affects third
18 persons whose privacy would be infringed by disclosure of the documents.

19 Responding Party objects to this request on the grounds it violates California state law
20 governing health information privacy including the Confidentiality of Medical Information Act,
21 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

22 **REQUEST NO. 9:**

23 All COMMUNICATIONS with, including, by or between, any defendant in this
24 ACTION.

25 **RESPONSE TO REQUEST NO. 9:**

26 Responding Party objects to this request on the grounds that information regarding tax
27 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
28 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 Responding Party objects to this request on the ground that it is not relevant to the subject
4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request to the extent it requires it to obtain and produce
7 documents from person over whom it has no control.

8 Responding Party objects to this request on the grounds it is vague, ambiguous, or
9 otherwise lacks sufficient precision to permit a response.

10 Responding Party objects to this request to the extent it calls for the production of
11 documents that it would reveal its trade secrets or other confidential research, development,
12 commercial or proprietary information, or information that may be protected by a right of privacy
13 under either the United States Constitution, Article 1 of the Constitution of the State of California
14 or any other applicable law.

15 Responding Party objects to this request to the extent it seeks production of documents
16 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
17 discovery of admissible evidence.

18 Responding Party objects to this request on the grounds it is overbroad and unduly
19 burdensome.

20 Responding Party objects to this request to the extent it may be construed to request the
21 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
22 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
23 attorneys for Responding Party; that contain privileged attorney-client communications; or that
24 are otherwise protected from production.

25 Responding Party objects to this request to the extent the request is oppressive and/or
26 merely intended to harass.

27
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1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

4 Responding Party objects to this request as it assumes facts that have not been established.

5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 10:**

11 All COMMUNICATIONS with, including, by or between, any natural or legal person
12 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport,
13 distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

14 **RESPONSE TO REQUEST NO. 10:**

15 Responding Party objects to this request on the grounds that information regarding tax
16 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
17 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

18 Responding Party objects to this request to the extent the request is oppressive and/or
19 merely intended to harass.

20 Responding Party objects to this request on the ground that it is not relevant to the subject
21 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Responding Party objects to this request to the extent it requires it to obtain and produce
24 documents from person over whom it has no control.

25 Responding Party objects to this request on the grounds it is vague, ambiguous, or
26 otherwise lacks sufficient precision to permit a response.

27 Responding Party objects to this request to the extent it calls for the production of
28 documents that it would reveal its trade secrets or other confidential research, development,

1 commercial or proprietary information, or information that may be protected by a right of privacy
2 under either the United States Constitution, Article 1 of the Constitution of the State of California
3 or any other applicable law.

4 Responding Party objects to this request to the extent it seeks production of documents
5 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
6 discovery of admissible evidence.

7 Responding Party objects to this request on the grounds it is overbroad and unduly
8 burdensome.

9 Responding Party objects to this request to the extent it may be construed to request the
10 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
11 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
12 attorneys for Responding Party; that contain privileged attorney-client communications; or that
13 are otherwise protected from production.

14 Responding Party objects to this request to the extent the request is oppressive and/or
15 merely intended to harass.

16 This discovery request, has in substance been previously propounded. Continuous
17 discovery into the same matter constitutes oppression and Responding Party further objects on
18 that ground.

19 Responding Party objects to this request as it assumes facts that have not been established.

20 Responding Party objects to this request to the extent the demand adversely affects third
21 persons whose privacy would be infringed by disclosure of the documents.

22 Responding Party objects to this request on the grounds it violates California state law
23 governing health information privacy including the Confidentiality of Medical Information Act,
24 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

25 **REQUEST NO. 11:**

26 All DOCUMENTS and DATA (including electronic mail and other
27 COMMUNICATIONS) that REFER or RELATE to YOUR Articles of Incorporation and any
28 amendments thereto, all bylaws and amendments thereto, and all meeting minutes.

1 RESPONSE TO REQUEST NO. 11:

2 Responding Party objects to this request on the grounds that information regarding tax
3 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
4 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

5 Responding Party objects to this request to the extent the request is oppressive and/or
6 merely intended to harass.

7 Responding Party objects to this request on the ground that it is not relevant to the subject
8 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Responding Party objects to this request to the extent it requires it to obtain and produce
11 documents from person over whom it has no control.

12 Responding Party objects to this request on the grounds it is vague, ambiguous, or
13 otherwise lacks sufficient precision to permit a response.

14 Responding Party objects to this request to the extent it calls for the production of
15 documents that it would reveal its trade secrets or other confidential research, development,
16 commercial or proprietary information, or information that may be protected by a right of privacy
17 under either the United States Constitution, Article 1 of the Constitution of the State of California
18 or any other applicable law.

19 Responding Party objects to this request to the extent it seeks production of documents
20 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
21 discovery of admissible evidence.

22 Responding Party objects to this request on the grounds it is overbroad and unduly
23 burdensome.

24 Responding Party objects to this request to the extent it may be construed to request the
25 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
26 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
27 attorneys for Responding Party; that contain privileged attorney-client communications; or that
28 are otherwise protected from production.

EXHIBIT L

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6 Attorneys for Defendants
Point Loma Patients Consumer Cooperative,
7 Golden State Greens, LLC, Far West Management, LLC
Far West Operating, LLC, and Far West Staffing, LLC

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12 Attorneys for Defendants 419 Consulting,
Adam Knopf, and Justus Henkes IV

13 **SUPERIOR COURT OF CALIFORNIA**
14 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**

15 KARL BECK, individually and on behalf
of all similarly situated California
16 residents,

17 Plaintiff,

18 v.

19 POINT LOMA PATIENTS CONSUMER
COOPERATIVE CORPORATION, A
California Corporation, ADAM KNOPF,
20 an Individual, JUSTUS H. HENKES IV, an
Individual, 419 CONSULTING INC., a
21 California Corporation, GOLDEN STATE
GREENS LLC, a California LLC, FAR
22 WEST MANAGEMENT, LLC, a
California LLC, FAR WEST
23 OPERATING, LLC, a California LLC,
FAR WEST STAFFING, LLC, a
24 California LLC, and DOES 1 through 50,
inclusive.

25 Defendants.
26

CASE NO. 37-2017-00037524-CU-BT-CTL

**DEFENDANT 419 CONSULTING'S
RESPONSES TO REQUEST FOR
PRODUCTION OF DOCUMENTS (SET
ONE)**

27 **PROPOUNDING PARTY:** Plaintiff KARL BECK

28 **RESPONDING PARTY:** Defendant 419 consulting, llc

SET NUMBER: One

1

1 Defendant 419 Consulting, LLC ("Defendant" or "Responding Party") submits the
2 following responses and objections to plaintiff KARL BECK's (Plaintiff" or "Propounding
3 Party") Requests for Production of Documents, Set One.

4 **Responses To Request for Production of Documents**

5 **REQUEST NO. 1:**

6 All DOCUMENTS and DATA (including electronic mail and other
7 COMMUNICATIONS) that REFER or RELATE to any contracts or agreements, formal or
8 informal, between or among YOU and any defendant in this ACTION.

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

10 Responding Party objects to this request on the grounds that information regarding tax
11 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
12 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

13 Responding Party objects to this request to the extent the request is oppressive and/or
14 merely intended to harass.

15 Responding Party objects to this request on the ground that it is not relevant to the subject
16 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
17 evidence.

18 Responding Party objects to this request to the extent it requires it to obtain and produce
19 documents from person over whom it has no control.

20 Responding Party objects to this request on the grounds it is vague, ambiguous, or
21 otherwise lacks sufficient precision to permit a response.

22 Responding Party objects to this request to the extent it calls for the production of
23 documents that it would reveal its trade secrets or other confidential research, development,
24 commercial or proprietary information, or information that may be protected by a right of privacy
25 under either the United States Constitution, Article 1 of the Constitution of the State of California
26 or any other applicable law.

1 Responding Party objects to this request to the extent it seeks production of documents
2 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
3 discovery of admissible evidence.

4 Responding Party objects to this request on the grounds it is overbroad and unduly
5 burdensome.

6 Responding Party objects to this request to the extent it may be construed to request the
7 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
8 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
9 attorneys for Responding Party; that contain privileged attorney-client communications; or that
10 are otherwise protected from production.

11 Responding Party objects to this request to the extent the request is oppressive and/or
12 merely intended to harass.

13 This discovery request, has in substance been previously propounded. Continuous
14 discovery into the same matter constitutes oppression and Responding Party further objects on
15 that ground.

16 Responding Party objects to this request as it assumes facts that have not been established.

17 Responding Party objects to this request to the extent the demand adversely affects third
18 persons whose privacy would be infringed by disclosure of the documents.

19 Responding Party objects to this request on the grounds it violates California state law
20 governing health information privacy including the Confidentiality of Medical Information Act,
21 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

22 **REQUEST NO. 2:**

23 All DOCUMENTS and DATA (including electronic mail and other
24 COMMUNICATIONS) that REFER or RELATE to YOUR tax returns.

25 **RESPONSE TO REQUEST NO. 2:**

26 Responding Party objects to this request on the grounds that information regarding tax
27 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
28 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 Responding Party objects to this request on the ground that it is not relevant to the subject
4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request to the extent it requires it to obtain and produce
7 documents from person over whom it has no control.

8 Responding Party objects to this request on the grounds it is vague, ambiguous, or
9 otherwise lacks sufficient precision to permit a response.

10 Responding Party objects to this request to the extent it calls for the production of
11 documents that it would reveal its trade secrets or other confidential research, development,
12 commercial or proprietary information, or information that may be protected by a right of privacy
13 under either the United States Constitution, Article 1 of the Constitution of the State of California
14 or any other applicable law.

15 Responding Party objects to this request to the extent it seeks production of documents
16 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
17 discovery of admissible evidence.

18 Responding Party objects to this request on the grounds it is overbroad and unduly
19 burdensome.

20 Responding Party objects to this request to the extent it may be construed to request the
21 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
22 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
23 attorneys for Responding Party; that contain privileged attorney-client communications; or that
24 are otherwise protected from production.

25 Responding Party objects to this request to the extent the request is oppressive and/or
26 merely intended to harass.

27
28

1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

4 Responding Party objects to this request as it assumes facts that have not been established.

5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 3:**

11 All of YOUR bank statements.

12 **RESPONSE TO REQUEST NO. 3:**

13 Responding Party objects to this request on the grounds that information regarding tax
14 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
15 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

16 Responding Party objects to this request to the extent the request is oppressive and/or
17 merely intended to harass.

18 Responding Party objects to this request on the ground that it is not relevant to the subject
19 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Responding Party objects to this request to the extent it requires it to obtain and produce
22 documents from person over whom it has no control.

23 Responding Party objects to this request on the grounds it is vague, ambiguous, or
24 otherwise lacks sufficient precision to permit a response.

25 Responding Party objects to this request to the extent it calls for the production of
26 documents that it would reveal its trade secrets or other confidential research, development,
27 commercial or proprietary information, or information that may be protected by a right of privacy
28

1 under either the United States Constitution, Article 1 of the Constitution of the State of California
2 or any other applicable law.

3 Responding Party objects to this request to the extent it seeks production of documents
4 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
5 discovery of admissible evidence.

6 Responding Party objects to this request on the grounds it is overbroad and unduly
7 burdensome.

8 Responding Party objects to this request to the extent it may be construed to request the
9 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
10 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
11 attorneys for Responding Party; that contain privileged attorney-client communications; or that
12 are otherwise protected from production.

13 Responding Party objects to this request to the extent the request is oppressive and/or
14 merely intended to harass.

15 This discovery request, has in substance been previously propounded. Continuous
16 discovery into the same matter constitutes oppression and Responding Party further objects on
17 that ground.

18 Responding Party objects to this request as it assumes facts that have not been established.

19 Responding Party objects to this request to the extent the demand adversely affects third
20 persons whose privacy would be infringed by disclosure of the documents.

21 Responding Party objects to this request on the grounds it violates California state law
22 governing health information privacy including the Confidentiality of Medical Information Act,
23 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

24 **REQUEST NO. 4:**

25 All DOCUMENTS and DATA (including electronic mail and other
26 COMMUNICATIONS) that REFER or RELATE to YOUR expenses, including but not limited
27 to rent, utilities, insurance, fees, wages, taxes, interest, supplies, maintenance, travel, meal and
28 entertainment, and training.

1 RESPONSE TO REQUEST NO. 4:

2 Responding Party objects to this request on the grounds that information regarding tax
3 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
4 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

5 Responding Party objects to this request to the extent the request is oppressive and/or
6 merely intended to harass.

7 Responding Party objects to this request on the ground that it is not relevant to the subject
8 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Responding Party objects to this request to the extent it requires it to obtain and produce
11 documents from person over whom it has no control.

12 Responding Party objects to this request on the grounds it is vague, ambiguous, or
13 otherwise lacks sufficient precision to permit a response.

14 Responding Party objects to this request to the extent it calls for the production of
15 documents that it would reveal its trade secrets or other confidential research, development,
16 commercial or proprietary information, or information that may be protected by a right of privacy
17 under either the United States Constitution, Article 1 of the Constitution of the State of California
18 or any other applicable law.

19 Responding Party objects to this request to the extent it seeks production of documents
20 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
21 discovery of admissible evidence.

22 Responding Party objects to this request on the grounds it is overbroad and unduly
23 burdensome.

24 Responding Party objects to this request to the extent it may be construed to request the
25 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
26 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
27 attorneys for Responding Party; that contain privileged attorney-client communications; or that
28 are otherwise protected from production.

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 This discovery request, has in substance been previously propounded. Continuous
4 discovery into the same matter constitutes oppression and Responding Party further objects on
5 that ground.

6 Responding Party objects to this request as it assumes facts that have not been established.

7 Responding Party objects to this request to the extent the demand adversely affects third
8 persons whose privacy would be infringed by disclosure of the documents.

9 Responding Party objects to this request on the grounds it violates California state law
10 governing health information privacy including the Confidentiality of Medical Information Act,
11 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

12 **REQUEST NO. 5:**

13 All DOCUMENTS and DATA (including electronic mail and other
14 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
15 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
16 including, by or between, YOU and any defendant in this ACTION.

17 **RESPONSE TO REQUEST NO. 5:**

18 Responding Party objects to this request on the grounds that information regarding tax
19 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
20 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

21 Responding Party objects to this request to the extent the request is oppressive and/or
22 merely intended to harass.

23 Responding Party objects to this request on the ground that it is not relevant to the subject
24 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Responding Party objects to this request to the extent it requires it to obtain and produce
27 documents from person over whom it has no control.
28

1 Responding Party objects to this request on the grounds it is vague, ambiguous, or
2 otherwise lacks sufficient precision to permit a response.

3 Responding Party objects to this request to the extent it calls for the production of
4 documents that it would reveal its trade secrets or other confidential research, development,
5 commercial or proprietary information, or information that may be protected by a right of privacy
6 under either the United States Constitution, Article 1 of the Constitution of the State of California
7 or any other applicable law.

8 Responding Party objects to this request to the extent it seeks production of documents
9 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
10 discovery of admissible evidence.

11 Responding Party objects to this request on the grounds it is overbroad and unduly
12 burdensome.

13 Responding Party objects to this request to the extent it may be construed to request the
14 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
15 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
16 attorneys for Responding Party; that contain privileged attorney-client communications; or that
17 are otherwise protected from production.

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19 merely intended to harass.

20 This discovery request, has in substance been previously propounded. Continuous
21 discovery into the same matter constitutes oppression and Responding Party further objects on
22 that ground.

23 Responding Party objects to this request as it assumes facts that have not been established.

24 Responding Party objects to this request to the extent the demand adversely affects third
25 persons whose privacy would be infringed by disclosure of the documents.

26 Responding Party objects to this request on the grounds it violates California state law
27 governing health information privacy including the Confidentiality of Medical Information Act,
28 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

1 **REQUEST NO. 6:**

2 All DOCUMENTS and DATA (including electronic mail and other
3 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
4 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
5 including, by or between, YOU and any natural or legal person involved in the cultivation,
6 growth, production, refinement, transfer, carry, transport, distribution, sale, purchase, and/or
7 financing of MEDICAL MARIJUANA.

8 **RESPONSE TO REQUEST NO. 6:**

9 Responding Party objects to this request on the grounds that information regarding tax
10 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
11 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

12 Responding Party objects to this request to the extent the request is oppressive and/or
13 merely intended to harass.

14 Responding Party objects to this request on the ground that it is not relevant to the subject
15 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
16 evidence.

17 Responding Party objects to this request to the extent it requires it to obtain and produce
18 documents from person over whom it has no control.

19 Responding Party objects to this request on the grounds it is vague, ambiguous, or
20 otherwise lacks sufficient precision to permit a response.

21 Responding Party objects to this request to the extent it calls for the production of
22 documents that it would reveal its trade secrets or other confidential research, development,
23 commercial or proprietary information, or information that may be protected by a right of privacy
24 under either the United States Constitution, Article 1 of the Constitution of the State of California
25 or any other applicable law.

26 Responding Party objects to this request to the extent it seeks production of documents
27 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
28 discovery of admissible evidence.

1 Responding Party objects to this request on the grounds it is overbroad and unduly
2 burdensome.

3 Responding Party objects to this request to the extent it may be construed to request the
4 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
5 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
6 attorneys for Responding Party; that contain privileged attorney-client communications; or that
7 are otherwise protected from production.

8 Responding Party objects to this request to the extent the request is oppressive and/or
9 merely intended to harass.

10 This discovery request, has in substance been previously propounded. Continuous
11 discovery into the same matter constitutes oppression and Responding Party further objects on
12 that ground.

13 Responding Party objects to this request as it assumes facts that have not been established.

14 Responding Party objects to this request to the extent the demand adversely affects third
15 persons whose privacy would be infringed by disclosure of the documents.

16 Responding Party objects to this request on the grounds it violates California state law
17 governing health information privacy including the Confidentiality of Medical Information Act,
18 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

19 **REQUEST NO. 7:**

20 All DOCUMENTS and DATA (including electronic and other COMMUNICATIONS)
21 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for,
22 cash.

23 **RESPONSE TO REQUEST NO. 7:**

24 Responding Party objects to this request on the grounds that information regarding tax
25 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
26 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

27 Responding Party objects to this request to the extent the request is oppressive and/or
28 merely intended to harass.

1 Responding Party objects to this request on the ground that it is not relevant to the subject
2 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Responding Party objects to this request to the extent it requires it to obtain and produce
5 documents from person over whom it has no control.

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7 otherwise lacks sufficient precision to permit a response.

8 Responding Party objects to this request to the extent it calls for the production of
9 documents that it would reveal its trade secrets or other confidential research, development,
10 commercial or proprietary information, or information that may be protected by a right of privacy
11 under either the United States Constitution, Article 1 of the Constitution of the State of California
12 or any other applicable law.

13 Responding Party objects to this request to the extent it seeks production of documents
14 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
15 discovery of admissible evidence.

16 Responding Party objects to this request on the grounds it is overbroad and unduly
17 burdensome.

18 Responding Party objects to this request to the extent it may be construed to request the
19 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
20 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
21 attorneys for Responding Party; that contain privileged attorney-client communications; or that
22 are otherwise protected from production.

23 Responding Party objects to this request to the extent the request is oppressive and/or
24 merely intended to harass.

25 This discovery request, has in substance been previously propounded. Continuous
26 discovery into the same matter constitutes oppression and Responding Party further objects on
27 that ground.

28 Responding Party objects to this request as it assumes facts that have not been established.

1 Responding Party objects to this request to the extent the demand adversely affects third
2 persons whose privacy would be infringed by disclosure of the documents.

3 Responding Party objects to this request on the grounds it violates California state law
4 governing health information privacy including the Confidentiality of Medical Information Act,
5 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

6 **REQUEST NO. 8:**

7 All DOCUMENTS and DATA (including electronic mail and other
8 COMMUNICATIONS) that REFER or RELATE to the cultivation, growth, production,
9 refinement, transfer, carry, transport, distribution, sale, purchase, and/or financing of MEDICAL
10 MARIJUANA.

11 **RESPONSE TO REQUEST NO. 8:**

12 Responding Party objects to this request on the grounds that information regarding tax
13 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
14 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

15 Responding Party objects to this request to the extent the request is oppressive and/or
16 merely intended to harass.

17 Responding Party objects to this request on the ground that it is not relevant to the subject
18 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
19 evidence.

20 Responding Party objects to this request to the extent it requires it to obtain and produce
21 documents from person over whom it has no control.

22 Responding Party objects to this request on the grounds it is vague, ambiguous, or
23 otherwise lacks sufficient precision to permit a response.

24 Responding Party objects to this request to the extent it calls for the production of
25 documents that it would reveal its trade secrets or other confidential research, development,
26 commercial or proprietary information, or information that may be protected by a right of privacy
27 under either the United States Constitution, Article 1 of the Constitution of the State of California
28 or any other applicable law.

1 Responding Party objects to this request to the extent it seeks production of documents
2 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
3 discovery of admissible evidence.

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5 burdensome.

6 Responding Party objects to this request to the extent it may be construed to request the
7 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
8 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
9 attorneys for Responding Party; that contain privileged attorney-client communications; or that
10 are otherwise protected from production.

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12 merely intended to harass.

13 This discovery request, has in substance been previously propounded. Continuous
14 discovery into the same matter constitutes oppression and Responding Party further objects on
15 that ground.

16 Responding Party objects to this request as it assumes facts that have not been established.

17 Responding Party objects to this request to the extent the demand adversely affects third
18 persons whose privacy would be infringed by disclosure of the documents.

19 Responding Party objects to this request on the grounds it violates California state law
20 governing health information privacy including the Confidentiality of Medical Information Act,
21 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

22 **REQUEST NO. 9:**

23 All COMMUNICATIONS with, including, by or between, any defendant in this
24 ACTION.

25 **RESPONSE TO REQUEST NO. 9:**

26 Responding Party objects to this request on the grounds that information regarding tax
27 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
28 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

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4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

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7 documents from person over whom it has no control.

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9 otherwise lacks sufficient precision to permit a response.

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11 documents that it would reveal its trade secrets or other confidential research, development,
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13 under either the United States Constitution, Article 1 of the Constitution of the State of California
14 or any other applicable law.

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16 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
17 discovery of admissible evidence.

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19 burdensome.

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21 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
22 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
23 attorneys for Responding Party; that contain privileged attorney-client communications; or that
24 are otherwise protected from production.

25 Responding Party objects to this request to the extent the request is oppressive and/or
26 merely intended to harass.

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1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

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5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 10:**

11 All COMMUNICATIONS with, including, by or between, any natural or legal person
12 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport,
13 distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

14 **RESPONSE TO REQUEST NO. 10:**

15 Responding Party objects to this request on the grounds that information regarding tax
16 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
17 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

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19 merely intended to harass.

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26 otherwise lacks sufficient precision to permit a response.

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28 documents that it would reveal its trade secrets or other confidential research, development,

1 commercial or proprietary information, or information that may be protected by a right of privacy
2 under either the United States Constitution, Article 1 of the Constitution of the State of California
3 or any other applicable law.

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5 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
6 discovery of admissible evidence.

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8 burdensome.

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12 attorneys for Responding Party; that contain privileged attorney-client communications; or that
13 are otherwise protected from production.

14 Responding Party objects to this request to the extent the request is oppressive and/or
15 merely intended to harass.

16 This discovery request, has in substance been previously propounded. Continuous
17 discovery into the same matter constitutes oppression and Responding Party further objects on
18 that ground.

19 Responding Party objects to this request as it assumes facts that have not been established.

20 Responding Party objects to this request to the extent the demand adversely affects third
21 persons whose privacy would be infringed by disclosure of the documents.

22 Responding Party objects to this request on the grounds it violates California state law
23 governing health information privacy including the Confidentiality of Medical Information Act,
24 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

25 **REQUEST NO. 11:**

26 All DOCUMENTS and DATA (including electronic mail and other
27 COMMUNICATIONS) that REFER or RELATE to YOUR Articles of Incorporation and any
28 amendments thereto, all bylaws and amendments thereto, and all meeting minutes.

1 **RESPONSE TO REQUEST NO. 11:**

2 Responding Party objects to this request on the grounds that information regarding tax
3 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
4 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

5 Responding Party objects to this request to the extent the request is oppressive and/or
6 merely intended to harass.

7 Responding Party objects to this request on the ground that it is not relevant to the subject
8 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Responding Party objects to this request to the extent it requires it to obtain and produce
11 documents from person over whom it has no control.

12 Responding Party objects to this request on the grounds it is vague, ambiguous, or
13 otherwise lacks sufficient precision to permit a response.

14 Responding Party objects to this request to the extent it calls for the production of
15 documents that it would reveal its trade secrets or other confidential research, development,
16 commercial or proprietary information, or information that may be protected by a right of privacy
17 under either the United States Constitution, Article 1 of the Constitution of the State of California
18 or any other applicable law.

19 Responding Party objects to this request to the extent it seeks production of documents
20 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
21 discovery of admissible evidence.

22 Responding Party objects to this request on the grounds it is overbroad and unduly
23 burdensome.

24 Responding Party objects to this request to the extent it may be construed to request the
25 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
26 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
27 attorneys for Responding Party; that contain privileged attorney-client communications; or that
28 are otherwise protected from production.

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Responding Party objects to this request to the extent the request is oppressive and/or merely intended to harass.

This discovery request, has in substance been previously propounded. Continuous discovery into the same matter constitutes oppression and Responding Party further objects on that ground.

Responding Party objects to this request as it assumes facts that have not been established.

Responding Party objects to this request to the extent the demand adversely affects third persons whose privacy would be infringed by disclosure of the documents.

Responding Party objects to this request on the grounds it violates California state law governing health information privacy including the Confidentiality of Medical Information Act, California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

Dated: February 5, 2018



A handwritten signature in black ink, appearing to read "Matthew B. Dart".

By _____
MATTHEW B. DART
Attorneys for Defendants

EXHIBIT M

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6 Attorneys for Defendants Point Loma Patients
7 Consumer Cooperative, Golden State Greens,
Far West Operating, Far West Management, Far
8 West Staffing

9 **SUPERIOR COURT OF CALIFORNIA**
10 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**

12 KARL BECK, individually and on behalf
13 of all similarly situated California
residents,

14 Plaintiff,

15 v.

16 POINT LOMA PATIENTS CONSUMER
17 COOPERATIVE CORPORATION, A
California Corporation, ADAM KNOFF,
18 an Individual, JUSTUS H. HENKES IV, an
Individual, 419 CONSULTING INC., a
19 California Corporation, GOLDEN STATE
GREENS LLC, a California LLC, FAR
20 WEST MANAGEMENT, LLC, a
California LLC, FAR WEST
21 OPERATING, LLC, a California LLC,
FAR WEST STAFFING, LLC, a
22 California LLC, and DOES 1 through 50,
inclusive.

23 Defendants.

CASE NO. 37-2017-00037524-CU-BT-CTL
DEFENDANT GOLDEN STATE GREENS
RESPONSES TO REQUEST FOR
PRODUCTION OF DOCUMENTS (SET
ONE)

25 **PROPOUNDING PARTY:** Plaintiff KARL BECK
26 **RESPONDING PARTY:** Defendant GOLDEN STATE GREENS
27 **SET NUMBER:** One

1 Defendant GOLDEN STATE GREENS (“Defendant” or “Responding Party”) submits the
2 following responses and objections to plaintiff KARL BECK’s (Plaintiff” or "Propounding
3 Party") Requests for Production of Documents, Set One.

4 **Responses To Request for Production of Documents**

5 **REQUEST NO. 1:**

6 All DOCUMENTS and DATA (including electronic mail and other
7 COMMUNICATIONS) that REFER or RELATE to any contracts or agreements, formal or
8 informal, between or among YOU and any defendant in this ACTION.

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

10 Responding Party objects to this request on the grounds that information regarding tax
11 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
12 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

13 Responding Party objects to this request to the extent the request is oppressive and/or
14 merely intended to harass.

15 Responding Party objects to this request on the ground that it is not relevant to the subject
16 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
17 evidence.

18 Responding Party objects to this request to the extent it requires it to obtain and produce
19 documents from person over whom it has no control.

20 Responding Party objects to this request on the grounds it is vague, ambiguous, or
21 otherwise lacks sufficient precision to permit a response.

22 Responding Party objects to this request to the extent it calls for the production of
23 documents that it would reveal its trade secrets or other confidential research, development,
24 commercial or proprietary information, or information that may be protected by a right of privacy
25 under either the United States Constitution, Article 1 of the Constitution of the State of California
26 or any other applicable law.

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1 Responding Party objects to this request to the extent it seeks production of documents
2 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
3 discovery of admissible evidence.

4 Responding Party objects to this request on the grounds it is overbroad and unduly
5 burdensome.

6 Responding Party objects to this request to the extent it may be construed to request the
7 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
8 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
9 attorneys for Responding Party; that contain privileged attorney-client communications; or that
10 are otherwise protected from production.

11 Responding Party objects to this request to the extent the request is oppressive and/or
12 merely intended to harass.

13 This discovery request, has in substance been previously propounded. Continuous
14 discovery into the same matter constitutes oppression and Responding Party further objects on
15 that ground.

16 Responding Party objects to this request as it assumes facts that have not been established.

17 Responding Party objects to this request to the extent the demand adversely affects third
18 persons whose privacy would be infringed by disclosure of the documents.

19 Responding Party objects to this request on the grounds it violates California state law
20 governing health information privacy including the Confidentiality of Medical Information Act,
21 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

22 **REQUEST NO. 2:**

23 All DOCUMENTS and DATA (including electronic mail and other
24 COMMUNICATIONS) that REFER or RELATE to YOUR tax returns.

25 **RESPONSE TO REQUEST NO. 2:**

26 Responding Party objects to this request on the grounds that information regarding tax
27 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
28 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 Responding Party objects to this request on the ground that it is not relevant to the subject
4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request to the extent it requires it to obtain and produce
7 documents from person over whom it has no control.

8 Responding Party objects to this request on the grounds it is vague, ambiguous, or
9 otherwise lacks sufficient precision to permit a response.

10 Responding Party objects to this request to the extent it calls for the production of
11 documents that it would reveal its trade secrets or other confidential research, development,
12 commercial or proprietary information, or information that may be protected by a right of privacy
13 under either the United States Constitution, Article 1 of the Constitution of the State of California
14 or any other applicable law.

15 Responding Party objects to this request to the extent it seeks production of documents
16 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
17 discovery of admissible evidence.

18 Responding Party objects to this request on the grounds it is overbroad and unduly
19 burdensome.

20 Responding Party objects to this request to the extent it may be construed to request the
21 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
22 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
23 attorneys for Responding Party; that contain privileged attorney-client communications; or that
24 are otherwise protected from production.

25 Responding Party objects to this request to the extent the request is oppressive and/or
26 merely intended to harass.

27
28

1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

4 Responding Party objects to this request as it assumes facts that have not been established.

5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 3:**

11 All of YOUR bank statements.

12 **RESPONSE TO REQUEST NO. 3:**

13 Responding Party objects to this request on the grounds that information regarding tax
14 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
15 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

16 Responding Party objects to this request to the extent the request is oppressive and/or
17 merely intended to harass.

18 Responding Party objects to this request on the ground that it is not relevant to the subject
19 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Responding Party objects to this request to the extent it requires it to obtain and produce
22 documents from person over whom it has no control.

23 Responding Party objects to this request on the grounds it is vague, ambiguous, or
24 otherwise lacks sufficient precision to permit a response.

25 Responding Party objects to this request to the extent it calls for the production of
26 documents that it would reveal its trade secrets or other confidential research, development,
27 commercial or proprietary information, or information that may be protected by a right of privacy
28

1 under either the United States Constitution, Article 1 of the Constitution of the State of California
2 or any other applicable law.

3 Responding Party objects to this request to the extent it seeks production of documents
4 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
5 discovery of admissible evidence.

6 Responding Party objects to this request on the grounds it is overbroad and unduly
7 burdensome.

8 Responding Party objects to this request to the extent it may be construed to request the
9 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
10 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
11 attorneys for Responding Party; that contain privileged attorney-client communications; or that
12 are otherwise protected from production.

13 Responding Party objects to this request to the extent the request is oppressive and/or
14 merely intended to harass.

15 This discovery request, has in substance been previously propounded. Continuous
16 discovery into the same matter constitutes oppression and Responding Party further objects on
17 that ground.

18 Responding Party objects to this request as it assumes facts that have not been established.

19 Responding Party objects to this request to the extent the demand adversely affects third
20 persons whose privacy would be infringed by disclosure of the documents.

21 Responding Party objects to this request on the grounds it violates California state law
22 governing health information privacy including the Confidentiality of Medical Information Act,
23 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

24 **REQUEST NO. 4:**

25 All DOCUMENTS and DATA (including electronic mail and other
26 COMMUNICATIONS) that REFER or RELATE to YOUR expenses, including but not limited
27 to rent, utilities, insurance, fees, wages, taxes, interest, supplies, maintenance, travel, meals and
28 entertainment, and training.

1 **RESPONSE TO REQUEST NO. 4:**

2 Responding Party objects to this request on the grounds that information regarding tax
3 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
4 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

5 Responding Party objects to this request to the extent the request is oppressive and/or
6 merely intended to harass.

7 Responding Party objects to this request on the ground that it is not relevant to the subject
8 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Responding Party objects to this request to the extent it requires it to obtain and produce
11 documents from person over whom it has no control.

12 Responding Party objects to this request on the grounds it is vague, ambiguous, or
13 otherwise lacks sufficient precision to permit a response.

14 Responding Party objects to this request to the extent it calls for the production of
15 documents that it would reveal its trade secrets or other confidential research, development,
16 commercial or proprietary information, or information that may be protected by a right of privacy
17 under either the United States Constitution, Article 1 of the Constitution of the State of California
18 or any other applicable law.

19 Responding Party objects to this request to the extent it seeks production of documents
20 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
21 discovery of admissible evidence.

22 Responding Party objects to this request on the grounds it is overbroad and unduly
23 burdensome.

24 Responding Party objects to this request to the extent it may be construed to request the
25 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
26 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
27 attorneys for Responding Party; that contain privileged attorney-client communications; or that
28 are otherwise protected from production.

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 This discovery request, has in substance been previously propounded. Continuous
4 discovery into the same matter constitutes oppression and Responding Party further objects on
5 that ground.

6 Responding Party objects to this request as it assumes facts that have not been established.

7 Responding Party objects to this request to the extent the demand adversely affects third
8 persons whose privacy would be infringed by disclosure of the documents.

9 Responding Party objects to this request on the grounds it violates California state law
10 governing health information privacy including the Confidentiality of Medical Information Act,
11 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

12 **REQUEST NO. 5:**

13 All DOCUMENTS and DATA (including electronic mail and other
14 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
15 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
16 including, by or between YOU and any defendant in this ACTION.

17 **RESPONSE TO REQUEST NO. 5:**

18 Responding Party objects to this request on the grounds that information regarding tax
19 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
20 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

21 Responding Party objects to this request to the extent the request is oppressive and/or
22 merely intended to harass.

23 Responding Party objects to this request on the ground that it is not relevant to the subject
24 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Responding Party objects to this request to the extent it requires it to obtain and produce
27 documents from person over whom it has no control.

28

1 Responding Party objects to this request on the grounds it is vague, ambiguous, or
2 otherwise lacks sufficient precision to permit a response.

3 Responding Party objects to this request to the extent it calls for the production of
4 documents that it would reveal its trade secrets or other confidential research, development,
5 commercial or proprietary information, or information that may be protected by a right of privacy
6 under either the United States Constitution, Article 1 of the Constitution of the State of California
7 or any other applicable law.

8 Responding Party objects to this request to the extent it seeks production of documents
9 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
10 discovery of admissible evidence.

11 Responding Party objects to this request on the grounds it is overbroad and unduly
12 burdensome.

13 Responding Party objects to this request to the extent it may be construed to request the
14 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
15 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
16 attorneys for Responding Party; that contain privileged attorney-client communications; or that
17 are otherwise protected from production.

18 Responding Party objects to this request to the extent the request is oppressive and/or
19 merely intended to harass.

20 This discovery request, has in substance been previously propounded. Continuous
21 discovery into the same matter constitutes oppression and Responding Party further objects on
22 that ground.

23 Responding Party objects to this request as it assumes facts that have not been established.

24 Responding Party objects to this request to the extent the demand adversely affects third
25 persons whose privacy would be infringed by disclosure of the documents.

26 Responding Party objects to this request on the grounds it violates California state law
27 governing health information privacy including the Confidentiality of Medical Information Act,
28 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

1 **REQUEST NO. 6:**

2 All DOCUMENTS and DATA (including electronic mail and other
3 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
4 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
5 including, by or between, YOU and any natural or legal person involved in the cultivation,
6 growth, production, refinement, transfer, carry, transport, distribution, sale, purchase, and/or
7 financing of MEDICAL MARIJUANA.

8 **RESPONSE TO REQUEST NO. 6:**

9 Responding Party objects to this request on the grounds that information regarding tax
10 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
11 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

12 Responding Party objects to this request to the extent the request is oppressive and/or
13 merely intended to harass.

14 Responding Party objects to this request on the ground that it is not relevant to the subject
15 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
16 evidence.

17 Responding Party objects to this request to the extent it requires it to obtain and produce
18 documents from person over whom it has no control.

19 Responding Party objects to this request on the grounds it is vague, ambiguous, or
20 otherwise lacks sufficient precision to permit a response.

21 Responding Party objects to this request to the extent it calls for the production of
22 documents that it would reveal its trade secrets or other confidential research, development,
23 commercial or proprietary information, or information that may be protected by a right of privacy
24 under either the United States Constitution, Article 1 of the Constitution of the State of California
25 or any other applicable law.

26 Responding Party objects to this request to the extent it seeks production of documents
27 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
28 discovery of admissible evidence.

1 Responding Party objects to this request on the grounds it is overbroad and unduly
2 burdensome.

3 Responding Party objects to this request to the extent it may be construed to request the
4 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
5 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
6 attorneys for Responding Party; that contain privileged attorney-client communications; or that
7 are otherwise protected from production.

8 Responding Party objects to this request to the extent the request is oppressive and/or
9 merely intended to harass.

10 Responding Party objects to this request to the extent the request is oppressive and/or
11 merely intended to harass. This discovery request, has in substance been previously propounded. Continuous
12 discovery into the same matter constitutes oppression and Responding Party further objects on
13 that ground.

13 Responding Party objects to this request as it assumes facts that have not been established.

14 Responding Party objects to this request to the extent the demand adversely affects third
15 persons whose privacy would be infringed by disclosure of the documents.

16 Responding Party objects to this request on the grounds it violates California state law
17 governing health information privacy including the Confidentiality of Medical Information Act,
18 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

19 **REQUEST NO. 7:**

20 All DOCUMENTS and DATA (including electronic mail and other
21 COMMUNICATIONS) that REFER or RELATE to YOUR payment in, payment to, handling of,
22 and accounting for, cash.

23 **RESPONSE TO REQUEST NO. 7:**

24 Responding Party objects to this request on the grounds that information regarding tax
25 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
26 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

27 Responding Party objects to this request to the extent the request is oppressive and/or
28 merely intended to harass.

1 Responding Party objects to this request on the ground that it is not relevant to the subject
2 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Responding Party objects to this request to the extent it requires it to obtain and produce
5 documents from person over whom it has no control.

6 Responding Party objects to this request on the grounds it is vague, ambiguous, or
7 otherwise lacks sufficient precision to permit a response.

8 Responding Party objects to this request to the extent it calls for the production of
9 documents that it would reveal its trade secrets or other confidential research, development,
10 commercial or proprietary information, or information that may be protected by a right of privacy
11 under either the United States Constitution, Article 1 of the Constitution of the State of California
12 or any other applicable law.

13 Responding Party objects to this request to the extent it seeks production of documents
14 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
15 discovery of admissible evidence.

16 Responding Party objects to this request on the grounds it is overbroad and unduly
17 burdensome.

18 Responding Party objects to this request to the extent it may be construed to request the
19 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
20 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
21 attorneys for Responding Party; that contain privileged attorney-client communications; or that
22 are otherwise protected from production.

23 Responding Party objects to this request to the extent the request is oppressive and/or
24 merely intended to harass.

25 This discovery request, has in substance been previously propounded. Continuous
26 discovery into the same matter constitutes oppression and Responding Party further objects on
27 that ground.

28 Responding Party objects to this request as it assumes facts that have not been established.

1 Responding Party objects to this request to the extent the demand adversely affects third
2 persons whose privacy would be infringed by disclosure of the documents.

3 Responding Party objects to this request on the grounds it violates California state law
4 governing health information privacy including the Confidentiality of Medical Information Act,
5 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

6 **REQUEST NO. 8:**

7 All DOCUMENTS and DATA (including electronic mail and other
8 COMMUNICATIONS) that REFER or RELATE to the cultivation, growth, production,
9 refinement, transfer, carry, transport, distribution, sale, purchase, and/or financing of MEDICAL
10 MARIJUANA.

11 **RESPONSE TO REQUEST NO. 8:**

12 Responding Party objects to this request on the grounds that information regarding tax
13 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
14 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

15 Responding Party objects to this request to the extent the request is oppressive and/or
16 merely intended to harass.

17 Responding Party objects to this request on the ground that it is not relevant to the subject
18 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
19 evidence.

20 Responding Party objects to this request to the extent it requires it to obtain and produce
21 documents from person over whom it has no control.

22 Responding Party objects to this request on the grounds it is vague, ambiguous, or
23 otherwise lacks sufficient precision to permit a response.

24 Responding Party objects to this request to the extent it calls for the production of
25 documents that it would reveal its trade secrets or other confidential research, development,
26 commercial or proprietary information, or information that may be protected by a right of privacy
27 under either the United States Constitution, Article 1 of the Constitution of the State of California
28 or any other applicable law.

1 Responding Party objects to this request to the extent it seeks production of documents
2 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
3 discovery of admissible evidence.

4 Responding Party objects to this request on the grounds it is overbroad and unduly
5 burdensome.

6 Responding Party objects to this request to the extent it may be construed to request the
7 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
8 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
9 attorneys for Responding Party; that contain privileged attorney-client communications; or that
10 are otherwise protected from production.

11 Responding Party objects to this request to the extent the request is oppressive and/or
12 merely intended to harass.

13 This discovery request, has in substance been previously propounded. Continuous
14 discovery into the same matter constitutes oppression and Responding Party further objects on
15 that ground.

16 Responding Party objects to this request as it assumes facts that have not been established.

17 Responding Party objects to this request to the extent the demand adversely affects third
18 persons whose privacy would be infringed by disclosure of the documents.

19 Responding Party objects to this request on the grounds it violates California state law
20 governing health information privacy including the Confidentiality of Medical Information Act,
21 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

22 **REQUEST NO. 9:**

23 All COMMUNICATIONS with, including, by or between, any defendant in this
24 ACTION.

25 **RESPONSE TO REQUEST NO. 9:**

26 Responding Party objects to this request on the grounds that information regarding tax
27 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
28 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 Responding Party objects to this request on the ground that it is not relevant to the subject
4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request to the extent it requires it to obtain and produce
7 documents from person over whom it has no control.

8 Responding Party objects to this request on the grounds it is vague, ambiguous, or
9 otherwise lacks sufficient precision to permit a response.

10 Responding Party objects to this request to the extent it calls for the production of
11 documents that it would reveal its trade secrets or other confidential research, development,
12 commercial or proprietary information, or information that may be protected by a right of privacy
13 under either the United States Constitution, Article 1 of the Constitution of the State of California
14 or any other applicable law.

15 Responding Party objects to this request to the extent it seeks production of documents
16 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
17 discovery of admissible evidence.

18 Responding Party objects to this request on the grounds it is overbroad and unduly
19 burdensome.

20 Responding Party objects to this request to the extent it may be construed to request the
21 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
22 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
23 attorneys for Responding Party; that contain privileged attorney-client communications; or that
24 are otherwise protected from production.

25 Responding Party objects to this request to the extent the request is oppressive and/or
26 merely intended to harass.

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1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

4 Responding Party objects to this request as it assumes facts that have not been established.

5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 10:**

11 All COMMUNICATIONS with, including, by or between, any natural or legal person
12 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport,
13 distribution, sale, purchase, and/or financing MEDICAL MARIJUANA.

14 **RESPONSE TO REQUEST NO. 10:**

15 Responding Party objects to this request on the grounds that information regarding tax
16 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
17 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

18 Responding Party objects to this request to the extent the request is oppressive and/or
19 merely intended to harass.

20 Responding Party objects to this request on the ground that it is not relevant to the subject
21 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Responding Party objects to this request to the extent it requires it to obtain and produce
24 documents from person over whom it has no control.

25 Responding Party objects to this request on the grounds it is vague, ambiguous, or
26 otherwise lacks sufficient precision to permit a response.

27 Responding Party objects to this request to the extent it calls for the production of
28 documents that it would reveal its trade secrets or other confidential research, development,

1 commercial or proprietary information, or information that may be protected by a right of privacy
2 under either the United States Constitution, Article 1 of the Constitution of the State of California
3 or any other applicable law.

4 Responding Party objects to this request to the extent it seeks production of documents
5 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
6 discovery of admissible evidence.

7 Responding Party objects to this request on the grounds it is overbroad and unduly
8 burdensome.

9 Responding Party objects to this request to the extent it may be construed to request the
10 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
11 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
12 attorneys for Responding Party; that contain privileged attorney-client communications; or that
13 are otherwise protected from production.

14 Responding Party objects to this request to the extent the request is oppressive and/or
15 merely intended to harass.

16 This discovery request, has in substance been previously propounded. Continuous
17 discovery into the same matter constitutes oppression and Responding Party further objects on
18 that ground.

19 Responding Party objects to this request as it assumes facts that have not been established.

20 Responding Party objects to this request to the extent the demand adversely affects third
21 persons whose privacy would be infringed by disclosure of the documents.

22 Responding Party objects to this request on the grounds it violates California state law
23 governing health information privacy including the Confidentiality of Medical Information Act,
24 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

25 **REQUEST NO. 11:**

26 All DOCUMENTS and DATA (including electronic mail and other
27 COMMUNICATIONS) that REFER or RELATE to YOUR Articles of Incorporation and any
28 amendments thereto, all bylaws and amendments thereto, and all meeting minutes.

1 **RESPONSE TO REQUEST NO. 11:**

2 Responding Party objects to this request on the grounds that information regarding tax
3 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
4 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

5 Responding Party objects to this request to the extent the request is oppressive and/or
6 merely intended to harass.

7 Responding Party objects to this request on the ground that it is not relevant to the subject
8 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Responding Party objects to this request to the extent it requires it to obtain and produce
11 documents from person over whom it has no control.

12 Responding Party objects to this request on the grounds it is vague, ambiguous, or
13 otherwise lacks sufficient precision to permit a response.

14 Responding Party objects to this request to the extent it calls for the production of
15 documents that it would reveal its trade secrets or other confidential research, development,
16 commercial or proprietary information, or information that may be protected by a right of privacy
17 under either the United States Constitution, Article 1 of the Constitution of the State of California
18 or any other applicable law.

19 Responding Party objects to this request to the extent it seeks production of documents
20 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
21 discovery of admissible evidence.

22 Responding Party objects to this request on the grounds it is overbroad and unduly
23 burdensome.

24 Responding Party objects to this request to the extent it may be construed to request the
25 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
26 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
27 attorneys for Responding Party; that contain privileged attorney-client communications; or that
28 are otherwise protected from production.

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Responding Party objects to this request to the extent the request is oppressive and/or merely intended to harass.

This discovery request, has in substance been previously propounded. Continuous discovery into the same matter constitutes oppression and Responding Party further objects on that ground.

Responding Party objects to this request as it assumes facts that have not been established.

Responding Party objects to this request to the extent the demand adversely affects third persons whose privacy would be infringed by disclosure of the documents.

Responding Party objects to this request on the grounds it violates California state law governing health information privacy including the Confidentiality of Medical Information Act, California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

DATED: February 5, 2018

AUSTIN LEGAL GROUP, APC

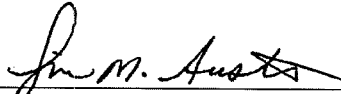
By: 
Gina Austin/Tamara Leetham
Attorneys for Golden State Greens, LLC

EXHIBIT N

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6 Attorneys for Defendants Point Loma Patients
7 Consumer Cooperative, Golden State Greens,
Far West Operating, Far West Management, Far
8 West Staffing

9 **SUPERIOR COURT OF CALIFORNIA**
10 **COUNTY OF SAN DIEGO, CENTRAL DIVISION**

12 KARL BECK, individually and on behalf
13 of all similarly situated California
residents,

14 Plaintiff,

15 v.

16 POINT LOMA PATIENTS CONSUMER
17 COOPERATIVE CORPORATION, A
California Corporation, ADAM KNOPF,
an Individual, JUSTUS H. HENKES IV, an
18 Individual, 419 CONSULTING INC., a
California Corporation, GOLDEN STATE
19 GREENS LLC, a California LLC, FAR
WEST MANAGEMENT, LLC, a
20 California LLC, FAR WEST
OPERATING, LLC, a California LLC,
21 FAR WEST STAFFING, LLC, a
California LLC, and DOES 1 through 50,
22 inclusive.

23 Defendants.

CASE NO. 37-2017-00037524-CU-BT-CTL

DEFENDANT FAR WEST
MANAGEMENT'S RESPONSES TO
REQUEST FOR PRODUCTION OF
DOCUMENTS (SET
ONE)

25 **PROPOUNDING PARTY:** Plaintiff KARL BECK

26 **RESPONDING PARTY:** Defendant FAR WEST MANAGEMENT

27 **SET NUMBER:** One

28

1 Defendant FAR WEST MANAGEMENT ("Defendant" or "Responding Party") submits
2 the following responses and objections to plaintiff KARL BECK's (Plaintiff" or "Propounding
3 Party") Requests for Production of Documents, Set One.

4 **Responses To Request for Production of Documents**

5 **REQUEST NO. 1:**

6 All DOCUMENTS and DATA (including electronic mail and other
7 COMMUNICATIONS) that REFER or RELATE to any contracts or agreements, formal or
8 informal, between or among YOU and any defendant in this ACTION.

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

10 Responding Party objects to this request on the grounds that information regarding tax
11 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
12 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

13 Responding Party objects to this request to the extent the request is oppressive and/or
14 merely intended to harass.

15 Responding Party objects to this request on the ground that it is not relevant to the subject
16 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
17 evidence.

18 Responding Party objects to this request to the extent it requires it to obtain and produce
19 documents from person over whom it has no control.

20 Responding Party objects to this request on the grounds it is vague, ambiguous, or
21 otherwise lacks sufficient precision to permit a response.

22 Responding Party objects to this request to the extent it calls for the production of
23 documents that it would reveal its trade secrets or other confidential research, development,
24 commercial or proprietary information, or information that may be protected by a right of privacy
25 under either the United States Constitution, Article 1 of the Constitution of the State of California
26 or any other applicable law.

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1 Responding Party objects to this request to the extent it seeks production of documents
2 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
3 discovery of admissible evidence.

4 Responding Party objects to this request on the grounds it is overbroad and unduly
5 burdensome.

6 Responding Party objects to this request to the extent it may be construed to request the
7 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
8 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
9 attorneys for Responding Party; that contain privileged attorney-client communications; or that
10 are otherwise protected from production.

11 Responding Party objects to this request to the extent the request is oppressive and/or
12 merely intended to harass.

13 This discovery request, has in substance been previously propounded. Continuous
14 discovery into the same matter constitutes oppression and Responding Party further objects on
15 that ground.

16 Responding Party objects to this request as it assumes facts that have not been established.

17 Responding Party objects to this request to the extent the demand adversely affects third
18 persons whose privacy would be infringed by disclosure of the documents.

19 Responding Party objects to this request on the grounds it violates California state law
20 governing health information privacy including the Confidentiality of Medical Information Act,
21 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

22 **REQUEST NO. 2:**

23 All DOCUMENTS and DATA (including electronic mail and other
24 COMMUNICATIONS) that REFER or RELATE to YOUR tax returns.

25 **RESPONSE TO REQUEST NO. 2:**

26 Responding Party objects to this request on the grounds that information regarding tax
27 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
28 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 Responding Party objects to this request on the ground that it is not relevant to the subject
4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request to the extent it requires it to obtain and produce
7 documents from person over whom it has no control.

8 Responding Party objects to this request on the grounds it is vague, ambiguous, or
9 otherwise lacks sufficient precision to permit a response.

10 Responding Party objects to this request to the extent it calls for the production of
11 documents that it would reveal its trade secrets or other confidential research, development,
12 commercial or proprietary information, or information that may be protected by a right of privacy
13 under either the United States Constitution, Article 1 of the Constitution of the State of California
14 or any other applicable law.

15 Responding Party objects to this request to the extent it seeks production of documents
16 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
17 discovery of admissible evidence.

18 Responding Party objects to this request on the grounds it is overbroad and unduly
19 burdensome.

20 Responding Party objects to this request to the extent it may be construed to request the
21 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
22 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
23 attorneys for Responding Party; that contain privileged attorney-client communications; or that
24 are otherwise protected from production.

25 Responding Party objects to this request to the extent the request is oppressive and/or
26 merely intended to harass.

27
28

1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

4 Responding Party objects to this request as it assumes facts that have not been established.

5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 3:**

11 All of YOUR bank statements.

12 **RESPONSE TO REQUEST NO. 3:**

13 Responding Party objects to this request on the grounds that information regarding tax
14 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
15 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

16 Responding Party objects to this request to the extent the request is oppressive and/or
17 merely intended to harass.

18 Responding Party objects to this request on the ground that it is not relevant to the subject
19 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Responding Party objects to this request to the extent it requires it to obtain and produce
22 documents from person over whom it has no control.

23 Responding Party objects to this request on the grounds it is vague, ambiguous, or
24 otherwise lacks sufficient precision to permit a response.

25 Responding Party objects to this request to the extent it calls for the production of
26 documents that it would reveal its trade secrets or other confidential research, development,
27 commercial or proprietary information, or information that may be protected by a right of privacy
28

1 under either the United States Constitution, Article 1 of the Constitution of the State of California
2 or any other applicable law.

3 Responding Party objects to this request to the extent it seeks production of documents
4 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
5 discovery of admissible evidence.

6 Responding Party objects to this request on the grounds it is overbroad and unduly
7 burdensome.

8 Responding Party objects to this request to the extent it may be construed to request the
9 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
10 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
11 attorneys for Responding Party; that contain privileged attorney-client communications; or that
12 are otherwise protected from production.

13 Responding Party objects to this request to the extent the request is oppressive and/or
14 merely intended to harass.

15 This discovery request, has in substance been previously propounded. Continuous
16 discovery into the same matter constitutes oppression and Responding Party further objects on
17 that ground.

18 Responding Party objects to this request as it assumes facts that have not been established.

19 Responding Party objects to this request to the extent the demand adversely affects third
20 persons whose privacy would be infringed by disclosure of the documents.

21 Responding Party objects to this request on the grounds it violates California state law
22 governing health information privacy including the Confidentiality of Medical Information Act,
23 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

24 **REQUEST NO. 4:**

25 All DOCUMENTS and DATA (including electronic mail and other
26 COMMUNICATIONS) that REFER or RELATE to YOUR expenses, including but not limited
27 to rent, utilities, insurance, fees, wages, taxes, interest, supplies, maintenance, travel, meal and
28 entertainment, and training.

1 **RESPONSE TO REQUEST NO. 4:**

2 Responding Party objects to this request on the grounds that information regarding tax
3 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
4 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

5 Responding Party objects to this request to the extent the request is oppressive and/or
6 merely intended to harass.

7 Responding Party objects to this request on the ground that it is not relevant to the subject
8 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Responding Party objects to this request to the extent it requires it to obtain and produce
11 documents from person over whom it has no control.

12 Responding Party objects to this request on the grounds it is vague, ambiguous, or
13 otherwise lacks sufficient precision to permit a response.

14 Responding Party objects to this request to the extent it calls for the production of
15 documents that it would reveal its trade secrets or other confidential research, development,
16 commercial or proprietary information, or information that may be protected by a right of privacy
17 under either the United States Constitution, Article 1 of the Constitution of the State of California
18 or any other applicable law.

19 Responding Party objects to this request to the extent it seeks production of documents
20 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
21 discovery of admissible evidence.

22 Responding Party objects to this request on the grounds it is overbroad and unduly
23 burdensome.

24 Responding Party objects to this request to the extent it may be construed to request the
25 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
26 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
27 attorneys for Responding Party; that contain privileged attorney-client communications; or that
28 are otherwise protected from production.

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 This discovery request, has in substance been previously propounded. Continuous
4 discovery into the same matter constitutes oppression and Responding Party further objects on
5 that ground.

6 Responding Party objects to this request as it assumes facts that have not been established.

7 Responding Party objects to this request to the extent the demand adversely affects third
8 persons whose privacy would be infringed by disclosure of the documents.

9 Responding Party objects to this request on the grounds it violates California state law
10 governing health information privacy including the Confidentiality of Medical Information Act,
11 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

12 **REQUEST NO. 5:**

13 All DOCUMENTS and DATA (including electronic mail and other
14 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
15 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
16 including, by or between, YOU and any defendant in this ACTION.

17 **RESPONSE TO REQUEST NO. 5:**

18 Responding Party objects to this request on the grounds that information regarding tax
19 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
20 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

21 Responding Party objects to this request to the extent the request is oppressive and/or
22 merely intended to harass.

23 Responding Party objects to this request on the ground that it is not relevant to the subject
24 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Responding Party objects to this request to the extent it requires it to obtain and produce
27 documents from person over whom it has no control.

28

1 Responding Party objects to this request on the grounds it is vague, ambiguous, or
2 otherwise lacks sufficient precision to permit a response.

3 Responding Party objects to this request to the extent it calls for the production of
4 documents that it would reveal its trade secrets or other confidential research, development,
5 commercial or proprietary information, or information that may be protected by a right of privacy
6 under either the United States Constitution, Article 1 of the Constitution of the State of California
7 or any other applicable law.

8 Responding Party objects to this request to the extent it seeks production of documents
9 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
10 discovery of admissible evidence.

11 Responding Party objects to this request on the grounds it is overbroad and unduly
12 burdensome.

13 Responding Party objects to this request to the extent it may be construed to request the
14 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
15 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
16 attorneys for Responding Party; that contain privileged attorney-client communications; or that
17 are otherwise protected from production.

18 Responding Party objects to this request to the extent the request is oppressive and/or
19 merely intended to harass.

20 This discovery request, has in substance been previously propounded. Continuous
21 discovery into the same matter constitutes oppression and Responding Party further objects on
22 that ground.

23 Responding Party objects to this request as it assumes facts that have not been established.

24 Responding Party objects to this request to the extent the demand adversely affects third
25 persons whose privacy would be infringed by disclosure of the documents.

26 Responding Party objects to this request on the grounds it violates California state law
27 governing health information privacy including the Confidentiality of Medical Information Act,
28 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

1 **REQUEST NO. 6:**

2 All DOCUMENTS and DATA (including electronic mail and other
3 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
4 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
5 including, by or between, YOU and any natural or legal person involved in the cultivation,
6 growth, production, refinement, transfer, carry, transport, distribution, sale, purchase, and/or
7 financing of MEDICAL MARIJUANA.

8 **RESPONSE TO REQUEST NO. 6:**

9 Responding Party objects to this request on the grounds that information regarding tax
10 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
11 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

12 Responding Party objects to this request to the extent the request is oppressive and/or
13 merely intended to harass.

14 Responding Party objects to this request on the ground that it is not relevant to the subject
15 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
16 evidence.

17 Responding Party objects to this request to the extent it requires it to obtain and produce
18 documents from person over whom it has no control.

19 Responding Party objects to this request on the grounds it is vague, ambiguous, or
20 otherwise lacks sufficient precision to permit a response.

21 Responding Party objects to this request to the extent it calls for the production of
22 documents that it would reveal its trade secrets or other confidential research, development,
23 commercial or proprietary information, or information that may be protected by a right of privacy
24 under either the United States Constitution, Article 1 of the Constitution of the State of California
25 or any other applicable law.

26 Responding Party objects to this request to the extent it seeks production of documents
27 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
28 discovery of admissible evidence.

1 Responding Party objects to this request on the grounds it is overbroad and unduly
2 burdensome.

3 Responding Party objects to this request to the extent it may be construed to request the
4 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
5 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
6 attorneys for Responding Party; that contain privileged attorney-client communications; or that
7 are otherwise protected from production.

8 Responding Party objects to this request to the extent the request is oppressive and/or
9 merely intended to harass.

10 This discovery request, has in substance been previously propounded. Continuous
11 discovery into the same matter constitutes oppression and Responding Party further objects on
12 that ground.

13 Responding Party objects to this request as it assumes facts that have not been established.

14 Responding Party objects to this request to the extent the demand adversely affects third
15 persons whose privacy would be infringed by disclosure of the documents.

16 Responding Party objects to this request on the grounds it violates California state law
17 governing health information privacy including the Confidentiality of Medical Information Act,
18 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

19 **REQUEST NO. 7:**

20 All DOCUMENTS and DATA (including electronic and other COMMUNICATIONS)
21 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for,
22 cash.

23 **RESPONSE TO REQUEST NO. 7:**

24 Responding Party objects to this request on the grounds that information regarding tax
25 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
26 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

27 Responding Party objects to this request to the extent the request is oppressive and/or
28 merely intended to harass.

1 Responding Party objects to this request on the ground that it is not relevant to the subject
2 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Responding Party objects to this request to the extent it requires it to obtain and produce
5 documents from person over whom it has no control.

6 Responding Party objects to this request on the grounds it is vague, ambiguous, or
7 otherwise lacks sufficient precision to permit a response.

8 Responding Party objects to this request to the extent it calls for the production of
9 documents that it would reveal its trade secrets or other confidential research, development,
10 commercial or proprietary information, or information that may be protected by a right of privacy
11 under either the United States Constitution, Article 1 of the Constitution of the State of California
12 or any other applicable law.

13 Responding Party objects to this request to the extent it seeks production of documents
14 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
15 discovery of admissible evidence.

16 Responding Party objects to this request on the grounds it is overbroad and unduly
17 burdensome.

18 Responding Party objects to this request to the extent it may be construed to request the
19 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
20 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
21 attorneys for Responding Party; that contain privileged attorney-client communications; or that
22 are otherwise protected from production.

23 Responding Party objects to this request to the extent the request is oppressive and/or
24 merely intended to harass.

25 This discovery request, has in substance been previously propounded. Continuous
26 discovery into the same matter constitutes oppression and Responding Party further objects on
27 that ground.

28 Responding Party objects to this request as it assumes facts that have not been established.

1 Responding Party objects to this request to the extent the demand adversely affects third
2 persons whose privacy would be infringed by disclosure of the documents.

3 Responding Party objects to this request on the grounds it violates California state law
4 governing health information privacy including the Confidentiality of Medical Information Act,
5 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

6 **REQUEST NO. 8:**

7 All DOCUMENTS and DATA (including electronic mail and other
8 COMMUNICATIONS) that REFER or RELATE to the cultivation, growth, production,
9 refinement, transfer, carry, transport, distribution, sale, purchase, and/or financing of MEDICAL
10 MARIJUANA.

11 **RESPONSE TO REQUEST NO. 8:**

12 Responding Party objects to this request on the grounds that information regarding tax
13 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
14 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

15 Responding Party objects to this request to the extent the request is oppressive and/or
16 merely intended to harass.

17 Responding Party objects to this request on the ground that it is not relevant to the subject
18 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
19 evidence.

20 Responding Party objects to this request to the extent it requires it to obtain and produce
21 documents from person over whom it has no control.

22 Responding Party objects to this request on the grounds it is vague, ambiguous, or
23 otherwise lacks sufficient precision to permit a response.

24 Responding Party objects to this request to the extent it calls for the production of
25 documents that it would reveal its trade secrets or other confidential research, development,
26 commercial or proprietary information, or information that may be protected by a right of privacy
27 under either the United States Constitution, Article 1 of the Constitution of the State of California
28 or any other applicable law.

1 Responding Party objects to this request to the extent it seeks production of documents
2 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
3 discovery of admissible evidence.

4 Responding Party objects to this request on the grounds it is overbroad and unduly
5 burdensome.

6 Responding Party objects to this request to the extent it may be construed to request the
7 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
8 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
9 attorneys for Responding Party; that contain privileged attorney-client communications; or that
10 are otherwise protected from production.

11 Responding Party objects to this request to the extent the request is oppressive and/or
12 merely intended to harass.

13 This discovery request, has in substance been previously propounded. Continuous
14 discovery into the same matter constitutes oppression and Responding Party further objects on
15 that ground.

16 Responding Party objects to this request as it assumes facts that have not been established.

17 Responding Party objects to this request to the extent the demand adversely affects third
18 persons whose privacy would be infringed by disclosure of the documents.

19 Responding Party objects to this request on the grounds it violates California state law
20 governing health information privacy including the Confidentiality of Medical Information Act,
21 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

22 **REQUEST NO. 9:**

23 All COMMUNICATIONS with, including, by or between, any defendant in this
24 ACTION.

25 **RESPONSE TO REQUEST NO. 9:**

26 Responding Party objects to this request on the grounds that information regarding tax
27 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
28 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 Responding Party objects to this request on the ground that it is not relevant to the subject
4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request to the extent it requires it to obtain and produce
7 documents from person over whom it has no control.

8 Responding Party objects to this request on the grounds it is vague, ambiguous, or
9 otherwise lacks sufficient precision to permit a response.

10 Responding Party objects to this request to the extent it calls for the production of
11 documents that it would reveal its trade secrets or other confidential research, development,
12 commercial or proprietary information, or information that may be protected by a right of privacy
13 under either the United States Constitution, Article 1 of the Constitution of the State of California
14 or any other applicable law.

15 Responding Party objects to this request to the extent it seeks production of documents
16 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
17 discovery of admissible evidence.

18 Responding Party objects to this request on the grounds it is overbroad and unduly
19 burdensome.

20 Responding Party objects to this request to the extent it may be construed to request the
21 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
22 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
23 attorneys for Responding Party; that contain privileged attorney-client communications; or that
24 are otherwise protected from production.

25 Responding Party objects to this request to the extent the request is oppressive and/or
26 merely intended to harass.

27
28

1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

4 Responding Party objects to this request as it assumes facts that have not been established.

5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 10:**

11 All COMMUNICATIONS with, including, by or between, any natural or legal person
12 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport,
13 distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

14 **RESPONSE TO REQUEST NO. 10:**

15 Responding Party objects to this request on the grounds that information regarding tax
16 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
17 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

18 Responding Party objects to this request to the extent the request is oppressive and/or
19 merely intended to harass.

20 Responding Party objects to this request on the ground that it is not relevant to the subject
21 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Responding Party objects to this request to the extent it requires it to obtain and produce
24 documents from person over whom it has no control.

25 Responding Party objects to this request on the grounds it is vague, ambiguous, or
26 otherwise lacks sufficient precision to permit a response.

27 Responding Party objects to this request to the extent it calls for the production of
28 documents that it would reveal its trade secrets or other confidential research, development,

1 commercial or proprietary information, or information that may be protected by a right of privacy
2 under either the United States Constitution, Article 1 of the Constitution of the State of California
3 or any other applicable law.

4 Responding Party objects to this request to the extent it seeks production of documents
5 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
6 discovery of admissible evidence.

7 Responding Party objects to this request on the grounds it is overbroad and unduly
8 burdensome.

9 Responding Party objects to this request to the extent it may be construed to request the
10 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
11 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
12 attorneys for Responding Party; that contain privileged attorney-client communications; or that
13 are otherwise protected from production.

14 Responding Party objects to this request to the extent the request is oppressive and/or
15 merely intended to harass.

16 This discovery request, has in substance been previously propounded. Continuous
17 discovery into the same matter constitutes oppression and Responding Party further objects on
18 that ground.

19 Responding Party objects to this request as it assumes facts that have not been established.

20 Responding Party objects to this request to the extent the demand adversely affects third
21 persons whose privacy would be infringed by disclosure of the documents.

22 Responding Party objects to this request on the grounds it violates California state law
23 governing health information privacy including the Confidentiality of Medical Information Act,
24 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

25 **REQUEST NO. 11:**

26 All DOCUMENTS and DATA (including electronic mail and other
27 COMMUNICATIONS) that REFER or RELATE to YOUR Articles of Incorporation and any
28 amendments thereto, all bylaws and amendments thereto, and all meeting minutes.

1 **RESPONSE TO REQUEST NO. 11:**

2 Responding Party objects to this request on the grounds that information regarding tax
3 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
4 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

5 Responding Party objects to this request to the extent the request is oppressive and/or
6 merely intended to harass.

7 Responding Party objects to this request on the ground that it is not relevant to the subject
8 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Responding Party objects to this request to the extent it requires it to obtain and produce
11 documents from person over whom it has no control.

12 Responding Party objects to this request on the grounds it is vague, ambiguous, or
13 otherwise lacks sufficient precision to permit a response.

14 Responding Party objects to this request to the extent it calls for the production of
15 documents that it would reveal its trade secrets or other confidential research, development,
16 commercial or proprietary information, or information that may be protected by a right of privacy
17 under either the United States Constitution, Article 1 of the Constitution of the State of California
18 or any other applicable law.

19 Responding Party objects to this request to the extent it seeks production of documents
20 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
21 discovery of admissible evidence.

22 Responding Party objects to this request on the grounds it is overbroad and unduly
23 burdensome.

24 Responding Party objects to this request to the extent it may be construed to request the
25 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
26 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
27 attorneys for Responding Party; that contain privileged attorney-client communications; or that
28 are otherwise protected from production.

AUSTIN LEGAL GROUP, APC
3990 Old Town Ave, Ste A-112
San Diego, CA 92110

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 This discovery request, has in substance been previously propounded. Continuous
4 discovery into the same matter constitutes oppression and Responding Party further objects on
5 that ground.

6 Responding Party objects to this request as it assumes facts that have not been established.

7 Responding Party objects to this request to the extent the demand adversely affects third
8 persons whose privacy would be infringed by disclosure of the documents.

9 Responding Party objects to this request on the grounds it violates California state law
10 governing health information privacy including the Confidentiality of Medical Information Act,
11 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

12
13 DATED: February 5, 2018

AUSTIN LEGAL GROUP, APC

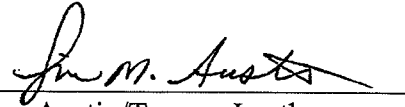
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15 By: 
16 Gina Austin/Tamara Leetham
17 Attorneys for Far West Management, LLC
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19
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EXHIBIT O

AUSTIN LEGAL GROUP, APC
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6 Attorneys for Defendants Point Loma Patients
7 Consumer Cooperative, Golden State Greens,
Far West Operating, Far West Management, Far
8 West Staffing

9
10 **SUPERIOR COURT OF CALIFORNIA**
COUNTY OF SAN DIEGO, CENTRAL DIVISION

11
12 KARL BECK, individually and on behalf
13 of all similarly situated California
residents,

14 Plaintiff,

15 v.

16 POINT LOMA PATIENTS CONSUMER
17 COOPERATIVE CORPORATION, A
California Corporation, ADAM KNOPF,
18 an Individual, JUSTUS H. HENKES IV, an
Individual, 419 CONSULTING INC., a
19 California Corporation, GOLDEN STATE
GREENS LLC, a California LLC, FAR
20 WEST MANAGEMENT, LLC, a
California LLC, FAR WEST
21 OPERATING, LLC, a California LLC,
FAR WEST STAFFING, LLC, a
22 California LLC, and DOES 1 through 50,
inclusive.

23 Defendants.
24

CASE NO. 37-2017-00037524-CU-BT-CTL

**DEFENDANT FAR WEST
OPERATING'S RESPONSES TO
REQUEST FOR PRODUCTION OF
DOCUMENTS (SET
ONE)**

25 **PROPOUNDING PARTY:** Plaintiff KARL BECK

26 **RESPONDING PARTY:** Defendant FAR WEST OPERATING

27 **SET NUMBER:** One
28

1 Defendant FAR WEST MANAGEMENT ("Defendant" or "Responding Party") submits
2 the following responses and objections to plaintiff KARL BECK's (Plaintiff" or "Propounding
3 Party") Requests for Production of Documents, Set One.

4 **Responses To Request for Production of Documents**

5 **REQUEST NO. 1:**

6 All DOCUMENTS and DATA (including electronic mail and other
7 COMMUNICATIONS) that REFER or RELATE to any contracts or agreements, formal or
8 informal, between or among YOU and any defendant in this ACTION.

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

10 Responding Party objects to this request on the grounds that information regarding tax
11 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
12 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

13 Responding Party objects to this request to the extent the request is oppressive and/or
14 merely intended to harass.

15 Responding Party objects to this request on the ground that it is not relevant to the subject
16 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
17 evidence.

18 Responding Party objects to this request to the extent it requires it to obtain and produce
19 documents from person over whom it has no control.

20 Responding Party objects to this request on the grounds it is vague, ambiguous, or
21 otherwise lacks sufficient precision to permit a response.

22 Responding Party objects to this request to the extent it calls for the production of
23 documents that it would reveal its trade secrets or other confidential research, development,
24 commercial or proprietary information, or information that may be protected by a right of privacy
25 under either the United States Constitution, Article 1 of the Constitution of the State of California
26 or any other applicable law.

27
28

1 Responding Party objects to this request to the extent it seeks production of documents
2 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
3 discovery of admissible evidence.

4 Responding Party objects to this request on the grounds it is overbroad and unduly
5 burdensome.

6 Responding Party objects to this request to the extent it may be construed to request the
7 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
8 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
9 attorneys for Responding Party; that contain privileged attorney-client communications; or that
10 are otherwise protected from production.

11 Responding Party objects to this request to the extent the request is oppressive and/or
12 merely intended to harass.

13 This discovery request, has in substance been previously propounded. Continuous
14 discovery into the same matter constitutes oppression and Responding Party further objects on
15 that ground.

16 Responding Party objects to this request as it assumes facts that have not been established.

17 Responding Party objects to this request to the extent the demand adversely affects third
18 persons whose privacy would be infringed by disclosure of the documents.

19 Responding Party objects to this request on the grounds it violates California state law
20 governing health information privacy including the Confidentiality of Medical Information Act,
21 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

22 **REQUEST NO. 2:**

23 All DOCUMENTS and DATA (including electronic mail and other
24 COMMUNICATIONS) that REFER or RELATE to YOUR tax returns.

25 **RESPONSE TO REQUEST NO. 2:**

26 Responding Party objects to this request on the grounds that information regarding tax
27 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
28 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 Responding Party objects to this request on the ground that it is not relevant to the subject
4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request to the extent it requires it to obtain and produce
7 documents from person over whom it has no control.

8 Responding Party objects to this request on the grounds it is vague, ambiguous, or
9 otherwise lacks sufficient precision to permit a response.

10 Responding Party objects to this request to the extent it calls for the production of
11 documents that it would reveal its trade secrets or other confidential research, development,
12 commercial or proprietary information, or information that may be protected by a right of privacy
13 under either the United States Constitution, Article 1 of the Constitution of the State of California
14 or any other applicable law.

15 Responding Party objects to this request to the extent it seeks production of documents
16 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
17 discovery of admissible evidence.

18 Responding Party objects to this request on the grounds it is overbroad and unduly
19 burdensome.

20 Responding Party objects to this request to the extent it may be construed to request the
21 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
22 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
23 attorneys for Responding Party; that contain privileged attorney-client communications; or that
24 are otherwise protected from production.

25 Responding Party objects to this request to the extent the request is oppressive and/or
26 merely intended to harass.

27
28

1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

4 Responding Party objects to this request as it assumes facts that have not been established.

5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 3:**

11 All of YOUR bank statements.

12 **RESPONSE TO REQUEST NO. 3:**

13 Responding Party objects to this request on the grounds that information regarding tax
14 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
15 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

16 Responding Party objects to this request to the extent the request is oppressive and/or
17 merely intended to harass.

18 Responding Party objects to this request on the ground that it is not relevant to the subject
19 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
20 evidence.

21 Responding Party objects to this request to the extent it requires it to obtain and produce
22 documents from person over whom it has no control.

23 Responding Party objects to this request on the grounds it is vague, ambiguous, or
24 otherwise lacks sufficient precision to permit a response.

25 Responding Party objects to this request to the extent it calls for the production of
26 documents that it would reveal its trade secrets or other confidential research, development,
27 commercial or proprietary information, or information that may be protected by a right of privacy
28

1 under either the United States Constitution, Article 1 of the Constitution of the State of California
2 or any other applicable law.

3 Responding Party objects to this request to the extent it seeks production of documents
4 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
5 discovery of admissible evidence.

6 Responding Party objects to this request on the grounds it is overbroad and unduly
7 burdensome.

8 Responding Party objects to this request to the extent it may be construed to request the
9 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
10 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
11 attorneys for Responding Party; that contain privileged attorney-client communications; or that
12 are otherwise protected from production.

13 Responding Party objects to this request to the extent the request is oppressive and/or
14 merely intended to harass.

15 This discovery request, has in substance been previously propounded. Continuous
16 discovery into the same matter constitutes oppression and Responding Party further objects on
17 that ground.

18 Responding Party objects to this request as it assumes facts that have not been established.

19 Responding Party objects to this request to the extent the demand adversely affects third
20 persons whose privacy would be infringed by disclosure of the documents.

21 **REQUEST NO. 4:**

22 All DOCUMENTS and DATA (including electronic mail and other
23 COMMUNICATIONS) that REFER or RELATE to YOUR expenses, including but not limited
24 to rent, utilities, insurance, fees, wages, taxes, interest, supplies, maintenance, travel, meal and
25 entertainment, and training.

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1 **RESPONSE TO REQUEST NO. 4:**

2 Responding Party objects to this request on the grounds that information regarding tax
3 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
4 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

5 Responding Party objects to this request to the extent the request is oppressive and/or
6 merely intended to harass.

7 Responding Party objects to this request on the ground that it is not relevant to the subject
8 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Responding Party objects to this request to the extent it requires it to obtain and produce
11 documents from person over whom it has no control.

12 Responding Party objects to this request on the grounds it is vague, ambiguous, or
13 otherwise lacks sufficient precision to permit a response.

14 Responding Party objects to this request to the extent it calls for the production of
15 documents that it would reveal its trade secrets or other confidential research, development,
16 commercial or proprietary information, or information that may be protected by a right of privacy
17 under either the United States Constitution, Article 1 of the Constitution of the State of California
18 or any other applicable law.

19 Responding Party objects to this request to the extent it seeks production of documents
20 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
21 discovery of admissible evidence.

22 Responding Party objects to this request on the grounds it is overbroad and unduly
23 burdensome.

24 Responding Party objects to this request to the extent it may be construed to request the
25 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
26 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
27 attorneys for Responding Party; that contain privileged attorney-client communications; or that
28 are otherwise protected from production.

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 This discovery request, has in substance been previously propounded. Continuous
4 discovery into the same matter constitutes oppression and Responding Party further objects on
5 that ground.

6 Responding Party objects to this request as it assumes facts that have not been established.

7 Responding Party objects to this request to the extent the demand adversely affects third
8 persons whose privacy would be infringed by disclosure of the documents.

9 Responding Party objects to this request on the grounds it violates California state law
10 governing health information privacy including the Confidentiality of Medical Information Act,
11 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

12 **REQUEST NO. 5:**

13 All DOCUMENTS and DATA (including electronic mail and other
14 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
15 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
16 including, by or between, YOU and any defendant in this ACTION.

17 **RESPONSE TO REQUEST NO. 5:**

18 Responding Party objects to this request on the grounds that information regarding tax
19 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
20 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

21 Responding Party objects to this request to the extent the request is oppressive and/or
22 merely intended to harass.

23 Responding Party objects to this request on the ground that it is not relevant to the subject
24 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Responding Party objects to this request to the extent it requires it to obtain and produce
27 documents from person over whom it has no control.

28

1 Responding Party objects to this request on the grounds it is vague, ambiguous, or
2 otherwise lacks sufficient precision to permit a response.

3 Responding Party objects to this request to the extent it calls for the production of
4 documents that it would reveal its trade secrets or other confidential research, development,
5 commercial or proprietary information, or information that may be protected by a right of privacy
6 under either the United States Constitution, Article 1 of the Constitution of the State of California
7 or any other applicable law.

8 Responding Party objects to this request to the extent it seeks production of documents
9 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
10 discovery of admissible evidence.

11 Responding Party objects to this request on the grounds it is overbroad and unduly
12 burdensome.

13 Responding Party objects to this request to the extent it may be construed to request the
14 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
15 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
16 attorneys for Responding Party; that contain privileged attorney-client communications; or that
17 are otherwise protected from production.

18 Responding Party objects to this request to the extent the request is oppressive and/or
19 merely intended to harass.

20 This discovery request, has in substance been previously propounded. Continuous
21 discovery into the same matter constitutes oppression and Responding Party further objects on
22 that ground.

23 Responding Party objects to this request as it assumes facts that have not been established.

24 Responding Party objects to this request to the extent the demand adversely affects third
25 persons whose privacy would be infringed by disclosure of the documents.

26 Responding Party objects to this request on the grounds it violates California state law
27 governing health information privacy including the Confidentiality of Medical Information Act,
28 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

1 **REQUEST NO. 6:**

2 All DOCUMENTS and DATA (including electronic mail and other
3 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
4 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
5 including, by or between, YOU and any natural or legal person involved in the cultivation,
6 growth, production, refinement, transfer, carry, transport, distribution, sale, purchase, and/or
7 financing of MEDICAL MARIJUANA.

8 **RESPONSE TO REQUEST NO. 6:**

9 Responding Party objects to this request on the grounds that information regarding tax
10 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
11 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

12 Responding Party objects to this request to the extent the request is oppressive and/or
13 merely intended to harass.

14 Responding Party objects to this request on the ground that it is not relevant to the subject
15 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
16 evidence.

17 Responding Party objects to this request to the extent it requires it to obtain and produce
18 documents from person over whom it has no control.

19 Responding Party objects to this request on the grounds it is vague, ambiguous, or
20 otherwise lacks sufficient precision to permit a response.

21 Responding Party objects to this request to the extent it calls for the production of
22 documents that it would reveal its trade secrets or other confidential research, development,
23 commercial or proprietary information, or information that may be protected by a right of privacy
24 under either the United States Constitution, Article 1 of the Constitution of the State of California
25 or any other applicable law.

26 Responding Party objects to this request to the extent it seeks production of documents
27 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
28 discovery of admissible evidence.

1 Responding Party objects to this request on the grounds it is overbroad and unduly
2 burdensome.

3 Responding Party objects to this request to the extent it may be construed to request the
4 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
5 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
6 attorneys for Responding Party; that contain privileged attorney-client communications; or that
7 are otherwise protected from production.

8 Responding Party objects to this request to the extent the request is oppressive and/or
9 merely intended to harass.

10 Responding Party objects to this request to the extent the request is oppressive and/or
11 merely intended to harass. This discovery request, has in substance been previously propounded. Continuous
12 discovery into the same matter constitutes oppression and Responding Party further objects on
13 that ground.

13 Responding Party objects to this request as it assumes facts that have not been established.

14 Responding Party objects to this request to the extent the demand adversely affects third
15 persons whose privacy would be infringed by disclosure of the documents.

16 Responding Party objects to this request on the grounds it violates California state law
17 governing health information privacy including the Confidentiality of Medical Information Act,
18 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

19 **REQUEST NO. 7:**

20 All DOCUMENTS and DATA (including electronic and other COMMUNICATIONS)
21 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for,
22 cash.

23 **RESPONSE TO REQUEST NO. 7:**

24 Responding Party objects to this request on the grounds that information regarding tax
25 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
26 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

27 Responding Party objects to this request to the extent the request is oppressive and/or
28 merely intended to harass.

1 Responding Party objects to this request on the ground that it is not relevant to the subject
2 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
3 evidence.

4 Responding Party objects to this request to the extent it requires it to obtain and produce
5 documents from person over whom it has no control.

6 Responding Party objects to this request on the grounds it is vague, ambiguous, or
7 otherwise lacks sufficient precision to permit a response.

8 Responding Party objects to this request to the extent it calls for the production of
9 documents that it would reveal its trade secrets or other confidential research, development,
10 commercial or proprietary information, or information that may be protected by a right of privacy
11 under either the United States Constitution, Article 1 of the Constitution of the State of California
12 or any other applicable law.

13 Responding Party objects to this request to the extent it seeks production of documents
14 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
15 discovery of admissible evidence.

16 Responding Party objects to this request on the grounds it is overbroad and unduly
17 burdensome.

18 Responding Party objects to this request to the extent it may be construed to request the
19 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
20 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
21 attorneys for Responding Party; that contain privileged attorney-client communications; or that
22 are otherwise protected from production.

23 Responding Party objects to this request to the extent the request is oppressive and/or
24 merely intended to harass.

25 This discovery request, has in substance been previously propounded. Continuous
26 discovery into the same matter constitutes oppression and Responding Party further objects on
27 that ground.

28 Responding Party objects to this request as it assumes facts that have not been established.

1 Responding Party objects to this request to the extent the demand adversely affects third
2 persons whose privacy would be infringed by disclosure of the documents.

3 Responding Party objects to this request on the grounds it violates California state law
4 governing health information privacy including the Confidentiality of Medical Information Act,
5 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

6 **REQUEST NO. 8:**

7 All DOCUMENTS and DATA (including electronic mail and other
8 COMMUNICATIONS) that REFER or RELATE to the cultivation, growth, production,
9 refinement, transfer, carry, transport, distribution, sale, purchase, and/or financing of MEDICAL
10 MARIJUANA.

11 **RESPONSE TO REQUEST NO. 8:**

12 Responding Party objects to this request on the grounds that information regarding tax
13 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
14 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

15 Responding Party objects to this request to the extent the request is oppressive and/or
16 merely intended to harass.

17 Responding Party objects to this request on the ground that it is not relevant to the subject
18 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
19 evidence.

20 Responding Party objects to this request to the extent it requires it to obtain and produce
21 documents from person over whom it has no control.

22 Responding Party objects to this request on the grounds it is vague, ambiguous, or
23 otherwise lacks sufficient precision to permit a response.

24 Responding Party objects to this request to the extent it calls for the production of
25 documents that it would reveal its trade secrets or other confidential research, development,
26 commercial or proprietary information, or information that may be protected by a right of privacy
27 under either the United States Constitution, Article 1 of the Constitution of the State of California
28 or any other applicable law.

1 Responding Party objects to this request to the extent it seeks production of documents
2 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
3 discovery of admissible evidence.

4 Responding Party objects to this request on the grounds it is overbroad and unduly
5 burdensome.

6 Responding Party objects to this request to the extent it may be construed to request the
7 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
8 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
9 attorneys for Responding Party; that contain privileged attorney-client communications; or that
10 are otherwise protected from production.

11 Responding Party objects to this request to the extent the request is oppressive and/or
12 merely intended to harass.

13 This discovery request, has in substance been previously propounded. Continuous
14 discovery into the same matter constitutes oppression and Responding Party further objects on
15 that ground.

16 Responding Party objects to this request as it assumes facts that have not been established.

17 Responding Party objects to this request to the extent the demand adversely affects third
18 persons whose privacy would be infringed by disclosure of the documents.

19 Responding Party objects to this request on the grounds it violates California state law
20 governing health information privacy including the Confidentiality of Medical Information Act,
21 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

22 **REQUEST NO. 9:**

23 All COMMUNICATIONS with, including, by or between, any defendant in this
24 ACTION.

25 **RESPONSE TO REQUEST NO. 9:**

26 Responding Party objects to this request on the grounds that information regarding tax
27 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
28 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 Responding Party objects to this request on the ground that it is not relevant to the subject
4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request to the extent it requires it to obtain and produce
7 documents from person over whom it has no control.

8 Responding Party objects to this request on the grounds it is vague, ambiguous, or
9 otherwise lacks sufficient precision to permit a response.

10 Responding Party objects to this request to the extent it calls for the production of
11 documents that it would reveal its trade secrets or other confidential research, development,
12 commercial or proprietary information, or information that may be protected by a right of privacy
13 under either the United States Constitution, Article 1 of the Constitution of the State of California
14 or any other applicable law.

15 Responding Party objects to this request to the extent it seeks production of documents
16 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
17 discovery of admissible evidence.

18 Responding Party objects to this request on the grounds it is overbroad and unduly
19 burdensome.

20 Responding Party objects to this request to the extent it may be construed to request the
21 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
22 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
23 attorneys for Responding Party; that contain privileged attorney-client communications; or that
24 are otherwise protected from production.

25 Responding Party objects to this request to the extent the request is oppressive and/or
26 merely intended to harass.

27
28

1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

4 Responding Party objects to this request as it assumes facts that have not been established.

5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 10:**

11 All COMMUNICATIONS with, including, by or between, any natural or legal person
12 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport,
13 distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

14 **RESPONSE TO REQUEST NO. 10:**

15 Responding Party objects to this request on the grounds that information regarding tax
16 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
17 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

18 Responding Party objects to this request to the extent the request is oppressive and/or
19 merely intended to harass.

20 Responding Party objects to this request on the ground that it is not relevant to the subject
21 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Responding Party objects to this request to the extent it requires it to obtain and produce
24 documents from person over whom it has no control.

25 Responding Party objects to this request on the grounds it is vague, ambiguous, or
26 otherwise lacks sufficient precision to permit a response.

27 Responding Party objects to this request to the extent it calls for the production of
28 documents that it would reveal its trade secrets or other confidential research, development,

1 commercial or proprietary information, or information that may be protected by a right of privacy
2 under either the United States Constitution, Article 1 of the Constitution of the State of California
3 or any other applicable law.

4 Responding Party objects to this request to the extent it seeks production of documents
5 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
6 discovery of admissible evidence.

7 Responding Party objects to this request on the grounds it is overbroad and unduly
8 burdensome.

9 Responding Party objects to this request to the extent it may be construed to request the
10 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
11 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
12 attorneys for Responding Party; that contain privileged attorney-client communications; or that
13 are otherwise protected from production.

14 Responding Party objects to this request to the extent the request is oppressive and/or
15 merely intended to harass.

16 This discovery request, has in substance been previously propounded. Continuous
17 discovery into the same matter constitutes oppression and Responding Party further objects on
18 that ground.

19 Responding Party objects to this request as it assumes facts that have not been established.

20 Responding Party objects to this request to the extent the demand adversely affects third
21 persons whose privacy would be infringed by disclosure of the documents.

22 Responding Party objects to this request on the grounds it violates California state law
23 governing health information privacy including the Confidentiality of Medical Information Act,
24 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

25 **REQUEST NO. 11:**

26 All DOCUMENTS and DATA (including electronic mail and other
27 COMMUNICATIONS) that REFER or RELATE to YOUR Articles of Incorporation and any
28 amendments thereto, all bylaws and amendments thereto, and all meeting minutes.

1 **RESPONSE TO REQUEST NO. 11:**

2 Responding Party objects to this request on the grounds that information regarding tax
3 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
4 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

5 Responding Party objects to this request to the extent the request is oppressive and/or
6 merely intended to harass.

7 Responding Party objects to this request on the ground that it is not relevant to the subject
8 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
9 evidence.

10 Responding Party objects to this request to the extent it requires it to obtain and produce
11 documents from person over whom it has no control.

12 Responding Party objects to this request on the grounds it is vague, ambiguous, or
13 otherwise lacks sufficient precision to permit a response.

14 Responding Party objects to this request to the extent it calls for the production of
15 documents that it would reveal its trade secrets or other confidential research, development,
16 commercial or proprietary information, or information that may be protected by a right of privacy
17 under either the United States Constitution, Article 1 of the Constitution of the State of California
18 or any other applicable law.

19 Responding Party objects to this request to the extent it seeks production of documents
20 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
21 discovery of admissible evidence.

22 Responding Party objects to this request on the grounds it is overbroad and unduly
23 burdensome.

24 Responding Party objects to this request to the extent it may be construed to request the
25 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
26 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
27 attorneys for Responding Party; that contain privileged attorney-client communications; or that
28 are otherwise protected from production.

AUSTIN LEGAL GROUP, APC
3990 Old Town Ave, Ste A-112
San Diego, CA 92110

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 This discovery request, has in substance been previously propounded. Continuous
4 discovery into the same matter constitutes oppression and Responding Party further objects on
5 that ground.

6 Responding Party objects to this request as it assumes facts that have not been established.

7 Responding Party objects to this request to the extent the demand adversely affects third
8 persons whose privacy would be infringed by disclosure of the documents.

9 Responding Party objects to this request on the grounds it violates California state law
10 governing health information privacy including the Confidentiality of Medical Information Act,
11 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

12
13 DATED: February 5, 2018

AUSTIN LEGAL GROUP, APC

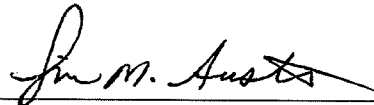
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15 By: 
16 Gina Austin/Tamara Leetham
17 Attorneys for Far West Operating, LLC
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EXHIBIT P

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6 Attorneys for Defendants Point Loma Patients
7 Consumer Cooperative, Golden State Greens,
Far West Operating, Far West Management, Far
8 West Staffing

9
10 **SUPERIOR COURT OF CALIFORNIA**
COUNTY OF SAN DIEGO, CENTRAL DIVISION

11
12 KARL BECK, individually and on behalf
13 of all similarly situated California
residents,

14 Plaintiff,

15 v.

16 POINT LOMA PATIENTS CONSUMER
17 COOPERATIVE CORPORATION, A
California Corporation, ADAM KNOFF,
18 an Individual, JUSTUS H. HENKES IV, an
Individual, 419 CONSULTING INC., a
19 California Corporation, GOLDEN STATE
GREENS LLC, a California LLC, FAR
20 WEST MANAGEMENT, LLC, a
California LLC, FAR WEST
21 OPERATING, LLC, a California LLC,
FAR WEST STAFFING, LLC, a
22 California LLC, and DOES 1 through 50,
inclusive.

23 Defendants.
24

CASE NO. 37-2017-00037524-CU-BT-CTL

**DEFENDANT FAR WEST
STAFFING'S RESPONSES TO
REQUEST FOR PRODUCTION OF
DOCUMENTS (SET
ONE)**

25 **PROPOUNDING PARTY:** Plaintiff KARL BECK

26 **RESPONDING PARTY:** Defendant FAR WEST STAFFING

27 **SET NUMBER:** One
28

1 Defendant FAR WEST STAFFING ("Defendant" or "Responding Party") submits the
2 following responses and objections to plaintiff KARL BECK's (Plaintiff" or "Propounding
3 Party") Requests for Production of Documents, Set One.

4 **Responses To Request for Production of Documents**

5 **REQUEST NO. 1:**

6 All DOCUMENTS and DATA (including electronic mail and other
7 COMMUNICATIONS) that REFER or RELATE to any contracts or agreements, formal or
8 informal, between or among YOU and any defendant in this ACTION.

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

10 Responding Party objects to this request to the extent it requires it to obtain and produce
11 documents from person over whom it has no control.

12 Responding Party objects to this request on the grounds it is vague, ambiguous, or
13 otherwise lacks sufficient precision to permit a response.

14 Responding Party objects to this request to the extent it calls for the production of
15 documents that it would reveal its trade secrets or other confidential research, development,
16 commercial or proprietary information, or information that may be protected by a right of privacy
17 under either the United States Constitution, Article 1 of the Constitution of the State of California
18 or any other applicable law.

19 Responding Party objects to this request to the extent it seeks production of documents
20 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
21 discovery of admissible evidence.

22 Responding Party objects to this request on the grounds it is overbroad and unduly
23 burdensome.

24 Responding Party objects to this request to the extent it may be construed to request the
25 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
26 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
27 attorneys for Responding Party; that contain privileged attorney-client communications; or that
28 are otherwise protected from production.

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 Responding Party objects to this request on the ground that it is not relevant to the subject
4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request on the ground that it seeks disclosure of
7 documents in violation of Responding Party's constitutional right to privacy.

8 Responding Party objects to this request on the grounds it violates California state law
9 governing health information privacy including the Confidentiality of Medical Information Act,
10 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

11 **REQUEST NO. 2:**

12 All DOCUMENTS and DATA (including electronic mail and other
13 COMMUNICATIONS) that REFER or RELATE to YOUR tax returns.

14 **RESPONSE TO REQUEST NO. 2:**

15 Responding Party objects to this request on the grounds that information regarding tax
16 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
17 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

18 Responding Party objects to this request to the extent the request is oppressive and/or
19 merely intended to harass.

20 Responding Party objects to this request on the ground that it is not relevant to the subject
21 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Responding Party objects to this request to the extent it requires it to obtain and produce
24 documents from person over whom it has no control.

25 Responding Party objects to this request on the grounds it is vague, ambiguous, or
26 otherwise lacks sufficient precision to permit a response.

27 Responding Party objects to this request to the extent it calls for the production of
28 documents that it would reveal its trade secrets or other confidential research, development,

1 commercial or proprietary information, or information that may be protected by a right of privacy
2 under either the United States Constitution, Article 1 of the Constitution of the State of California
3 or any other applicable law.

4 Responding Party objects to this request to the extent it seeks production of documents
5 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
6 discovery of admissible evidence.

7 Responding Party objects to this request on the grounds it is overbroad and unduly
8 burdensome.

9 Responding Party objects to this request to the extent it may be construed to request the
10 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
11 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
12 attorneys for Responding Party; that contain privileged attorney-client communications; or that
13 are otherwise protected from production.

14 Responding Party objects to this request to the extent the request is oppressive and/or
15 merely intended to harass.

16 This discovery request, has in substance been previously propounded. Continuous
17 discovery into the same matter constitutes oppression and Responding Party further objects on
18 that ground.

19 Responding Party objects to this request as it assumes facts that have not been established.

20 Responding Party objects to this request to the extent the demand adversely affects third
21 persons whose privacy would be infringed by disclosure of the documents.

22 Responding Party objects to this request on the grounds it violates California state law
23 governing health information privacy including the Confidentiality of Medical Information Act,
24 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

25 **REQUEST NO. 3:**

26 All of YOUR bank statements.

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1 **RESPONSE TO REQUEST NO. 3:**

2 Responding Party objects to this request to the extent the request is oppressive and/or
3 merely intended to harass.

4 Responding Party objects to this request on the ground that it is not relevant to the subject
5 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
6 evidence.

7 Responding Party objects to this request to the extent it requires it to obtain and produce
8 documents from person over whom it has no control.

9 Responding Party objects to this request on the grounds it is vague, ambiguous, or
10 otherwise lacks sufficient precision to permit a response.

11 Responding Party objects to this request to the extent it calls for the production of
12 documents that it would reveal its trade secrets or other confidential research, development,
13 commercial or proprietary information, or information that may be protected by a right of privacy
14 under either the United States Constitution, Article 1 of the Constitution of the State of California
15 or any other applicable law.

16 Responding Party objects to this request to the extent it seeks production of documents
17 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
18 discovery of admissible evidence.

19 Responding Party objects to this request on the grounds it is overbroad and unduly
20 burdensome.

21 Responding Party objects to this request to the extent it may be construed to request the
22 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
23 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
24 attorneys for Responding Party; that contain privileged attorney-client communications; or that
25 are otherwise protected from production.

26 Responding Party objects to this request to the extent the request is oppressive and/or
27 merely intended to harass.

28

1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

4 Responding Party objects to this request as it assumes facts that have not been established.

5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 4:**

11 All DOCUMENTS and DATA (including electronic mail and other
12 COMMUNICATIONS) that REFER or RELATE to YOUR expenses, including but not limited
13 to rent, utilities, insurance, fees, wages, taxes, interest, supplies, maintenance, travel, meals and
14 entertainment, and training.

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

16 Responding Party objects to this request on the grounds that information regarding tax
17 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
18 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

19 Responding Party objects to this request to the extent the request is oppressive and/or
20 merely intended to harass.

21 Responding Party objects to this request on the ground that it is not relevant to the subject
22 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
23 evidence.

24 Responding Party objects to this request to the extent it requires it to obtain and produce
25 documents from person over whom it has no control.

26 Responding Party objects to this request on the grounds it is vague, ambiguous, or
27 otherwise lacks sufficient precision to permit a response.

28

1 Responding Party objects to this request to the extent it calls for the production of
2 documents that it would reveal its trade secrets or other confidential research, development,
3 commercial or proprietary information, or information that may be protected by a right of privacy
4 under either the United States Constitution, Article 1 of the Constitution of the State of California
5 or any other applicable law.

6 Responding Party objects to this request to the extent it seeks production of documents
7 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
8 discovery of admissible evidence.

9 Responding Party objects to this request on the grounds it is overbroad and unduly
10 burdensome.

11 Responding Party objects to this request to the extent it may be construed to request the
12 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
13 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
14 attorneys for Responding Party; that contain privileged attorney-client communications; or that
15 are otherwise protected from production.

16 Responding Party objects to this request to the extent the request is oppressive and/or
17 merely intended to harass.

18 This discovery request, has in substance been previously propounded. Continuous
19 discovery into the same matter constitutes oppression and Responding Party further objects on
20 that ground.

21 Responding Party objects to this request as it assumes facts that have not been established.

22 Responding Party objects to this request to the extent the demand adversely affects third
23 persons whose privacy would be infringed by disclosure of the documents.

24 Responding Party objects to this request on the grounds it violates California state law
25 governing health information privacy including the Confidentiality of Medical Information Act,
26 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

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1 **REQUEST NO. 5:**

2 All DOCUMENTS and DATA (including electronic mail and other
3 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
4 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
5 including, by or between, YOU and any defendant in this ACTION.

6 **RESPONSE TO REQUEST NO. 5:**

7 Responding Party objects to this request on the grounds that information regarding tax
8 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
9 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

10 Responding Party objects to this request to the extent the request is oppressive and/or
11 merely intended to harass.

12 Responding Party objects to this request on the ground that it is not relevant to the subject
13 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
14 evidence.

15 Responding Party objects to this request to the extent it requires it to obtain and produce
16 documents from person over whom it has no control.

17 Responding Party objects to this request on the grounds it is vague, ambiguous, or
18 otherwise lacks sufficient precision to permit a response.

19 Responding Party objects to this request to the extent it calls for the production of
20 documents that it would reveal its trade secrets or other confidential research, development,
21 commercial or proprietary information, or information that may be protected by a right of privacy
22 under either the United States Constitution, Article 1 of the Constitution of the State of California
23 or any other applicable law.

24 Responding Party objects to this request to the extent it seeks production of documents
25 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
26 discovery of admissible evidence.

27 Responding Party objects to this request on the grounds it is overbroad and unduly
28 burdensome.

1 Responding Party objects to this request to the extent it may be construed to request the
2 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
3 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
4 attorneys for Responding Party; that contain privileged attorney-client communications; or that
5 are otherwise protected from production.

6 Responding Party objects to this request to the extent the request is oppressive and/or
7 merely intended to harass.

8 This discovery request, has in substance been previously propounded. Continuous
9 discovery into the same matter constitutes oppression and Responding Party further objects on
10 that ground.

11 Responding Party objects to this request as it assumes facts that have not been established.

12 Responding Party objects to this request to the extent the demand adversely affects third
13 persons whose privacy would be infringed by disclosure of the documents.

14 Responding Party objects to this request on the grounds it violates California state law
15 governing health information privacy including the Confidentiality of Medical Information Act,
16 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

17 **REQUEST NO. 6:**

18 All DOCUMENTS and DATA (including electronic mail and other
19 COMMUNICATIONS) that REFER or RELATE to any salary, wage, compensation, pay,
20 remuneration, emolument, benefit, kick-back, gift, donation or other transfer of value with,
21 including, by or between, YOU and any natural or legal person involved in the cultivation,
22 growth, production, refinement, transfer, carry, transport, distribution, sale, purchase, and/or
23 financing of MEDICAL MARIJUANA.

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

25 Responding Party objects to this request on the grounds that information regarding tax
26 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
27 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)
28

1 Responding Party objects to this request to the extent the request is oppressive and/or
2 merely intended to harass.

3 Responding Party objects to this request on the ground that it is not relevant to the subject
4 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
5 evidence.

6 Responding Party objects to this request to the extent it requires it to obtain and produce
7 documents from person over whom it has no control.

8 Responding Party objects to this request on the grounds it is vague, ambiguous, or
9 otherwise lacks sufficient precision to permit a response.

10 Responding Party objects to this request to the extent it calls for the production of
11 documents that it would reveal its trade secrets or other confidential research, development,
12 commercial or proprietary information, or information that may be protected by a right of privacy
13 under either the United States Constitution, Article 1 of the Constitution of the State of California
14 or any other applicable law.

15 Responding Party objects to this request to the extent it seeks production of documents
16 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
17 discovery of admissible evidence.

18 Responding Party objects to this request on the grounds it is overbroad and unduly
19 burdensome.

20 Responding Party objects to this request to the extent it may be construed to request the
21 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
22 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
23 attorneys for Responding Party; that contain privileged attorney-client communications; or that
24 are otherwise protected from production.

25 Responding Party objects to this request to the extent the request is oppressive and/or
26 merely intended to harass.

27

28

1 This discovery request, has in substance been previously propounded. Continuous
2 discovery into the same matter constitutes oppression and Responding Party further objects on
3 that ground.

4 Responding Party objects to this request as it assumes facts that have not been established.

5 Responding Party objects to this request to the extent the demand adversely affects third
6 persons whose privacy would be infringed by disclosure of the documents.

7 Responding Party objects to this request on the grounds it violates California state law
8 governing health information privacy including the Confidentiality of Medical Information Act,
9 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

10 **REQUEST NO. 7:**

11 All DOCUMENTS and DATA (including electronic and other COMMUNICATIONS)
12 that REFER or RELATE to YOUR payment in, payment to, handling of, and accounting for,
13 cash.

14 **RESPONSE TO REQUEST NO. 7:**

15 Responding Party objects to this request on the grounds that information regarding tax
16 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
17 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

18 Responding Party objects to this request to the extent the request is oppressive and/or
19 merely intended to harass.

20 Responding Party objects to this request on the ground that it is not relevant to the subject
21 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
22 evidence.

23 Responding Party objects to this request to the extent it requires it to obtain and produce
24 documents from person over whom it has no control.

25 Responding Party objects to this request on the grounds it is vague, ambiguous, or
26 otherwise lacks sufficient precision to permit a response.

27 Responding Party objects to this request to the extent it calls for the production of
28 documents that it would reveal its trade secrets or other confidential research, development,

1 commercial or proprietary information, or information that may be protected by a right of privacy
2 under either the United States Constitution, Article 1 of the Constitution of the State of California
3 or any other applicable law.

4 Responding Party objects to this request to the extent it seeks production of documents
5 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
6 discovery of admissible evidence.

7 Responding Party objects to this request on the grounds it is overbroad and unduly
8 burdensome.

9 Responding Party objects to this request to the extent it may be construed to request the
10 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
11 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
12 attorneys for Responding Party; that contain privileged attorney-client communications; or that
13 are otherwise protected from production.

14 Responding Party objects to this request to the extent the request is oppressive and/or
15 merely intended to harass.

16 This discovery request, has in substance been previously propounded. Continuous
17 discovery into the same matter constitutes oppression and Responding Party further objects on
18 that ground.

19 Responding Party objects to this request as it assumes facts that have not been established.

20 Responding Party objects to this request to the extent the demand adversely affects third
21 persons whose privacy would be infringed by disclosure of the documents.

22 Responding Party objects to this request on the grounds it violates California state law
23 governing health information privacy including the Confidentiality of Medical Information Act,
24 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

25 **REQUEST NO. 8:**

26 All DOCUMENTS and DATA (including electronic mail and other
27 COMMUNICATIONS) that REFER or RELATE to the cultivation, growth, production,
28

1 refinement, transfer, carry, transport, distribution, sale, purchase, and/or financing of MEDICAL
2 MARIJUANA.

3 **RESPONSE TO REQUEST NO. 8:**

4 Responding Party objects to this request on the grounds that information regarding tax
5 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
6 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

7 Responding Party objects to this request to the extent the request is oppressive and/or
8 merely intended to harass.

9 Responding Party objects to this request on the ground that it is not relevant to the subject
10 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
11 evidence.

12 Responding Party objects to this request to the extent it requires it to obtain and produce
13 documents from person over whom it has no control.

14 Responding Party objects to this request on the grounds it is vague, ambiguous, or
15 otherwise lacks sufficient precision to permit a response.

16 Responding Party objects to this request to the extent it calls for the production of
17 documents that it would reveal its trade secrets or other confidential research, development,
18 commercial or proprietary information, or information that may be protected by a right of privacy
19 under either the United States Constitution, Article 1 of the Constitution of the State of California
20 or any other applicable law.

21 Responding Party objects to this request to the extent it seeks production of documents
22 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
23 discovery of admissible evidence.

24 Responding Party objects to this request on the grounds it is overbroad and unduly
25 burdensome.

26 Responding Party objects to this request to the extent it may be construed to request the
27 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
28 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any

1 attorneys for Responding Party; that contain privileged attorney-client communications; or that
2 are otherwise protected from production.

3 Responding Party objects to this request to the extent the request is oppressive and/or
4 merely intended to harass.

5 This discovery request, has in substance been previously propounded. Continuous
6 discovery into the same matter constitutes oppression and Responding Party further objects on
7 that ground.

8 Responding Party objects to this request as it assumes facts that have not been established.

9 Responding Party objects to this request to the extent the demand adversely affects third
10 persons whose privacy would be infringed by disclosure of the documents.

11 Responding Party objects to this request on the grounds it violates California state law
12 governing health information privacy including the Confidentiality of Medical Information Act,
13 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

14 **REQUEST NO. 9:**

15 All COMMUNICATIONS with, including, by or between, any defendant in this
16 ACTION.

17 **RESPONSE TO REQUEST NO. 9:**

18 Responding Party objects to this request on the grounds that information regarding tax
19 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
20 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

21 Responding Party objects to this request to the extent the request is oppressive and/or
22 merely intended to harass.

23 Responding Party objects to this request on the ground that it is not relevant to the subject
24 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
25 evidence.

26 Responding Party objects to this request to the extent it requires it to obtain and produce
27 documents from person over whom it has no control.

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1 Responding Party objects to this request on the grounds it is vague, ambiguous, or
2 otherwise lacks sufficient precision to permit a response.

3 Responding Party objects to this request to the extent it calls for the production of
4 documents that it would reveal its trade secrets or other confidential research, development,
5 commercial or proprietary information, or information that may be protected by a right of privacy
6 under either the United States Constitution, Article 1 of the Constitution of the State of California
7 or any other applicable law.

8 Responding Party objects to this request to the extent it seeks production of documents
9 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
10 discovery of admissible evidence.

11 Responding Party objects to this request on the grounds it is overbroad and unduly
12 burdensome.

13 Responding Party objects to this request to the extent it may be construed to request the
14 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
15 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
16 attorneys for Responding Party; that contain privileged attorney-client communications; or that
17 are otherwise protected from production.

18 Responding Party objects to this request to the extent the request is oppressive and/or
19 merely intended to harass.

20 This discovery request, has in substance been previously propounded. Continuous
21 discovery into the same matter constitutes oppression and Responding Party further objects on
22 that ground.

23 Responding Party objects to this request as it assumes facts that have not been established.

24 Responding Party objects to this request to the extent the demand adversely affects third
25 persons whose privacy would be infringed by disclosure of the documents.

26 Responding Party objects to this request on the grounds it violates California state law
27 governing health information privacy including the Confidentiality of Medical Information Act,
28 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

1 **REQUEST NO. 10:**

2 All COMMUNICATIONS with, including, by or between, any natural or legal person
3 RELATED to the cultivation, growth, production, refinement, transfer, carry, transport,
4 distribution, sale, purchase, and/or financing of MEDICAL MARIJUANA.

5 **RESPONSE TO REQUEST NO. 10:**

6 Responding Party objects to this request on the grounds that information regarding tax
7 returns, W-2, and/or 1099 forms, is privileged under federal and state law. (See *Webb v.*
8 *Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71 Cal.App.3d 141.)

9 Responding Party objects to this request to the extent the request is oppressive and/or
10 merely intended to harass.

11 Responding Party objects to this request on the ground that it is not relevant to the subject
12 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
13 evidence.

14 Responding Party objects to this request to the extent it requires it to obtain and produce
15 documents from person over whom it has no control.

16 Responding Party objects to this request on the grounds it is vague, ambiguous, or
17 otherwise lacks sufficient precision to permit a response.

18 Responding Party objects to this request to the extent it calls for the production of
19 documents that it would reveal its trade secrets or other confidential research, development,
20 commercial or proprietary information, or information that may be protected by a right of privacy
21 under either the United States Constitution, Article 1 of the Constitution of the State of California
22 or any other applicable law.

23 Responding Party objects to this request to the extent it seeks production of documents
24 that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the
25 discovery of admissible evidence.

26 Responding Party objects to this request on the grounds it is overbroad and unduly
27 burdensome.

28

1 Responding Party objects to this request to the extent it may be construed to request the
2 production of documents prepared in anticipation of litigation; that constitute or reflect attorney
3 work product; that disclose the mental impressions, conclusions, opinions or legal theories of any
4 attorneys for Responding Party; that contain privileged attorney-client communications; or that
5 are otherwise protected from production.

6 Responding Party objects to this request to the extent the request is oppressive and/or
7 merely intended to harass.

8 This discovery request, has in substance been previously propounded. Continuous
9 discovery into the same matter constitutes oppression and Responding Party further objects on
10 that ground.

11 Responding Party objects to this request as it assumes facts that have not been established.

12 Responding Party objects to this request to the extent the demand adversely affects third
13 persons whose privacy would be infringed by disclosure of the documents.

14 Responding Party objects to this request on the grounds it violates California state law
15 governing health information privacy including the Confidentiality of Medical Information Act,
16 California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

17 **REQUEST NO. 11:**

18 All DOCUMENTS and DATA (including electronic mail and other
19 COMMUNICATIONS) that REFER or RELATE to YOUR Articles of Incorporation and any
20 amendments thereto, all bylaws and amendments thereto, and all meeting minutes.

21 **RESPONSE TO REQUEST NO. 11:**

22 Responding Party objects to this request to the extent the request is oppressive and/or
23 merely intended to harass.

24 Responding Party objects to this request on the ground that it is not relevant to the subject
25 matter of this action nor is it reasonably calculated to lead to the discovery of admissible
26 evidence.

27 Responding Party objects to this request to the extent it requires it to obtain and produce
28 documents from person over whom it has no control.

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Responding Party objects to this request to the extent it seeks production of documents that are neither relevant to the subject matter of this action, nor reasonably calculate to lead to the discovery of admissible evidence.

Responding Party objects to this request on the grounds it is overbroad and unduly burdensome.

Responding Party objects to this request to the extent it may be construed to request the production of documents prepared in anticipation of litigation; that constitute or reflect attorney work product; that disclose the mental impressions, conclusions, opinions or legal theories of any attorneys for Responding Party; that contain privileged attorney-client communications; or that are otherwise protected from production.

Responding Party objects to this request to the extent the request is oppressive and/or merely intended to harass.

Responding Party objects to this request on the grounds it violates California state law governing health information privacy including the Confidentiality of Medical Information Act, California Patient Access to Health Records Act and the Lanterman-Patris-Short Act.

DATED: February 5, 2018

AUSTIN LEGAL GROUP, APC

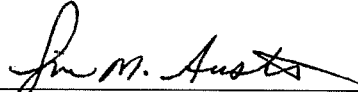
By: 
Gina Austin/Tamara Leetham
Attorneys for Far West Operating, LLC

EXHIBIT Q



February 22, 2018

Via Electronic Mail

Tamara Leetham
AUSTIN LEGAL GROUP, APC
3990 Old Town Ave, Suite A112
San Diego, 92110
tamara@austinlegalgroup.com

Re: *Meet and Confer – Plaintiff's Request for Production re Corporate Documents and Contracts between Defendants*

Dear Tammy,

This constitutes Plaintiff's meet and confer prior to filing a motion to compel Plaintiff's Request for production to certain document demands. As you know, in denying Plaintiff's motion to appoint an independent accountant, the court stated

[S]uch a ruling is dependent on factual issues that cannot be adjudicated at this time. Such issues include the nature of the applicable corporate governance documents, Defendants' relationship to each other, Plaintiff's status as a "member" of the cooperative, etc... This denial is without prejudice of Plaintiff's ability to adjudicate this important issue via any available future proceeding (e.g., Motion for summary adjudication or trial).

January 19, 2018 Minute Order.

Plaintiff has asked that such documents to be produced in this case. For example, Request No. 3 to the PLPCC, and No. 11 to the "Shell Companies" ask for articles, bylaws and meeting minutes (as more fully described in the Requests). No. 4 to PLPCC, and No. 1 to the Individual Defendants and Shell Companies, ask for agreements between Defendants and communications related thereto (as more fully described in the Requests).

Defendants' boilerplate objections are insufficient to warrant refusal to produce these documents. *See Korea Data Systems Co. Ltd. v. Sup. Ct.* (1997) 51 Cal.App.4th 1513, 1516 ("boiler plate" objections are improper because the CODE OF CIVIL PROC. requires specificity).

Therefore, we urge Defendants' to amend their responses to these Requests to agree to produce the requested materials. As stated in our Rule 3.722 conference this morning, Plaintiff requires that articles, bylaws, meeting minutes, and contracts be produced in native format. Responsive electronic mail can be produced in a format agreed to by the parties.

A handwritten signature in black ink, appearing to read 'The Restis Law Firm, P.C.', is written over a horizontal line.

Please let me know by close of Business on February 28th, whether Defendants will amend these responses and produce the requested documents.

Sincerely,



William R. Restis, Esq.

THE RESTIS LAW FIRM, P.C.
william@restislaw.com

Cc: Jeffrey R. Krinsk, Esq.
Matthew Dart, Esq.



EXHIBIT R



March 9, 2018

Via Electronic Mail

Tamara Leetham
AUSTIN LEGAL GROUP, APC
3990 Old Town Ave, Suite A112
San Diego, 92110
tamara@austinlegalgroup.com

Re: Meet and Confer – Plaintiff's Request for Production to all Defendants (Set One)

Dear Tammy and Matt,

This constitutes Plaintiff's meet and confer on the above discovery in advance of filing a motion to compel. After you have an opportunity to consider Plaintiff's position, I propose a call to see if we can come to an accord, or whether motion practice is the only way forward.

I. REQUESTS FOR PRODUCTION

a. GENERAL OBJECTIONS

i. Oppression / Overbroad / Unduly Burdensome

While Plaintiff is understanding of these objections, Defendants have failed to provide any factual basis to support them. Objections should be made with specificity and provide the basis to allow an intelligent response. *See Korea Data Systems Co. Ltd. v. Sup. Ct.* (1997) 51 Cal.App.4th 1513, 1516 ("boiler plate" objections are improper because the CODE OF CIVIL PROC. requires specificity); *W. Pico Furniture Co. v. Sup. Ct.* 56 Cal. 2d 407, 417 (1961) ("The objection based upon burden must be sustained by evidence showing the quantum of work required, while to support an objection of oppression there must be some showing either of an intent to create an unreasonable burden or that the ultimate effect of the burden is incommensurate with the result sought.")

In addition, Defendants were required to conduct a good faith investigation to obtain the responsive information at the time of responding to the request. *See* CODE OF CIVIL PROC. § 2031.010; *Regency Health Services, Inc. v. Sup. Ct.* (1998) 64 Cal. App. 4th 1496, 1504.

Accordingly, Please provide a factual basis for these objections so Plaintiff can consider them, or move to compel if Defendants have no justifiable basis.

A handwritten signature in black ink, appearing to read 'The Restis Law Firm, P.C.', is written over a horizontal line.

ii. Attorney Client / Work Product

Plaintiff of course does not expect Defendants to produce privileged materials. However, Plaintiff will require the production of a privilege log for responsive materials that are withheld.

Please be sure to provide sufficient factual support for Plaintiff to evaluate the *bona fides* of Defendants' claims of privilege. See CODE OF CIVIL PROC. § 2031.240; also, *Bank of Am., N.A. v. Superior Court of Orange Cnty.* (2013) 212 Cal. App. 4th 1076, 1098 ("Recent legislation amended subdivision (c)(1) of Code of Civil Procedure section 2031.240 to require the preparation of a privilege log "if necessary" to "provide sufficient factual information for other parties to evaluate the merits" of a claim of privilege or protected work product.")

iii. Assumes Facts

Defendants objected that the Requests "assumes facts that have not been established." This is not a valid objection to production requests. Please confirm in writing that Defendants are not withholding responsive information on the basis of this "objection."

iv. Health Information Privacy

While it is theoretically possible that some yet to be propounded requests could implicate HIPAA or the CMIA, Plaintiff has not requested that Defendants produce any such information.

The Patient Access to Health Records Act establishes a patient's right to see and receive copies of his or her medical records. The Lanterman-Petris-Short (LPS) Act provides guidelines for handling involuntary civil commitment of individuals to mental health institutions in the State of California. Thus, these statutes are inapplicable, and Defendants' objection thereon is frivolous. Please confirm in writing that Defendants are not withholding any responsive materials on the basis of this objection.

b. SPECIFIC RESPONSES

i. PLPCC No. 2

Plaintiff agrees to limit Request No 2 to the PLPCC to DOCUMENTS and DATA reflecting all agreements with Sinner Brothers, Inc., and amendments and attachments thereto, as well as all payments to Sinner Brothers, Inc.

DOCUMENTS reflecting payments should be produced in native format.

ii. PLPCC No 5, Individual Defendants No. 9, Shell Companies No. 9

COMMUNICATIONS between all Defendants in this Action, both individually and in their capacity as officers and directors entities, are routine.

Accordingly, all COMMUNICATIONS (as defined) must be produced. Responsive information can be produced in TIFF, text readable format, provided that any attachments are produced in native format.



To save on electronic discovery costs, all non-privileged COMMUNICATIONS should be produced, regardless of relevancy. Since the parties have agreed to a Claw-back provision, pre-production review need not be burdensome.

iii. PLPCC No. 6, Individual Defendants No. 8 and 10, and Shell Companies No. 8 and 10

Plaintiff agrees to limit responsive information to related to the “sale, purchase, and/or financing of MEDICAL MARIJUANA.”

iv. PLPCC No. 7, Individual Defendants No. 7, Shell Companies No. 7

Plaintiff’s Complaint alleges that Defendants’ medical marijuana business is all cash. How each of the Defendants transact in cash is highly relevant to the merits of Plaintiff’s case. All responsive information must be produced.

v. Individual Defendants No. 2, Shell Companies No. 2

Although Defendants are correct that there is a tax return privilege, that privilege is disregarded *inter alia* when the gravamen of the complaint is inconsistent with assertion of the privilege, or where a legislatively declared public policy outweighs the interests underlying the privilege. *See Schnabel v. Superior Court*, 5 Cal. 4th 704, 722 (1993) (ordering disclosure of tax returns because “legislatively declared public policy in favor of full disclosure in a marital dissolution proceeding, warrant an exception to the privilege in this case limited to those tax returns that are reasonably related to the purpose for which they are sought”) *Weingarten, supra*, 102 Cal.App.4th at p. 275 (“Weingarten intentionally interfered with plaintiffs' ability to obtain relevant information through legitimate means, and then sought to hide behind the tax return privilege to ensure no relevant information would be revealed to plaintiffs.”); *Li v. Yan*, 247 Cal. App. 4th 56, 66-68 (2016) (ordering production of tax returns where necessary to effect public policy of “prevent[ing] fraud against creditors. And against lenders. And perhaps against the court.”); *Slojewski v. Allstate Ins. Co.*, 2013 U.S. Dist. LEXIS 37266, at *9 (N.D. Cal. Mar. 18, 2013) (in insurance fraud case, ordering production of tax returns subject to protective order because “the disclosure of the tax returns at issue here is supported by the public policy in uncovering, preventing and punishing insurance fraud in California”); *Garcia v. Progressive Choice Ins. Co.*, 2011 U.S. Dist. LEXIS 105543, 2011 WL 4356209, at *4 (S.D. Cal. Sept. 16, 2011) (“The Court finds that this public policy in uncovering, preventing and punishing insurance fraud is significant enough to warrant application of the public policy exception to California's privilege regarding tax returns.); *Small v. Travelers Prop. Cas. Co. of Am.*, 2010 U.S. Dist. LEXIS 61308, at *3-8 (S.D. Cal. June 2, 2010) (ordering production of tax return documents pursuant to protective order *attorneys eyes only* where the gravamen of the lawsuit “directly implicate” financial information contained returns and because the privilege is “qualified not absolute”)

Here, the gravamen of Plaintiff’s complaint is inconsistent with Defendant’s assertion of the privilege. And the important non-profit policies found in the Cooperative Corporations Code and medical marijuana laws also counsel against the privilege. Accordingly, if Defendants refuse to produce requested tax return documentation, Plaintiff will move to compel.



vi. Individual Defendants No. 3, Shell Companies No. 3

The relevancy of bank statements can hardly be questioned, as such all responsive information must be produced.

vii. Individual Defendants No. 4, Shell Companies No. 4

Expenses incurred by the Individual Defendants and Shell Companies related to medical marijuana are clearly germane to this litigation, and must be produced.

viii. Individual Defendants No. 5 and 6, Shell Companies No. 5 and 6

Income or any benefit to the Individual Defendants from any other Defendant is clearly relevant, and must be produced.

In the same manner, income or benefits to the Individual Defendants from any third party related to medical marijuana is also relevant.

Sincerely,



William R. Restis, Esq.

THE RESTIS LAW FIRM, P.C.
william@restislaw.com

Cc: Jeffrey R. Krinsk, Esq.
Matthew Dart, Esq.

