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

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

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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. )

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

11 Plaintiffs, )

**OPPOSITION TO MOTION TO COMPEL  
FURTHER REPSONSES TO POST-  
JUDGMENT INTERROGATORIES**

12 vs. )

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

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

14 Defendants. )

ATTACHED: Jaffe Declaration

15 )  
16 )  
17 Defendant Razuki Investments, LLC (“Defendant” or “Razuki Investments”) submits its  
18 Opposition To Motion To Compel Further Responses To Post-Judgment Interrogatories 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 information since 2016, will not  
27 acknowledge the application of a protective order, and the interrogatories improperly invade the  
28 privacy of third parties (including parties for which Plaintiffs sued and lost).

1                   **II.     The Improper Interrogatories**

2                   Interrogatory No. 1: State the name, address, and state of incorporation or organization of any  
3 corporate entity or other business in which Razuki Investments LLC has, either directly or indirectly,  
4 had any type of interest at any time since October 17, 2016.

5                   RESPONSE: The interrogatory was properly objected to as it seeks information since  
6 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
7 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
8 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
9 section 708.020(a) by seeking Razuki Investments to “State the name, address, and state of  
10 incorporation or organization of any corporate entity or other business in which Razuki Investments  
11 LLC has, either directly or indirectly, had any type of interest”. The request further improperly  
12 seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to  
13 obtain a judgment against. A protective order is needed if any information is to be produced.

14                   Interrogatory No. 2: Identify all real property in which Razuki Investments, LLC has, either  
15 directly or indirectly, had any type of interest at any time since October 17, 2016.

16                   RESPONSE: The interrogatory was properly objected to as it seeks information since  
17 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
18 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
19 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
20 section 708.020(a) by seeking Razuki Investments to “Identify all real property in which Razuki  
21 Investments, LLC has, either directly or indirectly, had any type of interest”. The request further  
22 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
23 failed to obtain a judgment against. A protective order is needed if any information is to be  
24 produced.

25                   Interrogatory No. 3: Describe all sources of income, revenue, or remuneration of any kind  
26 received by Razuki Investments, LLC at any time since October 17, 2016, including, without  
27 limitation, all sources of any payments for goods and services, interest income, operating income,  
28 payments on accounts receivables, commissions, agency fees, loan repayments, rents, royalties,  
license fees, dividends, distributions, payments relating to sales of assets, payments on contracts, or  
any other payment or remuneration received by Razuki Investments, LLC in connection with the  
operation of its business.

                    RESPONSE: The interrogatory was properly objected to as it seeks information since  
2016, and thus seeks information which is not to aid in enforcement of the money judgment in

1 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
2 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
3 section 708.020(a) by seeking Razuki Investments to “Describe all sources of income, revenue, or  
4 remuneration of any kind received by Razuki Investments, LLC”. The request further improperly  
5 seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to  
6 obtain a judgment against. A protective order is needed if any information is to be produced.

7  
8 Interrogatory No. 4: State the amount of all income declared by Razuki Investments, LLC on  
9 all state and federal income tax returns and all related forms and schedules (including all amended  
10 returns, forms, and schedules) filed at any time since October 17, 2016.

11 RESPONSE: The interrogatory was properly objected to as it seeks information since  
12 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
13 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
14 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
15 section 708.020(a) by seeking Razuki Investments to “State the amount of all income declared by  
16 Razuki Investments, LLC on all state and federal income tax returns and all related forms and  
17 schedules (including all amended returns, forms, and schedules)”. The request further improperly  
18 seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to  
19 obtain a judgment against. A protective order is needed if any information is to be produced.

20 Interrogatory No. 5: Identify all documents evidencing any income, revenue, or remuneration  
21 of any kind received by Razuki Investments, LLC from any source at any time since October 17,  
22 2016.

23 RESPONSE: The interrogatory was properly objected to as it seeks information since  
24 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
25 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
26 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
27 section 708.020(a) by seeking Razuki Investments to “Identify all documents evidencing any  
28 income, revenue, or remuneration of any kind received by Razuki Investments, LLC from any  
source”. 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 information is to be produced.

1 Interrogatory No. 6: Identify and describe all debts and liabilities owed by Razuki  
2 Investments, LLC at any time since October 17, 2016.

3 RESPONSE: The interrogatory was properly objected to as it seeks information since  
4 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
5 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
6 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
7 section 708.020(a) by seeking Razuki Investments to “Identify and describe all debts and liabilities  
8 owed by Razuki Investments, LLC”. The request further improperly seeks to invade the privacy  
9 of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment against. A  
10 protective order is needed if any information is to be produced.

11 Interrogatory No. 7: Identify all documents evidencing any debts and liabilities owed by  
12 Razuki Investments, LLC at any time since October 17, 2016.

13 RESPONSE: The interrogatory was properly objected to as it seeks information since  
14 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
15 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
16 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
17 section 708.020(a) by seeking Razuki Investments to “Identify all documents evidencing any debts  
18 and liabilities owed by Razuki Investments, LLC”. The request further improperly seeks to invade  
19 the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
20 against. A protective order is needed if any information is to be produced.

21 Interrogatory No. 8: Identify by jurisdiction and case number all legal actions in which  
22 Razuki Investments, LLC has been a party at any time since October 17, 2016.

23 RESPONSE: The interrogatory was properly objected to as it seeks information since  
24 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
25 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
26 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
27 section 708.020(a) by seeking Razuki Investments to “Identify by jurisdiction and case number all  
28 legal actions in which Razuki Investments, LLC has been a party”. 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 information is to be produced.

1 Interrogatory No. 9: Identify and describe all debts and liabilities presently owed to Razuki  
Investments, LLC by any person or entity.

2 RESPONSE: The interrogatory was properly objected to and thus seeks information  
3 which is not to aid in enforcement of the money judgment in violation of CCP section 708.020(a)  
4 by seeking Razuki Investments to “Identify and describe all debts and liabilities presently owed to  
5 Razuki Investments, LLC by any person or entity”. The request further improperly seeks to invade  
6 the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
7 against. A protective order is needed if any information is to be produced.

8 Interrogatory No. 10: Identify all banks, brokerage firms, investment firms, or other financial  
9 institutions for any account which Razuki Investments, LLC currently owns, holds, or claims an  
interest in, in whole or in part, or owned, held, or claimed an interest in, in whole or in part, at any  
10 time since October 17, 2016.

11 RESPONSE: The interrogatory was properly objected to as it seeks information since  
12 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
13 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
14 section 708.020(a) by seeking Razuki Investments to “Identify all banks, brokerage firms,  
15 investment firms, or other financial institutions for any account which Razuki Investments, LLC  
16 currently owns, holds, or claims an interest in, in whole or in part, or owned, held, or claimed an  
17 interest in, in whole or in part”. The request further improperly seeks to invade the privacy of  
18 non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment against. A  
19 protective order is needed if any information is to be produced.  
20

21 Interrogatory No. 11: Identify and describe all vehicles, aircraft, boats, or other water vessels  
that Razuki Investments, LLC currently owns, holds, or claims an interest in, directly or indirectly, in  
22 whole or in part, or owned, held, or claimed an interest in, directly or indirectly, in whole or in part,  
at any time since October 17, 2016.

23 RESPONSE: The interrogatory was properly objected to as it seeks information since  
24 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
25 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
26 section 708.020(a) by seeking Razuki Investments to “Identify and describe all vehicles, aircraft,  
27 boats, or other water vessels that Razuki Investments, LLC currently owns, holds, or claims an  
28 interest in, directly or indirectly, in whole or in part, or owned, held, or claimed an interest in,

1 directly or indirectly, in whole or in part”. The request further improperly seeks to invade the  
2 privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
3 against. A protective order is needed if any information is to be produced.

4 Interrogatory No. 12: Identify and describe any and all tangible property with a value over  
5 \$10,000.00 which Razuki Investments, LLC currently owns, holds, or claims an interest in, directly  
6 or indirectly, in whole or in part, or owned, held, or claimed an interest in, directly or indirectly, in  
7 whole or in part, at any time since October 17, 2016.

8 RESPONSE: The interrogatory was properly objected to as it seeks information since  
9 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
10 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
11 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
12 section 708.020(a) by seeking Razuki Investments to “Identify and describe any and all tangible  
13 property with a value over \$10,000.00 which Razuki Investments, LLC currently owns, holds, or  
14 claims an interest in, directly or indirectly, in whole or in part, or owned, held, or claimed an interest  
15 in, directly or indirectly”. The request further improperly seeks to invade the privacy of non-  
16 judgment debtor third parties for which Plaintiffs failed to obtain a judgment against. A  
17 protective order is needed if any information is to be produced.

18 Interrogatory No. 13: Identify and describe all intangible property with a value over  
19 \$10,000.00 which Razuki Investments, LLC currently owns, holds, or claims any type of interest in,  
20 directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly  
21 or indirectly.

22 RESPONSE: The interrogatory was properly objected to and thus seeks information  
23 which is not to aid in enforcement of the money judgment in violation of CCP section 708.020(a)  
24 by seeking Razuki Investments to “Identify and describe all intangible property with a value over  
25 \$10,000.00 which Razuki Investments, LLC currently owns, holds, or claims any type of interest in,  
26 directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly  
27 or indirectly.”. The request further improperly seeks to invade the privacy of non-judgment  
28 debtor third parties for which Plaintiffs failed to obtain a judgment against. A protective order is  
needed if any information is to be produced.

Interrogatory No. 14: Identify all persons who have been a member, manager, owner,  
employee, or agent of Razuki Investments, LLC at any time since October 17, 2016.

RESPONSE: The interrogatory was properly objected to as it seeks information since  
2016, and thus seeks information which is not to aid in enforcement of the money judgment in

1 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
2 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
3 section 708.020(a) by seeking Razuki Investments to “Identify all persons who have been a  
4 member, manager, owner, employee, or agent of Razuki Investments, LLC”. The request further  
5 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
6 failed to obtain a judgment against. A protective order is needed if any information is to be  
7 produced.

8 Interrogatory No. 15: Identify and describe all of Razuki Investments, LLC’s affiliates,  
9 subsidiaries, parent companies, or any other company that claims, or has claimed, an interest in  
10 Razuki Investments, LLC at any time since October 17, 2016.

11 RESPONSE: The interrogatory was properly objected to as it seeks information since  
12 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
13 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
14 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
15 section 708.020(a) by seeking Razuki Investments to “Identify and describe all of Razuki  
16 Investments, LLC’s affiliates, subsidiaries, parent companies, or any other company that claims, or  
17 has claimed, an interest in Razuki Investments, LLC”. The request further improperly seeks to  
18 invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a  
19 judgment against. A protective order is needed if any information is to be produced.

20 Interrogatory No. 16: Identify all policies of insurance Razuki Investments, LLC currently  
21 owns, holds, or claims any type of interest in, directly or indirectly, in whole or in part, or has been  
22 covered under at any time since October 17, 2016.

23 RESPONSE: The interrogatory was properly objected to as it seeks information since  
24 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
25 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
26 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
27 section 708.020(a) by seeking Razuki Investments to “Identify all policies of insurance Razuki  
28 Investments, LLC currently owns, holds, or claims any type of interest in, directly or indirectly, in  
whole or in part, or has been covered under”. 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 information is to be produced.

1 Interrogatory No. 17: Identify any safe deposit boxes that Razuki Investments, LLC has  
2 either rented or had access to at any time since October 17, 2016.

3 RESPONSE: The interrogatory was properly objected to as it seeks information since  
4 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
5 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
6 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
7 section 708.020(a) by seeking Razuki Investments to “Identify any safe deposit boxes that Razuki  
8 Investments, LLC has either rented or had access to”. The request further improperly seeks to  
9 invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a  
10 judgment against. A protective order is needed if any information is to be produced.

11 Interrogatory No. 18: If you claim that any of the revenue, income, or assets of Razuki  
12 Investments, LLC is exempt from judgment enforcement in this action, identify all such revenue,  
13 income, or assets and state the basis for the claimed exemption.

14 RESPONSE: The interrogatory was properly objected to as it seeks information since  
15 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
16 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
17 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
18 section 708.020(a) by seeking Razuki Investments to “Identify all such revenue, income, or assets  
19 and state the basis for the claimed exemption”. The request further improperly seeks to invade the  
20 privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
21 against. A protective order is needed if any information is to be produced.

22 Interrogatory No. 19: Identify each third party who currently possesses, owns, or controls any  
23 of the real property, vehicles, tangible property, or intangible property identified by Razuki  
24 Investments, LLC in response to these interrogatories.

25 RESPONSE: The interrogatory was properly objected to as it seeks information since  
26 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
27 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
28 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
section 708.020(a) by seeking Razuki Investments to “Identify each third party who currently  
possesses, owns, or controls any of the real property, vehicles, tangible property, or intangible  
property identified by Razuki Investments, LLC”. 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 information is to be produced.

3 Interrogatory No. 20: Identify all transferees of any of the income or assets of Razuki  
4 Investments, LLC over the value of \$10,000.00 at any time since October 17, 2016.

5 RESPONSE: The interrogatory was properly objected to as it seeks information since  
6 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
7 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
8 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
9 section 708.020(a) by seeking Razuki Investments to “Identify all transferees of any of the income  
10 or assets of Razuki Investments, LLC over the value of \$10,000.00”. The request further  
11 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
12 failed to obtain a judgment against. A protective order is needed if any information is to be  
13 produced.

14 **III. No Sanctions**

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

22 **IV. Conclusion**

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

25 Dated: July 17, 2024

LAW OFFICES OF DOUGLAS JAFFE

26 /s/ Douglas Jaffe  
27 Douglas Jaffe  
28



1 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
2 section 708.020(a) by seeking Razuki Investments to “Identify all real property in which Razuki  
3 Investments, LLC has, either directly or indirectly, had any type of interest”. The request further  
4 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
5 failed to obtain a judgment against. A protective order is needed if any information is to be  
6 produced.

7 6. Interrogatory No. 3: Describe all sources of income, revenue, or remuneration of any kind  
8 received by Razuki Investments, LLC at any time since October 17, 2016, including,  
9 without limitation, all sources of any payments for goods and services, interest income,  
10 operating income, payments on accounts receivables, commissions, agency fees, loan  
11 repayments, rents, royalties, license fees, dividends, distributions, payments relating to  
12 sales of assets, payments on contracts, or any other payment or remuneration received by  
13 Razuki Investments, LLC in connection with the operation of its business.

14 RESPONSE: The interrogatory was properly objected to as it seeks information since  
15 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
16 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
17 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
18 section 708.020(a) by seeking Razuki Investments to “Describe all sources of income, revenue, or  
19 remuneration of any kind received by Razuki Investments, LLC”. The request further improperly  
20 seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to  
21 obtain a judgment against. A protective order is needed if any information is to be produced.

22 7. Interrogatory No. 4: State the amount of all income declared by Razuki Investments, LLC  
23 on all state and federal income tax returns and all related forms and schedules (including  
24 all amended returns, forms, and schedules) filed at any time since October 17, 2016.

25 RESPONSE: The interrogatory was properly objected to as it seeks information since  
26 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
27 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
28 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
section 708.020(a) by seeking Razuki Investments to “State the amount of all income declared by  
Razuki Investments, LLC on all state and federal income tax returns and all 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 information is to be produced.

1 8. Interrogatory No. 5: Identify all documents evidencing any income, revenue, or  
2 remuneration of any kind received by Razuki Investments, LLC from any source at any  
3 time since October 17, 2016.

4 RESPONSE: The interrogatory was properly objected to as it seeks information since  
5 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
6 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
7 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
8 section 708.020(a) by seeking Razuki Investments to “Identify all documents evidencing any  
9 income, revenue, or remuneration of any kind received by Razuki Investments, LLC from any  
10 source”. The request further improperly seeks to invade the privacy of non-judgment debtor third  
11 parties for which Plaintiffs failed to obtain a judgment against. A protective order is needed if  
12 any information is to be produced.

13 9. Interrogatory No. 6: Identify and describe all debts and liabilities owed by Razuki  
14 Investments, LLC at any time since October 17, 2016.

15 RESPONSE: The interrogatory was properly objected to as it seeks information since  
16 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
17 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
18 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
19 section 708.020(a) by seeking Razuki Investments to “Identify and describe all debts and liabilities  
20 owed by Razuki Investments, LLC”. The request further improperly seeks to invade the privacy  
21 of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment against. A  
22 protective order is needed if any information is to be produced.

23 10. Interrogatory No. 7: Identify all documents evidencing any debts and liabilities owed by  
24 Razuki Investments, LLC at any time since October 17, 2016.

25 RESPONSE: The interrogatory was properly objected to as it seeks information since  
26 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
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28 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
section 708.020(a) by seeking Razuki Investments to “Identify all documents evidencing any debts  
and liabilities owed by Razuki Investments, LLC”. 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 information is to be produced.

3 11. Interrogatory No. 8: Identify by jurisdiction and case number all legal actions in which  
4 Razuki Investments, LLC has been a party at any time since October 17, 2016.

5 RESPONSE: The interrogatory was properly objected to as it seeks information since  
6 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
7 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
8 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
9 section 708.020(a) by seeking Razuki Investments to “Identify by jurisdiction and case number all  
10 legal actions in which Razuki Investments, LLC has been a party”. The request further improperly  
11 seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to  
12 obtain a judgment against. A protective order is needed if any information is to be produced.

13 12. Interrogatory No. 9: Identify and describe all debts and liabilities presently owed to  
14 Razuki Investments, LLC by any person or entity.

15 RESPONSE: The interrogatory was properly objected to and thus seeks information  
16 which is not to aid in enforcement of the money judgment in violation of CCP section 708.020(a)  
17 by seeking Razuki Investments to “Identify and describe all debts and liabilities presently owed to  
18 Razuki Investments, LLC by any person or entity”. The request further improperly seeks to invade  
19 the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
20 against. A protective order is needed if any information is to be produced.

21 13. Interrogatory No. 10: Identify all banks, brokerage firms, investment firms, or other  
22 financial institutions for any account which Razuki Investments, LLC currently owns,  
23 holds, or claims an interest in, in whole or in part, or owned, held, or claimed an interest  
24 in, in whole or in part, at any time since October 17, 2016.

25 RESPONSE: The interrogatory was properly objected to as it seeks information since  
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27 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
28 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
section 708.020(a) by seeking Razuki Investments to “Identify all banks, brokerage firms,  
investment firms, or other financial institutions for any account which Razuki Investments, LLC  
currently owns, holds, or claims an interest in, in whole or in part, or owned, held, or claimed an  
interest in, in whole or in part”. The request further improperly seeks to invade the privacy of

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

3 14. Interrogatory No. 11: Identify and describe all vehicles, aircraft, boats, or other water  
4 vessels that Razuki Investments, LLC currently owns, holds, or claims an interest in,  
5 directly or indirectly, in whole or in part, or owned, held, or claimed an interest in,  
6 directly or indirectly, in whole or in part, at any time since October 17, 2016.

7 RESPONSE: The interrogatory was properly objected to as it seeks information since  
8 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
9 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
10 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
11 section 708.020(a) by seeking Razuki Investments to “Identify and describe all vehicles, aircraft,  
12 boats, or other water vessels that Razuki Investments, LLC currently owns, holds, or claims an  
13 interest in, directly or indirectly, in whole or in part, or owned, held, or claimed an interest in,  
14 directly or indirectly, in whole or in part”. The request further improperly seeks to invade the  
15 privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
16 against. A protective order is needed if any information is to be produced.

17 15. Interrogatory No. 12: Identify and describe any and all tangible property with a value  
18 over \$10,000.00 which Razuki Investments, LLC currently owns, holds, or claims an  
19 interest in, directly or indirectly, in whole or in part, or owned, held, or claimed an  
20 interest in, directly or indirectly, in whole or in part, at any time since October 17, 2016.

21 RESPONSE: The interrogatory was properly objected to as it seeks information since  
22 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
23 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
24 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
25 section 708.020(a) by seeking Razuki Investments to “Identify and describe any and all tangible  
26 property with a value over \$10,000.00 which Razuki Investments, LLC currently owns, holds, or  
27 claims an interest in, directly or indirectly, in whole or in part, or owned, held, or claimed an interest  
28 in, directly or indirectly”. 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 information is to be produced.

16. Interrogatory No. 13: Identify and describe all intangible property with a value over  
\$10,000.00 which Razuki Investments, LLC currently owns, holds, or claims any type of

1 interest in, directly or indirectly, in whole or in part, or owned, held, or claimed any type  
2 of interest in, directly or indirectly.

3 RESPONSE: The interrogatory was properly objected to and thus seeks information  
4 which is not to aid in enforcement of the money judgment in violation of CCP section 708.020(a)  
5 by seeking Razuki Investments to “Identify and describe all intangible property with a value over  
6 \$10,000.00 which Razuki Investments, LLC currently owns, holds, or claims any type of interest in,  
7 directly or indirectly, in whole or in part, or owned, held, or claimed any type of interest in, directly  
8 or indirectly.”. The request further improperly seeks to invade the privacy of non-judgment  
9 debtor third parties for which Plaintiffs failed to obtain a judgment against. A protective order is  
10 needed if any information is to be produced.

11 17. Interrogatory No. 14: Identify all persons who have been a member, manager, owner,  
12 employee, or agent of Razuki Investments, LLC at any time since October 17, 2016.

13 RESPONSE: The interrogatory was properly objected to as it seeks information since  
14 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
15 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
16 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
17 section 708.020(a) by seeking Razuki Investments to “Identify all persons who have been a  
18 member, manager, owner, employee, or agent of Razuki Investments, LLC”. The request further  
19 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
20 failed to obtain a judgment against. A protective order is needed if any information is to be  
21 produced.

22 18. Interrogatory No. 15: Identify and describe all of Razuki Investments, LLC’s affiliates,  
23 subsidiaries, parent companies, or any other company that claims, or has claimed, an  
24 interest in Razuki Investments, LLC at any time since October 17, 2016.

25 RESPONSE: The interrogatory was properly objected to as it seeks information since  
26 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
27 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
28 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
section 708.020(a) by seeking Razuki Investments to “Identify and describe all of Razuki  
Investments, LLC’s affiliates, subsidiaries, parent companies, or any other company that claims, or  
has claimed, an interest in Razuki Investments, LLC”. The request further improperly seeks to

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

3 19. Interrogatory No. 16: Identify all policies of insurance Razuki Investments, LLC  
4 currently owns, holds, or claims any type of interest in, directly or indirectly, in whole or  
5 in part, or has been covered under at any time since October 17, 2016.

6 RESPONSE: The interrogatory was properly objected to as it seeks information since  
7 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
8 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
9 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
10 section 708.020(a) by seeking Razuki Investments to “Identify all policies of insurance Razuki  
11 Investments, LLC currently owns, holds, or claims any type of interest in, directly or indirectly, in  
12 whole or in part, or has been covered under”. The request further improperly seeks to invade the  
13 privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
14 against. A protective order is needed if any information is to be produced.

15 20. Interrogatory No. 17: Identify any safe deposit boxes that Razuki Investments, LLC has  
16 either rented or had access to at any time since October 17, 2016.

17 RESPONSE: The interrogatory was properly objected to as it seeks information since  
18 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
19 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
20 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
21 section 708.020(a) by seeking Razuki Investments to “Identify any safe deposit boxes that Razuki  
22 Investments, LLC has either rented or had access to”. The request further improperly seeks to  
23 invade the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a  
24 judgment against. A protective order is needed if any information is to be produced.

25 21. Interrogatory No. 18: If you claim that any of the revenue, income, or assets of Razuki  
26 Investments, LLC is exempt from judgment enforcement in this action, identify all such  
27 revenue, income, or assets and state the basis for the claimed exemption.

28 RESPONSE: The interrogatory was properly objected to as it seeks information since  
2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
section 708.020(a) by seeking Razuki Investments to “Identify all such revenue, income, or assets



1 and state the basis for the claimed exemption”. The request further improperly seeks to invade the  
2 privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
3 against. A protective order is needed if any information is to be produced.

4 22. Interrogatory No. 19: Identify each third party who currently possesses, owns, or controls  
5 any of the real property, vehicles, tangible property, or intangible property identified by  
6 Razuki Investments, LLC in response to these interrogatories.

7 RESPONSE: The interrogatory was properly objected to as it seeks information since  
8 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
9 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
10 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
11 section 708.020(a) by seeking Razuki Investments to “Identify each third party who currently  
12 possesses, owns, or controls any of the real property, vehicles, tangible property, or intangible  
13 property identified by Razuki Investments, LLC”. The request further improperly seeks to invade  
14 the privacy of non-judgment debtor third parties for which Plaintiffs failed to obtain a judgment  
15 against. A protective order is needed if any information is to be produced.

16 23. Interrogatory No. 20: Identify all transferees of any of the income or assets of Razuki  
17 Investments, LLC over the value of \$10,000.00 at any time since October 17, 2016.

18 RESPONSE: The interrogatory was properly objected to as it seeks information since  
19 2016, and thus seeks information which is not to aid in enforcement of the money judgment in  
20 violation of CCP section 708.020(a). The interrogatory was also properly objected to and thus  
21 seeks information which is not to aid in enforcement of the money judgment in violation of CCP  
22 section 708.020(a) by seeking Razuki Investments to “Identify all transferees of any of the income  
23 or assets of Razuki Investments, LLC over the value of \$10,000.00”. The request further  
24 improperly seeks to invade the privacy of non-judgment debtor third parties for which Plaintiffs  
25 failed to obtain a judgment against. A protective order is needed if any information is to be  
26 produced.

27 24. No sanctions are appropriate given the proper objections as set forth above. No  
28 sanctions should be ordered as against Razuki Investments’ counsel as it was Razuki  
Investments’ decision to object to the requests and counsel was required to follow that decision.  
The amount of the sanctions is also excessive and without support for the hourly rate requested

1 and the work involved (and by which attorneys). Counsel for Razuki Investments met and  
2 conferred with counsel for Plaintiffs and they refused to alter the interrogatories other than a date  
3 of June 17, 2017. See attached.

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

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/s/ Douglas Jaffe  
DOUGLAS JAFFE



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 ]**

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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  
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Telephone: (619) 400-4945  
Facsimile: (619) 400-4947

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