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Superior Court of California,  
County of San Diego  
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Attorneys for Razuki Investments, LLC, and Salam Razuki

Clerk of the Superior Court  
By A. Anzalone ,Deputy Clerk

7  
8 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
FOR THE COUNTY OF SAN DIEGO - CENTRAL

9 SAN DIEGO PATIENTS COOPERATIVE )  
10 CORPORATION, INC., et. al. )

11 Plaintiffs, )

12 vs. )

13 RAZUKI INVESTMENTS, LLC, et. al., )

14 Defendants. )  
15 )  
16 )

Case No.: 37-2017-00020661-CU-CO-CTL

**OPPOSITION TO MOTION TO COMPEL  
FURTHER REPSONSES TO POST-  
JUDGMENT DOCUMENT REQUESTS**

DATE: July 19, 2024  
TIME: 9:00 a.m.  
DEPT: 67  
JUDGE: Hon. Michael T. Smyth

ATTACHED: Jaffe Declaration

17 Defendant Razuki Investments, LLC (“Defendant” or “Razuki Investments”) submits its  
18 Opposition To Motion To Compel Further Responses To Post-Judgment Document Requests as  
19 follows:

20 **I. Preliminary Statement**

21 Plaintiffs San Diego Patients Cooperative Corporation, Inc. (“San Diego Patients”) and  
22 Bradford Harcourt (“Harcourt”)(collectively “Plaintiffs”) brought claims against Defendants  
23 Razuki Investments, LLC and Salam Razuki. Plaintiffs lost all claims against Salam Razuki, and  
24 only San Diego Patients obtain a jury verdict against only Razuki Investments on some of its  
25 claims. The judgment based upon the jury verdict is on appeal.

26 Without limitation, Harcourt improperly seeks documents since 2016, will not  
27 acknowledge the application of a protective order, and the requests improperly invade the  
28 privacy of third parties (including parties for which Plaintiffs sued and lost).

1           **II.     The Improper Requests**

2           Request For Production No. 1: All articles of incorporation or organization, partnership  
3 and/or joint venture agreements, charters, bylaws, corporate minute books, and other Documents  
4 Relating To the formation of any business entity in which You have owned an interest, either directly  
5 or indirectly, at any time since October 17, 2016.

6           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
7 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
8 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
9 which are not to aid in enforcement of the money judgment in violation of CCP section  
10 708.030(a) by seeking “All articles of incorporation or organization, partnership and/or joint venture  
11 agreements, charters, bylaws, corporate minute books, and other Documents Relating To the  
12 formation of any business entity in which You have owned an interest, either directly or indirectly”.  
13 The request further improperly seeks to invade the privacy of non-judgment debtor third parties  
14 for which Plaintiffs failed to obtain a judgment against. A protective order is needed if any  
15 documents are to be produced.

16           Request For Production No. 2: Documents identifying all shareholders, directors, officers,  
17 partners, members, managers, or other owners or operators of any business entity in which You have  
18 owned an interest, either directly or indirectly, at any time since October 17, 2016.

19           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
20 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
21 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
22 which are not to aid in enforcement of the money judgment in violation of CCP section  
23 708.030(a) by seeking “Documents identifying all shareholders, directors, officers, partners,  
24 members, managers, or other owners or operators of any business entity in which You have owned  
25 an interest, either directly or indirectly”. The request further improperly seeks to invade the  
26 privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
27 against. A protective order is needed if any documents are to be produced.

28           Request For Production No. 3: All Documents Relating To all corporate entities or businesses  
identified in Your response to Interrogatory No. 1, served concurrently herewith.

          RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
CCP section 708.030(a). The request was also properly objected to and thus seeks documents

1 which are not to aid in enforcement of the money judgment in violation of CCP section  
2 708.030(a) by seeking “All Documents Relating To all corporate entities or businesses”. The  
3 request further improperly seeks to invade the privacy of non-judgment debtor third parties for  
4 which Plaintiffs failed to obtain a judgment against. A protective order is needed if any  
5 documents are to be produced.

6 Request For Production No. 4: All Documents identified in Your response to Interrogatory  
7 No. 5, served concurrently herewith.

8 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
9 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
10 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
11 which are not to aid in enforcement of the money judgment in violation of CCP section  
12 708.030(a) by seeking the documents in the interrogatory. The request further improperly seeks  
13 to invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a  
14 judgment against. A protective order is needed if any documents are to be produced.

15 Request For Production No. 5: All Documents identified in Your response to Interrogatory  
16 No. 7, served concurrently herewith.

17 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
18 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
19 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
20 which are not to aid in enforcement of the money judgment in violation of CCP section  
21 708.030(a) by seeking the documents in the interrogatory. The request further improperly seeks  
22 to invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a  
23 judgment against. A protective order is needed if any documents are to be produced.

24 Request For Production No. 6: All non-privileged Documents Relating To all legal actions  
25 identified in Your response to Interrogatory No. 8, served concurrently herewith.

26 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
27 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
28 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
which are not to aid in enforcement of the money judgment in violation of CCP section  
708.030(a) by seeking “All Documents Relating To all legal actions”. The request further  
improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs

1 failed to obtain a judgment against. A protective order is needed if any documents are to be  
2 produced.

3 Request For Production No. 7: All Documents Relating To all debts and liabilities identified  
4 in Your response to Interrogatory No. 9, served concurrently herewith.

5 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
6 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
7 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
8 which are not to aid in enforcement of the money judgment in violation of CCP section  
9 708.030(a) by seeking “All Documents Relating To all debts and liabilities”. The request further  
10 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
11 failed to obtain a judgment against. A protective order is needed if any documents are to be  
12 produced.

13 Request For Production No. 8: All Documents Relating To all accounts held with any bank,  
14 brokerage firm, investment firm, or other financial institution identified in Your response to  
15 Interrogatory No. 10, served concurrently herewith.

16 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
17 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
18 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
19 which are not to aid in enforcement of the money judgment in violation of CCP section  
20 708.030(a) by seeking “All Documents Relating To all accounts held with any bank, brokerage  
21 firm, investment firm, or other financial institution”. The request further improperly seeks to  
22 invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a  
23 judgment against. A protective order is needed if any documents are to be produced.

24 Request For Production No. 9: All Documents Relating To all vehicles, aircraft, boats, or  
25 other water vessels identified in Your response to Interrogatory No. 11, served concurrently  
26 herewith.

27 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
28 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
which are not to aid in enforcement of the money judgment in violation of CCP section  
708.030(a) by seeking “All Documents Relating To all vehicles, aircraft, boats, or other water  
vessels”. The request further improperly seeks to invade the privacy of non-judgment debtor

1 third parties for which Plaintiffs failed to obtain a judgment against. A protective order is  
2 needed if any documents are to be produced.

3 Request For Production No. 10: All Documents Relating To all tangible property identified in  
4 Your response to Interrogatory No. 12, served concurrently herewith.

5 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
6 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
7 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
8 which are not to aid in enforcement of the money judgment in violation of CCP section  
9 708.030(a) by seeking “All Documents Relating To all tangible property”. The request further  
10 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
11 failed to obtain a judgment against. A protective order is needed if any documents are to be  
12 produced.

13 Request For Production No. 11: All Documents Relating To all intangible property identified  
14 in Your response to Interrogatory No. 13, served concurrently herewith.

15 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
16 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
17 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
18 which are not to aid in enforcement of the money judgment in violation of CCP section  
19 708.030(a) by seeking “All Documents Relating To all intangible property”. The request further  
20 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
21 failed to obtain a judgment against. A protective order is needed if any documents are to be  
22 produced.

23 Request For Production No. 12: All Documents Relating To all insurance policies identified  
24 in Your response to Interrogatory No. 16, served concurrently herewith.

25 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
26 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
27 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
28 which are not to aid in enforcement of the money judgment in violation of CCP section  
708.030(a) by seeking “All Documents Relating To all insurance policies”. The request further  
improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs

1 failed to obtain a judgment against. A protective order is needed if any documents are to be  
2 produced.

3 Request For Production No. 13: All Documents Relating To all safe deposit boxes identified  
4 in Your response to Interrogatory No. 17, served concurrently herewith.

5 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
6 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
7 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
8 which are not to aid in enforcement of the money judgment in violation of CCP section  
9 708.030(a) by seeking “All Documents Relating To all safe deposit boxes”. The request further  
10 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
11 failed to obtain a judgment against. A protective order is needed if any documents are to be  
12 produced.

13 Request For Production No. 14: All Documents Relating To all third parties identified in  
14 Your response to Interrogatory No. 19, served concurrently herewith, including, without limitation,  
15 all Documents Relating To all Communications with all such third parties.

16 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
17 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
18 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
19 which are not to aid in enforcement of the money judgment in violation of CCP section  
20 708.030(a) by seeking “All Documents Relating To all third parties”. The request further  
21 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
22 failed to obtain a judgment against. A protective order is needed if any documents are to be  
23 produced.

24 Request For Production No. 15: All Documents Relating To all transferees identified in Your  
25 response to Interrogatory No. 20, served concurrently herewith, including, without limitation, all  
26 Documents Relating To all Communications with all such transferees.

27 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
28 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
which are not to aid in enforcement of the money judgment in violation of CCP section  
708.030(a) by seeking “All Documents Relating To all transferees”. The request further  
improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs

1 failed to obtain a judgment against. A protective order is needed if any documents are to be  
2 produced.

3 Request For Production No. 16: All Documents Relating To all state and federal income tax  
4 returns, and all related forms and schedules (including all amended returns, forms, and schedules)  
5 filed by Razuki Investments, LLC at any time since October 17, 2016.

6 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
7 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
8 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
9 which are not to aid in enforcement of the money judgment in violation of CCP section  
10 708.030(a) by seeking “All Documents Relating To all state and federal income tax returns, and all  
11 related forms and schedules (including all amended returns, forms, and schedules)”. The request  
12 further improperly seeks to invade the privacy of non-judgment debtor third parties for which  
13 Plaintiffs failed to obtain a judgment against. A protective order is needed if any documents are  
14 to be produced.

15 Request For Production No. 17: All Documents Relating To all financial statements, balance  
16 sheets, income statements, cash flow statements, profit and loss statements, and loan applications  
17 prepared or submitted by You or on Your behalf at any time since October 17, 2016.

18 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
19 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
20 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
21 which are not to aid in enforcement of the money judgment in violation of CCP section  
22 708.030(a) by seeking “All Documents Relating To all financial statements, balance sheets, income  
23 statements, cash flow statements, profit and loss statements, and loan applications prepared or  
24 submitted by You or on Your behalf”. The request further improperly seeks to invade the privacy  
25 of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment against. A  
26 protective order is needed if any documents are to be produced.

27 Request For Production No. 18: Documents sufficient to identify all of Your affiliates,  
28 subsidiaries, parent companies, or any other company that has or claims an interest in the Razuki  
Investments, LLC, including the name, address or location, and state or country of incorporation or  
organization of any such entity, and the nature of Your affiliation or corporate or other organizational  
relationship with any such entity.

RESPONSE: request was properly objected to as it seeks documents without any date  
limitation, and thus seeks documents which are not to aid in enforcement of the money judgment

1 in violation of CCP section 708.030(a). The request was also properly objected to and thus seeks  
2 documents which are not to aid in enforcement of the money judgment in violation of CCP  
3 section 708.030(a) by seeking “Documents sufficient to identify all of Your affiliates, subsidiaries,  
4 parent companies, or any other company that has or claims an interest in the Razuki Investments,  
5 LLC, including the name, address or location, and state or country of incorporation or organization of  
6 any such entity, and the nature of Your affiliation or corporate or other organizational relationship  
7 with any such entity.”. The request further improperly seeks to invade the privacy of non-  
8 judgment debtor third parties for which Plaintiffs failed to obtain a judgment against. A  
9 protective order is needed if any documents are to be produced.

10 Request For Production No. 19: All Documents Relating To any corporation, subsidiary,  
11 limited liability company, trust, partnership, or other business entity of any kind or nature in which  
12 You currently own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or  
13 in which You owned, held, or claimed any type of interest in, directly or indirectly, in whole or in  
14 part, at any time since October 17, 2016.

15 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
16 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
17 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
18 which are not to aid in enforcement of the money judgment in violation of CCP section  
19 708.030(a) by seeking “All Documents Relating To any corporation, subsidiary, limited liability  
20 company, trust, partnership, or other business entity of any kind or nature in which You currently  
21 own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or in which You  
22 owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part”. The  
23 request further improperly seeks to invade the privacy of non-judgment debtor third parties for  
24 which Plaintiffs failed to obtain a judgment against. A protective order is needed if any  
25 documents are to be produced.

26 Request For Production No. 20: If You claim that any of Your Revenue, Income, or Assets  
27 are exempt from collection, all Documents evidencing the basis for such exemption.

28 RESPONSE: The request was properly objected to as it is clearly compound and seeks a  
legal conclusion and thus seeks documents which are not to aid in enforcement of the money  
judgment in violation of CCP section 708.030(a). The request further improperly seeks to invade



1 the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
2 against. A protective order is needed if any documents are to be produced.

3 Request For Production No. 21: All Documents Relating To any and all debts or liabilities  
4 owed to You by any third party, including, but not limited to, all claims, causes of action, lawsuits,  
5 judgments, or liens You now have or had at any time since October 17, 2016.

6 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
7 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
8 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
9 which are not to aid in enforcement of the money judgment in violation of CCP section  
10 708.030(a) by seeking “All Documents Relating To any and all debts or liabilities owed to You by  
11 any third party, including, but not limited to, all claims, causes of action, lawsuits, judgments, or  
12 liens”. The request further improperly seeks to invade the privacy of non-judgment debtor third  
13 parties for which Plaintiffs failed to obtain a judgment against. A protective order is needed if  
14 any documents are to be produced.

15 Request For Production No. 22: All Documents Relating To or evidencing any third party’s  
16 possession, ownership, or control of any of Your Assets, in whole or in part.

17 RESPONSE: The request was properly objected to as it is clearly compound and seeks a  
18 legal conclusion and thus seeks documents which are not to aid in enforcement of the money  
19 judgment in violation of CCP section 708.030(a). The request further improperly seeks to invade  
20 the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
21 against. A protective order is needed if any documents are to be produced.

22 Request For Production No. 23: All Documents Relating To or evidencing any transaction in  
23 which You transferred any interest in any of Your assets over the value of \$10,000.00, in whole or in  
24 part, to any transferee at any time since October 17, 2016.

25 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
26 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
27 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
28 which are not to aid in enforcement of the money judgment in violation of CCP section  
708.030(a) by seeking “All Documents Relating To or evidencing any transaction in which You  
transferred any interest in any of Your assets over the value of \$10,000.00, in whole or in part, to any  
transferee”. The request further improperly seeks to invade the privacy of non-judgment debtor

1 third parties for which Plaintiffs failed to obtain a judgment against. A protective order is  
2 needed if any documents are to be produced.

3 Request For Production No. 24: All Documents You provided to any transferee in connection  
4 with any due diligence he, she, or it conducted before engaging in any transfer of any interest in any  
5 of Your assets over the value of \$10,000.00, in whole or in part, to any transferee at any time since  
6 October 17, 2016.

7 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
8 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
9 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
10 which are not to aid in enforcement of the money judgment in violation of CCP section  
11 708.030(a) by seeking “All Documents You provided to any transferee in connection with any due  
12 diligence he, she, or it conducted before engaging in any transfer of any interest in any of Your assets  
13 over the value of \$10,000.00, in whole or in part, to any transferee”. The request further improperly  
14 seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to  
15 obtain a judgment against. A protective order is needed if any documents are to be produced.

### 16 III. No Sanctions

17 No sanctions are appropriate given the proper objections as set forth above. No sanctions  
18 should be ordered as against Razuki Investments’ counsel as it was Razuki Investments’ decision  
19 to object to the requests and counsel was required to follow that decision. The amount of the  
20 sanctions is also excessive and without support for the hourly rate requested and the work  
21 involved (and by which attorneys). Counsel for Razuki Investments met and conferred with  
22 counsel for Plaintiffs and they refused to alter the requests other than a date of June 17, 2017.

### 23 IV. Conclusion

24 Razuki Investments requests the Court deny the motion to compel.

25 Dated: July 17, 2024

LAW OFFICES OF DOUGLAS JAFFE

/s/ Douglas Jaffe

Douglas Jaffe

1 DECLARATION OF DOUGLAS JAFFE

2 DOUGLAS JAFFE declares:

3 1. I am the attorney for Razuki Investments, LLC, and Salam Razuki. As such, I  
4 have personal knowledge of the facts set forth herein and if called to testify, I could and would  
5 competently testify thereto.

6 2. Plaintiffs San Diego Patients Cooperative Corporation, Inc. (“San Diego  
7 Patients”) and Bradford Harcourt (“Harcourt”)(collectively “Plaintiffs”) brought claims against  
8 Defendants Razuki Investments, LLC and Salam Razuki. Plaintiffs lost all claims against Salam  
9 Razuki, and only San Diego Patients obtain a jury verdict against only Razuki Investments on  
10 some of its claims. The judgment based upon the jury verdict is on appeal.

11 3. Without limitation, Harcourt improperly seeks documents since 2016, will not  
12 acknowledge the application of a protective order, and the requests improperly invade the  
13 privacy of third parties (including parties for which Plaintiffs sued and lost).

14 4. Request For Production No. 1: All articles of incorporation or organization, partnership  
15 and/or joint venture agreements, charters, bylaws, corporate minute books, and other  
16 Documents Relating To the formation of any business entity in which You have owned  
17 an interest, either directly or indirectly, at any time since October 17, 2016.

18 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
19 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
20 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
21 which are not to aid in enforcement of the money judgment in violation of CCP section  
22 708.030(a) by seeking “All articles of incorporation or organization, partnership and/or joint venture  
23 agreements, charters, bylaws, corporate minute books, and other Documents Relating To the  
24 formation of any business entity in which You have owned an interest, either directly or indirectly”.  
25 The request further improperly seeks to invade the privacy of non-judgment debtor third parties  
26 for which Plaintiffs failed to obtain a judgment against. A protective order is needed if any  
27 documents are to be produced.

28 5. Request For Production No. 2: Documents identifying all shareholders, directors,  
officers, partners, members, managers, or other owners or operators of any business  
entity in which You have owned an interest, either directly or indirectly, at any time since  
October 17, 2016.

1           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
2 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
3 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
4 which are not to aid in enforcement of the money judgment in violation of CCP section  
5 708.030(a) by seeking “Documents identifying all shareholders, directors, officers, partners,  
6 members, managers, or other owners or operators of any business entity in which You have owned  
7 an interest, either directly or indirectly”. The request further improperly seeks to invade the  
8 privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
9 against. A protective order is needed if any documents are to be produced.

10           6. Request For Production No. 3: All Documents Relating To all corporate entities or  
11           businesses identified in Your response to Interrogatory No. 1, served concurrently  
12           herewith.

13           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
14 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
15 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
16 which are not to aid in enforcement of the money judgment in violation of CCP section  
17 708.030(a) by seeking “All Documents Relating To all corporate entities or businesses”. The  
18 request further improperly seeks to invade the privacy of non-judgment debtor third parties for  
19 which Plaintiffs failed to obtain a judgment against. A protective order is needed if any  
20 documents are to be produced.

21           7. Request For Production No. 4: All Documents identified in Your response to  
22           Interrogatory No. 5, served concurrently herewith.

23           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
24 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
25 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
26 which are not to aid in enforcement of the money judgment in violation of CCP section  
27 708.030(a) by seeking the documents in the interrogatory. The request further improperly seeks  
28 to invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a  
judgment against. A protective order is needed if any documents are to be produced.

          8. Request For Production No. 5: All Documents identified in Your response to  
Interrogatory No. 7, served concurrently herewith.

1           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
2 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
3 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
4 which are not to aid in enforcement of the money judgment in violation of CCP section  
5 708.030(a) by seeking the documents in the interrogatory. The request further improperly seeks  
6 to invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a  
7 judgment against. A protective order is needed if any documents are to be produced.

8           9. Request For Production No. 6: All non-privileged Documents Relating To all legal  
9 actions identified in Your response to Interrogatory No. 8, served concurrently herewith.

10           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
11 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
12 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
13 which are not to aid in enforcement of the money judgment in violation of CCP section  
14 708.030(a) by seeking “All Documents Relating To all legal actions”. The request further  
15 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
16 failed to obtain a judgment against. A protective order is needed if any documents are to be  
17 produced.

18           10. Request For Production No. 7: All Documents Relating To all debts and liabilities  
19 identified in Your response to Interrogatory No. 9, served concurrently herewith.

20           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
21 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
22 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
23 which are not to aid in enforcement of the money judgment in violation of CCP section  
24 708.030(a) by seeking “All Documents Relating To all debts and liabilities”. The request further  
25 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
26 failed to obtain a judgment against. A protective order is needed if any documents are to be  
27 produced.

28           11. For Production No. 8: All Documents Relating To all accounts held with any bank,  
brokerage firm, investment firm, or other financial institution identified in Your response  
to Interrogatory No. 10, served concurrently herewith.

1           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
2 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
3 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
4 which are not to aid in enforcement of the money judgment in violation of CCP section  
5 708.030(a) by seeking “All Documents Relating To all accounts held with any bank, brokerage  
6 firm, investment firm, or other financial institution”. The request further improperly seeks to  
7 invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a  
8 judgment against. A protective order is needed if any documents are to be produced.

9           12. Request For Production No. 9: All Documents Relating To all vehicles, aircraft, boats, or  
10 other water vessels identified in Your response to Interrogatory No. 11, served  
11 concurrently herewith.

12           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
13 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
14 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
15 which are not to aid in enforcement of the money judgment in violation of CCP section  
16 708.030(a) by seeking “All Documents Relating To all vehicles, aircraft, boats, or other water  
17 vessels”. The request further improperly seeks to invade the privacy of non-judgment debtor  
18 third parties for which Plaintiffs failed to obtain a judgment against. A protective order is  
19 needed if any documents are to be produced.

19           13. Request For Production No. 10: All Documents Relating To all tangible property  
20 identified in Your response to Interrogatory No. 12, served concurrently herewith.

21           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
22 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
23 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
24 which are not to aid in enforcement of the money judgment in violation of CCP section  
25 708.030(a) by seeking “All Documents Relating To all tangible property”. The request further  
26 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
27 failed to obtain a judgment against. A protective order is needed if any documents are to be  
28 produced.

14. Request For Production No. 11: All Documents Relating To all intangible property  
identified in Your response to Interrogatory No. 13, served concurrently herewith.

1           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
2 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
3 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
4 which are not to aid in enforcement of the money judgment in violation of CCP section  
5 708.030(a) by seeking “All Documents Relating To all intangible property”. The request further  
6 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
7 failed to obtain a judgment against. A protective order is needed if any documents are to be  
8 produced.

9           15. Request For Production No. 12: All Documents Relating To all insurance policies  
10 identified in Your response to Interrogatory No. 16, served concurrently herewith.

11           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
12 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
13 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
14 which are not to aid in enforcement of the money judgment in violation of CCP section  
15 708.030(a) by seeking “All Documents Relating To all insurance policies”. The request further  
16 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
17 failed to obtain a judgment against. A protective order is needed if any documents are to be  
18 produced.

19           16. Request For Production No. 13: All Documents Relating To all safe deposit boxes  
20 identified in Your response to Interrogatory No. 17, served concurrently herewith.

21           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
22 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
23 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
24 which are not to aid in enforcement of the money judgment in violation of CCP section  
25 708.030(a) by seeking “All Documents Relating To all safe deposit boxes”. The request further  
26 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
27 failed to obtain a judgment against. A protective order is needed if any documents are to be  
28 produced.

          17. Request For Production No. 14: All Documents Relating To all third parties identified in  
Your response to Interrogatory No. 19, served concurrently herewith, including, without  
limitation, all Documents Relating To all Communications with all such third parties.

1           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
2 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
3 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
4 which are not to aid in enforcement of the money judgment in violation of CCP section  
5 708.030(a) by seeking “All Documents Relating To all third parties”. The request further  
6 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
7 failed to obtain a judgment against. A protective order is needed if any documents are to be  
8 produced.

9           18. Request For Production No. 15: All Documents Relating To all transferees identified in  
10           Your response to Interrogatory No. 20, served concurrently herewith, including, without  
11           limitation, all Documents Relating To all Communications with all such transferees.

12           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
13 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
14 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
15 which are not to aid in enforcement of the money judgment in violation of CCP section  
16 708.030(a) by seeking “All Documents Relating To all transferees”. The request further  
17 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
18 failed to obtain a judgment against. A protective order is needed if any documents are to be  
19 produced.

20           19. Request For Production No. 16: All Documents Relating To all state and federal income  
21           tax returns, and all related forms and schedules (including all amended returns, forms,  
22           and schedules) filed by Razuki Investments, LLC at any time since October 17, 2016.

23           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
24 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
25 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
26 which are not to aid in enforcement of the money judgment in violation of CCP section  
27 708.030(a) by seeking “All Documents Relating To all state and federal income tax returns, and all  
28 related forms and schedules (including all amended returns, forms, and schedules)”. The request  
further improperly seeks to invade the privacy of non-judgment debtor third parties for which  
Plaintiffs failed to obtain a judgment against. A protective order is needed if any documents are  
to be produced.



1 20. Request For Production No. 17: All Documents Relating To all financial statements,  
2 balance sheets, income statements, cash flow statements, profit and loss statements, and  
3 loan applications prepared or submitted by You or on Your behalf at any time since  
4 October 17, 2016.

5 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
6 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
7 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
8 which are not to aid in enforcement of the money judgment in violation of CCP section  
9 708.030(a) by seeking “All Documents Relating To all financial statements, balance sheets, income  
10 statements, cash flow statements, profit and loss statements, and loan applications prepared or  
11 submitted by You or on Your behalf”. The request further improperly seeks to invade the privacy  
12 of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment against. A  
13 protective order is needed if any documents are to be produced.

14 21. Request For Production No. 18: Documents sufficient to identify all of Your affiliates,  
15 subsidiaries, parent companies, or any other company that has or claims an interest in the  
16 Razuki Investments, LLC, including the name, address or location, and state or country  
17 of incorporation or organization of any such entity, and the nature of Your affiliation or  
18 corporate or other organizational relationship with any such entity.

19 RESPONSE: request was properly objected to as it seeks documents without any date  
20 limitation, and thus seeks documents which are not to aid in enforcement of the money judgment  
21 in violation of CCP section 708.030(a). The request was also properly objected to and thus seeks  
22 documents which are not to aid in enforcement of the money judgment in violation of CCP  
23 section 708.030(a) by seeking “Documents sufficient to identify all of Your affiliates, subsidiaries,  
24 parent companies, or any other company that has or claims an interest in the Razuki Investments,  
25 LLC, including the name, address or location, and state or country of incorporation or organization of  
26 any such entity, and the nature of Your affiliation or corporate or other organizational relationship  
27 with any such entity.”. The request further improperly seeks to invade the privacy of non-  
28 judgment debtor third parties for which Plaintiffs failed to obtain a judgment against. A  
protective order is needed if any documents are to be produced.

29 22. Request For Production No. 19: All Documents Relating To any corporation, subsidiary,  
30 limited liability company, trust, partnership, or other business entity of any kind or nature  
31 in which You currently own, hold, or claim any type of interest in, directly or indirectly,  
32 in whole or in part, or in which You owned, held, or claimed any type of interest in,  
33 directly or indirectly, in whole or in part, at any time since October 17, 2016.

1           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
2 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
3 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
4 which are not to aid in enforcement of the money judgment in violation of CCP section  
5 708.030(a) by seeking “All Documents Relating To any corporation, subsidiary, limited liability  
6 company, trust, partnership, or other business entity of any kind or nature in which You currently  
7 own, hold, or claim any type of interest in, directly or indirectly, in whole or in part, or in which You  
8 owned, held, or claimed any type of interest in, directly or indirectly, in whole or in part”. The  
9 request further improperly seeks to invade the privacy of non-judgment debtor third parties for  
10 which Plaintiffs failed to obtain a judgment against. A protective order is needed if any  
11 documents are to be produced.

12           23. Request For Production No. 20: If You claim that any of Your Revenue, Income, or  
13           Assets are exempt from collection, all Documents evidencing the basis for such  
14           exemption.

15           RESPONSE: The request was properly objected to as it is clearly compound and seeks a  
16 legal conclusion and thus seeks documents which are not to aid in enforcement of the money  
17 judgment in violation of CCP section 708.030(a). The request further improperly seeks to invade  
18 the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
19 against. A protective order is needed if any documents are to be produced.

20           24. Request For Production No. 21: All Documents Relating To any and all debts or  
21           liabilities owed to You by any third party, including, but not limited to, all claims, causes  
22           of action, lawsuits, judgments, or liens You now have or had at any time since October  
23           17, 2016.

24           RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
25 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
26 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
27 which are not to aid in enforcement of the money judgment in violation of CCP section  
28 708.030(a) by seeking “All Documents Relating To any and all debts or liabilities owed to You by  
any third party, including, but not limited to, all claims, causes of action, lawsuits, judgments, or  
liens”. The request further improperly seeks to invade the privacy of non-judgment debtor third

1 parties for which Plaintiffs failed to obtain a judgment against. A protective order is needed if  
2 any documents are to be produced.

3 25. Request For Production No. 22: All Documents Relating To or evidencing any third  
4 party's possession, ownership, or control of any of Your Assets, in whole or in part.

5 RESPONSE: The request was properly objected to as it is clearly compound and seeks a  
6 legal conclusion and thus seeks documents which are not to aid in enforcement of the money  
7 judgment in violation of CCP section 708.030(a). The request further improperly seeks to invade  
8 the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
9 against. A protective order is needed if any documents are to be produced.

10 26. Request For Production No. 23: All Documents Relating To or evidencing any  
11 transaction in which You transferred any interest in any of Your assets over the value of  
12 \$10,000.00, in whole or in part, to any transferee at any time since October 17, 2016.

13 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
14 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
15 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
16 which are not to aid in enforcement of the money judgment in violation of CCP section  
17 708.030(a) by seeking "All Documents Relating To or evidencing any transaction in which You  
18 transferred any interest in any of Your assets over the value of \$10,000.00, in whole or in part, to any  
19 transferee". The request further improperly seeks to invade the privacy of non-judgment debtor  
20 third parties for which Plaintiffs failed to obtain a judgment against. A protective order is  
21 needed if any documents are to be produced.

22 27. Request For Production No. 24: All Documents You provided to any transferee in  
23 connection with any due diligence he, she, or it conducted before engaging in any transfer  
24 of any interest in any of Your assets over the value of \$10,000.00, in whole or in part, to  
25 any transferee at any time since October 17, 2016.

26 RESPONSE: The request was properly objected to as it seeks documents since 2016, and  
27 thus seeks documents which are not to aid in enforcement of the money judgment in violation of  
28 CCP section 708.030(a). The request was also properly objected to and thus seeks documents  
29 which are not to aid in enforcement of the money judgment in violation of CCP section  
30 708.030(a) by seeking "All Documents You provided to any transferee in connection with any due  
31 diligence he, she, or it conducted before engaging in any transfer of any interest in any of Your assets  
32 over the value of \$10,000.00, in whole or in part, to any transferee". The request further improperly

1 seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to  
2 obtain a judgment against. A protective order is needed if any documents are to be produced.

3 28. No sanctions are appropriate given the proper objections as set forth above. No  
4 sanctions should be ordered as against Razuki Investments' counsel as it was Razuki  
5 Investments' decision to object to the requests and counsel was required to follow that decision.  
6 The amount of the sanctions is also excessive and without support for the hourly rate requested  
7 and the work involved (and by which attorneys). I met and conferred with counsel for Plaintiffs  
8 and they refused to alter the requests other than a date of June 17, 2017. See attached.

9  
10 I declare under penalty of perjury under the laws of the State of California that the  
11 foregoing is true and correct. Executed on July 17, 2024 in San Diego, California.

12  
13 /s/ Douglas Jaffe

14 DOUGLAS JAFFE  
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Douglas Jaffe &lt;dougjaffelaw@gmail.com&gt;

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**Re: Patients Cooperative/Razuki**

1 message

**Douglas Jaffe** <dougjaffelaw@gmail.com>

Thu, Apr 4, 2024 at 2:15 PM

To: "Charles C. Cavanagh" &lt;ccavanagh@messner.com&gt;

Cc: Allan Claybon &lt;aclaybon@messner.com&gt;, Mark Collier &lt;mcollier@messner.com&gt;

You can engage in revisionist history to which we dispute (especially given the admissions in your email), but it still exists that you will not agree to any date for the discovery requests other than 6/7/17.

On Thu, Apr 4, 2024 at 1:55 PM Charles C. Cavanagh <ccavanagh@messner.com> wrote:

False!

But, thank you for admitting that you told me that you were never going to agree.

**CHARLES C. CAVANAGH**

Partner

**Messner Reeves LLP****D:** 303.454.2144 **O:** 303.623.1800 **E:** ccavanagh@messner.com

1550 Wewatta Street, Suite 710 Denver, CO 80202

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**From:** Douglas Jaffe <dougjaffelaw@gmail.com>**Sent:** Thursday, April 4, 2024 2:14 PM**To:** Charles C. Cavanagh <ccavanagh@messner.com>**Cc:** Allan Claybon <aclaybon@messner.com>; Mark Collier <mcollier@messner.com>**Subject:** Re: Patients Cooperative/Razuki**[ EXTERNAL EMAIL ]**

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I indicated that it appeared we were never going to agree during a meet and confer given

your insistence that the documents and facts to be produced should be from June 7, 2017 (and, again, you initially requested documents and facts from 2016). You have admitted that Mr. Harcourt will not agree to alter the date in the discovery requests to any date prior to the date of the filing of the Complaint

On Thu, Apr 4, 2024 at 12:50 PM Douglas Jaffe <dougjaffelaw@gmail.com> wrote:

Thank you for admitting, as you admitted during our telephone conversation, that Mr. Harcourt will not agree to alter the date in the discovery requests to any date prior to the date of the filing of the Complaint. Your email further demonstrates that discovery is for a fraudulent conveyance claim.

On Thu, Apr 4, 2024 at 11:50 AM Charles C. Cavanagh <ccavanagh@messner.com> wrote:

Doug:

Your email is accurate insofar as we did speak by telephone on April 2 regarding my meet-and-confer letter of April 1. In virtually every other respect, your email misrepresents our conversation. Specifically, I did not state that Mr. Harcourt will not agree to any changes to the discovery requests other than to change the date in the requests from October 17, 2016 to the date the Complaint was filed, I did not state that I did not want to receive any citations to case authorities that you might want to provide (notably, your email is devoid of any such citations), and I agreed that any information and documents that Razuki Investments provided in response to Mr. Harcourt's discovery requests could be subject to the Stipulation and Protective Order previously agreed to by the parties. Nevertheless, you refused throughout our call to offer any means of resolving the boilerplate objections asserted by Razuki Investments. Instead, at the end of our call, you simply stated, "We're never going to agree."

A more complete – and accurate – recitation of our telephone conversation follows:

During our call of April 2, I told you that I had received Judgment Debtor's responses to Judgment Creditor's discovery requests, that I had seen that all of Judgment Debtor's responses consisted solely of objections, and that I did not believe that the objections were well taken because Judgment Creditor is entitled to conduct discovery. Therefore, I told you, I was calling to see if we could resolve Judgment Debtor's objections, such that it would provide substantive responses to the discovery requests.

You responded that your first concern with the discovery requests is that many of them request information dating back to October 17, 2016, i.e. several months before the Complaint in this action was filed. I responded that I believe it is appropriate to aiding in the collection of the Judgment to request information pre-dating by a brief period the filing of the Complaint, so Judgment Creditor may see not only what assets Judgment Debtor currently possesses but also other assets that Judgment Debtor has possessed, both during the pendency of the action and briefly before the filing of the Complaint. When you questioned how information relating to Judgment Debtor's assets prior to the filing of the Complaint could possibly be relevant to aiding Judgment Creditor in collecting on the Judgment, I responded that, if Judgment Debtor's discovery responses reveal that it does not currently possess assets sufficient to satisfy the Judgment but that it had previously possessed sufficient assets at a time when it was aware of its potential liability to Judgment Creditor, information relating to those prior assets would aid Judgment Creditor in collecting any shortfall through the assertion of claims against Judgment Debtor and others for fraudulent conveyance. When you expressed that you were not persuaded, I asked if Judgment Debtor would provide substantive responses to Judgment Creditor's discovery requests if Judgment Creditor agreed to limit the scope of the requests to information dating only from the filing of the Complaint. You responded that Judgment Debtor would not.

I then asked you what agreements we could reach in order to resolve Judgment Debtor's objections, such that it would provide substantive responses to Judgment Creditor's requests. You responded that you could cite to case law that would support your position regarding the limited nature of discovery requests to a judgment debtor. I told you that I would be happy to consider any case law that you wanted to cite to me but that, rather than continue to argue, I was more interested in trying to resolve Judgment Debtor's objections.

At that point, you responded that you had other concerns regarding the discovery requests, including that they infringe upon the privacy rights of Salam Razuki. Therefore, you asserted, any information and documents would have to be produced subject to a protective order. I responded that I do not agree that any of the discovery

requests improperly infringe upon Mr. Razuki's privacy because all of the discovery requests are directed to Judgment Debtor, not Mr. Razuki. Therefore, Mr. Razuki's interests are implicated, if at all, only indirectly and only to the extent that he is a member of Judgment Debtor. Nevertheless, I told you that, because I believe that the Stipulation and Protective Order previously agreed to in this action remains in full force and effect, Judgment Debtor would be free to employ the procedures thereunder for designating information and documents as "Confidential." I further told you that, if you have any doubt about the applicability of the prior Stipulation and Protective Order to the parties' post-judgment discovery, I would be happy either to stipulate that the prior Stipulation and Protective Order does apply or to amend the prior Stipulation and Protective Order.

At that point, you stated, "We're never going to agree." You reiterated the statement, saying that you object not only to the temporal scope of the discovery requests but to everything about their overbreadth. When I asked you if there is any agreement we could reach to resolve Judgment Debtor's objections such that it would provide substantive responses to the discovery requests, you again stated that we were never going to agree. I then informed you that, in light of that position, Judgment Debtor would proceed to make motions to compel further responses to the discovery requests.

Accordingly, we intend to proceed with filing appropriate motions to compel.

Best regards,  
Charles

**CHARLES C. CAVANAGH**

Partner

**Messner Reeves LLP**

**D:** 303.454.2144 **O:** 303.623.1800 **E:** ccavanagh@messner.com

1550 Wewatta Street, Suite 710 Denver, CO 80202

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**From:** Douglas Jaffe <dougjaffelaw@gmail.com>  
**Sent:** Wednesday, April 3, 2024 2:45 PM  
**To:** Charles C. Cavanagh <ccavanagh@messner.com>  
**Cc:** Allan Claybon <aclaybon@messner.com>; Mark Collier <mcollier@messner.com>  
**Subject:** Re: Patients Cooperative/Razuki

**[ EXTERNAL EMAIL ]**

---

This will confirm that we spoke by telephone yesterday regarding your letter. You indicated that Mr. Harcourt will not agree to any changes to the discovery requests other than maybe to change the date in the requests from October 17, 2016 to the date the Complaint was filed on June 7, 2017. Both are over 6 years ago. You indicated the need for that amount of time was for purposes of Mr. Harcourt possibly asserting fraudulent conveyance claims. As I indicated, that is an improper basis for the post-judgment discovery.

I tried to give you case authority during our call but you indicated you did not want it. I did mention that judgment creditors are entitled to limited discovery from the debtors in the form of interrogatories and demands for inspection of documents.

As we also discussed, Mr. Harcourt is improperly attempting discovery regarding the private financial information of Salam Razuki, who prevailed against Plaintiffs' claims at trial.

We also discussed that a protective order is necessary for any documents produced pursuant to the post-judgment discovery.

On Mon, Apr 1, 2024 at 4:07 PM Charles C. Cavanagh <ccavanagh@messner.com> wrote:

Doug:

Attached, please find a copy of my letter of today's date.

Best regards,

Charles

**CHARLES C. CAVANAGH**

Partner

**Messner Reeves LLP**

**D:** 303.454.2144 **O:** 303.623.1800 **E:** ccavanagh@messner.com

1550 Wewatta Street, Suite 710 Denver, CO 80202

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**From:** Douglas Jaffe <dougjaffelaw@gmail.com>

**Sent:** Wednesday, March 20, 2024 10:02 PM

**To:** Allan Claybon <aclaybon@messner.com>; Mark Collier <mcollier@messner.com>; Charles C. Cavanagh <ccavanagh@messner.com>; David Demergian <david@demergianlaw.com>

**Subject:** Re: Patients Cooperative/Razuki

**[ EXTERNAL EMAIL ]**

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See attached.

On Wed, Mar 20, 2024 at 8:29 PM Douglas Jaffe <dougjaffelaw@gmail.com> wrote:



See attached.

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Douglas Jaffe, Esq.  
501 West Broadway, Suite 800  
San Diego, CA 92101  
Telephone: (619) 400-4945  
Facsimile: (619) 400-4947

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