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8 *Attorneys for Plaintiff*

ELECTRONICALLY FILED
Superior Court of California,
County of San Diego
04/18/2018 at 09:35:00 AM
Clerk of the Superior Court
By Katelin O'Keefe, Deputy Clerk

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

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

14 Plaintiff,

15 v.

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

Defendants.

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

CLASS ACTION

**DECLARATION OF WILLIAM R. RESTIS
IN SUPPORT OF PLAINTIFF'S MOTION
TO COMPEL SPECIAL
INTERROGATORIES (SET ONE) TO
ALL DEFENDANTS**

Date: May 18, 2018

Time: 9:00 a.m.

Judge: Hon. Joel R. Wohlfeil

Ctrm: C-73

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

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

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

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

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

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

19 6. Attached hereto as **Exhibit I** is a true and correct copy of Defendant PLPCC's
20 Response to Special Interrogatories (Set One).

21 7. Attached hereto as **Exhibit J and K** are true and correct copies of the Individual
22 Defendants' Response to Plaintiff's Special Interrogatories (Set One). The responses are identical to
23 both defendants.

24 8. Attached hereto as **Exhibit L through P** are true and correct copies of the Shell
25 Companies' Response to Plaintiff's Special Interrogatories (Set One). The responses are identical to
26 these defendants.

1 9. On February March 12, 2018 I sent a letter to counsel for Defendants Tamara
2 Leetham and Matthew Dart addressing the relevancy of Special Interrogatories (Set One), and
3 Defendants' deficient responses thereto. A true and correct copy of my March 12th letter is attached
4 hereto as **Exhibit Q**.

5 10. Defendants never responded to my March 12th letter.

6 11. On March 23, 2018, I conducted an in-person meet and confer session with Tamara
7 Leetham and Mattew Dart at my office. At that meet and confer, I again requested that Defendants
8 respond in writing to Plaintiff's March 12th meet and confer letter to frame issues in dispute for the
9 Court. Defendants' counsel stated they would provide such written response, but have not done so.

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

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

13
14 /s/ William R. Restis
15 William R. Restis, Esq.
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EXHIBIT A

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

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

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

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

14 Plaintiff,

15 v.

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

27 Defendants.

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

PLAINTIFF'S SPECIAL
INTERROGATORIES (SET ONE) TO
DEFENDANT POINT LOMA PATIENTS
CONSUMER COOPERATIVE
CORPORATION

[Code Civ. Pro. §§2030.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

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

5 Pursuant to California Code of Civil Procedure §2030.010 *et seq.*, Plaintiff hereby
6 propounds these Special Interrogatories (Set One) to Defendant Point Loma Patients Consumer
7 Cooperative Corporation which shall answer the following interrogatories, separately, fully and
8 under oath, and in the manner provided by the California Code of Civil Procedure and the terms set
9 forth herein. Point Loma Patients Consumer Cooperative Corporation, is to provide written
10 responses to the following interrogatories within 30 days of their service in conformance with the
11 requirements of the Code of Civil Procedure section 2030.210 *et seq.*

12 **I. DEFINITIONS**

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

17 “CLOUD” refers to any remotely hosted or stored electronic information, DATABASE or
18 SOFTWARE that can be accessed through a network connection, wide area networking (WAN), or
19 internet connection. CLOUD includes Software-as-a-Service (SaaS), Platform-as-a-Service (Paas)
20 and/or Infrastructure-as-a-service (IaaS).

21 “DATABASE” means a collection of electronically stored information that is organized so
22 that it can be managed and updated, and includes, by way of example only, aggregations of data
23 records or files, such as purchase and sales transactions, financial records, income and expense data,
24 inventory data, and/or customer or member profiles. A DATABASE may be flat, hierarchical,
25 network, relational, distributed, NoSQL, object-oriented, or graph-oriented.

1 “SOFTWARE” means any set of programmatic instructions directing a COMPUTER to
2 perform specific tasks, and includes system software, middleware software, programing software
3 and application software. By way of example only, SOFTWARE includes word processors,
4 spreadsheets, electronic mail, accounting, sales, point of sale or POS, presentation, publishing,
5 small business, calendaring and scheduling, and includes any database management system
6 software that allows users to manipulate, retrieve and manage data stored within a DATABASE.

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

13 **II. RELEVANT TIME PERIOD**

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

17 **III. SPECIAL INTERROGATORIES**

18 Special Interrogatory No. 1:

19 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes of this
20 Interrogatory, means to provide the following information:

- 21 (a) Brand;
22 (b) Model; and
23 (c) Serial or other identification number;

1 Special Interrogatory No. 2:

2 Please identify all persons that have accessed or used, at any time, each COMPUTER
3 identified in response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means
4 to provide the following information:

5 (a) Name;

6 (b) Address;

7 (c) Telephone number; and

8 (d) The specific COMPUTERS such person accessed.

9 Special Interrogatory No. 3:

10 Please identify the custodian of each COMPUTER identified in response to Special
11 Interrogatory 1.

12 Special Interrogatory No. 4:

13 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
14 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
15 the following information:

16 (a) Brand;

17 (b) Software name;

18 (c) Version number;

19 (d) Serial number or product code;

20 Special Interrogatory No. 5:

21 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

22 Special Interrogatory No. 6:

23 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
24 temporarily.

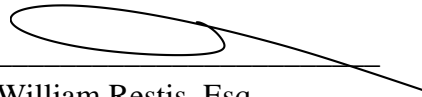
1 Special Interrogatory No. 7:

2 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
3 temporarily.

4
5 DATED: November 29, 2017

Respectfully submitted,

6 THE RESTIS LAW FIRM, P.C.

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16 Jeffrey R. Krinsk, Esq. (SBN 109234)
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EXHIBIT B

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8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

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

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

14 Plaintiff,

15 v.

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

27 Defendants.

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

PLAINTIFF'S SPECIAL
INTERROGATORIES (SET ONE) TO
DEFENDANT ADAM KNOPF

[Code Civ. Pro. §§2030.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK

2 RESPONDING PARTY: Defendant ADAM KNOPF

3 SET NUMBER: ONE (1)

4 Pursuant to California Code of Civil Procedure §2030.010 *et seq.*, Plaintiff hereby
5 propounds these Special Interrogatories (Set One) to Defendant Adam Knopf which shall answer
6 the following interrogatories, separately, fully and under oath, and in the manner provided by the
7 California Code of Civil Procedure and the terms set forth herein. Adam Knopf, is to provide
8 written responses to the following interrogatories within 30 days of their service in conformance
9 with the requirements of the Code of Civil Procedure section 2030.210 *et seq.*

10 **I. DEFINITIONS**

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

15 “CLOUD” refers to any remotely hosted or stored electronic information, DATABASE or
16 SOFTWARE that can be accessed through a network connection, wide area networking (WAN), or
17 internet connection. CLOUD includes Software-as-a-Service (SaaS), Platform-as-a-Service (Paas)
18 and/or Infrastructure-as-a-service (IaaS).

19 “DATABASE” means a collection of electronically stored information that is organized so
20 that it can be managed and updated, and includes, by way of example only, aggregations of data
21 records or files, such as purchase and sales transactions, financial records, income and expense data,
22 inventory data, and/or customer or member profiles. A DATABASE may be flat, hierarchical,
23 network, relational, distributed, NoSQL, object-oriented, or graph-oriented.

24 “SOFTWARE” means any set of programmatic instructions directing a COMPUTER to
25 perform specific tasks, and includes system software, middleware software, programing software
26 and application software. By way of example only, SOFTWARE includes word processors,
27

1 spreadsheets, electronic mail, accounting, sales, point of sale or POS, presentation, publishing,
2 small business, calendaring and scheduling, and includes any database management system
3 software that allows users to manipulate, retrieve and manage data stored within a DATABASE.

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

7 **II. RELEVANT TIME PERIOD**

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

11 **III. SPECIAL INTERROGATORIES**

12 Special Interrogatory No. 1:

13 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes of this
14 Interrogatory, means to provide the following information:

- 15 (a) Brand;
16 (b) Model; and
17 (c) Serial or other identification number;

18 Special Interrogatory No. 2:

19 Please identify all persons that have accessed or used, at any time, each COMPUTER
20 identified in response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means
21 to provide the following information:

- 22 (a) Name;
23 (b) Address;
24 (c) Telephone number; and
25 (d) The specific COMPUTERS such person accessed.

1 Special Interrogatory No. 3:

2 Please identify the custodian of each COMPUTER identified in response to Special
3 Interrogatory 1.

4 Special Interrogatory No. 4:

5 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
6 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
7 the following information:

- 8 (a) Brand;
- 9 (b) Software name;
- 10 (c) Version number;
- 11 (d) Serial number or product code;

12 Special Interrogatory No. 5:

13 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

14 Special Interrogatory No. 6:

15 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
16 temporarily.


17 Special Interrogatory No. 7:

18 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
19 temporarily.

20 DATED: November 29, 2017

Respectfully submitted,

22 THE RESTIS LAW FIRM, P.C.

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

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ATTORNEYS FOR PLAINTIFFS

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EXHIBIT C

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7 william@restislaw.com

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

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

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

15 v.

16 **POINT LOMA PATIENTS CONSUMER**
17 **COOPERATIVE CORPORATION**, A
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19 Individual, **JUSTUS H. HENKES IV**, an
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25 LLC, **FAR WEST STAFFING, LLC**, a
26 California LLC, and **DOES 1-50**,

27 Defendants.

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

PLAINTIFF'S SPECIAL
INTERROGATORIES (SET ONE) TO
DEFENDANT JUSTUS H. HENKES IV

[Code Civ. Pro. §§2030.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK

2 RESPONDING PARTY: Defendant JUSTUS H. HENKES IV

3 SET NUMBER: ONE (1)

4 Pursuant to California Code of Civil Procedure §2030.010 *et seq.*, Plaintiff hereby
5 propounds these Special Interrogatories (Set One) to Defendant Justus H. Henkes IV which shall
6 answer the following interrogatories, separately, fully and under oath, and in the manner provided
7 by the California Code of Civil Procedure and the terms set forth herein. Justus H. Henkes IV, is to
8 provide written responses to the following interrogatories within 30 days of their service in
9 conformance with the requirements of the Code of Civil Procedure section 2030.210 *et seq.*

10 **I. DEFINITIONS**

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

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17 internet connection. CLOUD includes Software-as-a-Service (SaaS), Platform-as-a-Service (Paas)
18 and/or Infrastructure-as-a-service (IaaS).

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1 spreadsheets, electronic mail, accounting, sales, point of sale or POS, presentation, publishing,
2 small business, calendaring and scheduling, and includes any database management system
3 software that allows users to manipulate, retrieve and manage data stored within a DATABASE.

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

7 **II. RELEVANT TIME PERIOD**

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

11 **III. SPECIAL INTERROGATORIES**

12 Special Interrogatory No. 1:

13 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes of this
14 Interrogatory, means to provide the following information:

- 15 (a) Brand;
16 (b) Model; and
17 (c) Serial or other identification number;

18 Special Interrogatory No. 2:

19 Please identify all persons that have accessed or used, at any time, each COMPUTER
20 identified in response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means
21 to provide the following information:

- 22 (a) Name;
23 (b) Address;
24 (c) Telephone number; and
25 (d) The specific COMPUTERS such person accessed.

1 Special Interrogatory No. 3:

2 Please identify the custodian of each COMPUTER identified in response to Special
3 Interrogatory 1.

4 Special Interrogatory No. 4:

5 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
6 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
7 the following information:

- 8 (a) Brand;
9 (b) Software name;
10 (c) Version number;
11 (d) Serial number or product code;

12 Special Interrogatory No. 5:

13 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

14 Special Interrogatory No. 6:

15 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
16 temporarily.


17 Special Interrogatory No. 7:

18 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
19 temporarily.

20 DATED: November 29, 2017

Respectfully submitted,

22 THE RESTIS LAW FIRM, P.C.

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ATTORNEYS FOR PLAINTIFFS

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EXHIBIT D

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8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

10 **SUPERIOR COURT FOR THE STATE OF CALIFORNIA**
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20 Individual, **419 CONSULTING INC.**, a
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22 **GREENS LLC**, a California LLC, **FAR WEST**
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25 LLC, **FAR WEST STAFFING, LLC**, a
26 California LLC, and **DOES 1-50**,

27 Defendants.

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

PLAINTIFF'S SPECIAL
INTERROGATORIES (SET ONE) TO
DEFENDANT 419 CONSULTING INC.

[Code Civ. Pro. §§2030.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK

2 RESPONDING PARTY: Defendant 419 CONSULTING INC.

3 SET NUMBER: ONE (1)

4 Pursuant to California Code of Civil Procedure §2030.010 *et seq.*, Plaintiff hereby
5 propounds these Special Interrogatories (Set One) to Defendant 419 Consulting Inc. which shall
6 answer the following interrogatories, separately, fully and under oath, and in the manner provided
7 by the California Code of Civil Procedure and the terms set forth herein. 419 Consulting Inc., is to
8 provide written responses to the following interrogatories within 30 days of their service in
9 conformance with the requirements of the Code of Civil Procedure section 2030.210 *et seq.*

10 **I. DEFINITIONS**

11 “COMPUTER” means all devices utilizing microchips to facilitate processing, analysis, or
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1 spreadsheets, electronic mail, accounting, sales, point of sale or POS, presentation, publishing,
2 small business, calendaring and scheduling, and includes any database management system
3 software that allows users to manipulate, retrieve and manage data stored within a DATABASE.

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

10 **II. RELEVANT TIME PERIOD**

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

14 **III. SPECIAL INTERROGATORIES**

15 Special Interrogatory No. 1:

16 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes of this
17 Interrogatory, means to provide the following information:

- 18 (a) Brand;
- 19 (b) Model; and
- 20 (c) Serial or other identification number;

21 Special Interrogatory No. 2:

22 Please identify all persons that have accessed or used, at any time, each COMPUTER
23 identified in response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means
24 to provide the following information:

- 25 (a) Name;
- 26 (b) Address;

1 (c) Telephone number; and

2 (d) The specific COMPUTERS such person accessed.

3 Special Interrogatory No. 3:

4 Please identify the custodian of each COMPUTER identified in response to Special
5 Interrogatory 1.

6 Special Interrogatory No. 4:

7 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
8 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
9 the following information:

10 (a) Brand;

11 (b) Software name;

12 (c) Version number;

13 (d) Serial number or product code;

14 Special Interrogatory No. 5:

15 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

16 Special Interrogatory No. 6:

17 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
18 temporarily.

19 Special Interrogatory No. 7:

20 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
21 temporarily.

22
23 DATED: November 29, 2017

Respectfully submitted,

24 THE RESTIS LAW FIRM, P.C.

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EXHIBIT E

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7 william@restislaw.com

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

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

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

14 Plaintiff,

15 v.

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

27 Defendants.

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

PLAINTIFF'S SPECIAL
INTERROGATORIES (SET ONE) TO
DEFENDANT GOLDEN STATE GREENS
LLC

[Code Civ. Pro. §§2030.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK

2 RESPONDING PARTY: Defendant GOLDEN STATE GREENS LLC

3 SET NUMBER: ONE (1)

4 Pursuant to California Code of Civil Procedure §2030.010 *et seq.*, Plaintiff hereby
5 propounds these Special Interrogatories (Set One) to Defendant Golden State Greens LLC which
6 shall answer the following interrogatories, separately, fully and under oath, and in the manner
7 provided by the California Code of Civil Procedure and the terms set forth herein. Golden State
8 Greens LLC, is to provide written responses to the following interrogatories within 30 days of their
9 service in conformance with the requirements of the Code of Civil Procedure section 2030.210 *et*
10 *seq.*

11 **I. DEFINITIONS**

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

16 “CLOUD” refers to any remotely hosted or stored electronic information, DATABASE or
17 SOFTWARE that can be accessed through a network connection, wide area networking (WAN), or
18 internet connection. CLOUD includes Software-as-a-Service (SaaS), Platform-as-a-Service (Paas)
19 and/or Infrastructure-as-a-service (IaaS).

20 “DATABASE” means a collection of electronically stored information that is organized so
21 that it can be managed and updated, and includes, by way of example only, aggregations of data
22 records or files, such as purchase and sales transactions, financial records, income and expense data,
23 inventory data, and/or customer or member profiles. A DATABASE may be flat, hierarchical,
24 network, relational, distributed, NoSQL, object-oriented, or graph-oriented.

25 “SOFTWARE” means any set of programmatic instructions directing a COMPUTER to
26 perform specific tasks, and includes system software, middleware software, programing software

1 and application software. By way of example only, SOFTWARE includes word processors,
2 spreadsheets, electronic mail, accounting, sales, point of sale or POS, presentation, publishing,
3 small business, calendaring and scheduling, and includes any database management system
4 software that allows users to manipulate, retrieve and manage data stored within a DATABASE.

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

11 **II. RELEVANT TIME PERIOD**

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

15 **III. SPECIAL INTERROGATORIES**

16 Special Interrogatory No. 1:

17 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes of this
18 Interrogatory, means to provide the following information:

- 19 (a) Brand;
20 (b) Model; and
21 (c) Serial or other identification number;

22 Special Interrogatory No. 2:

23 Please identify all persons that have accessed or used, at any time, each COMPUTER
24 identified in response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means
25 to provide the following information:

- 26 (a) Name;

- 1 (b) Address;
2 (c) Telephone number; and
3 (d) The specific COMPUTERS such person accessed.

4 Special Interrogatory No. 3:

5 Please identify the custodian of each COMPUTER identified in response to Special
6 Interrogatory 1.

7 Special Interrogatory No. 4:

8 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
9 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
10 the following information:

- 11 (a) Brand;
12 (b) Software name;
13 (c) Version number;
14 (d) Serial number or product code;

15 Special Interrogatory No. 5:

16 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

17 Special Interrogatory No. 6:

18 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
19 temporarily.

20 Special Interrogatory No. 7:

21 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
22 temporarily.

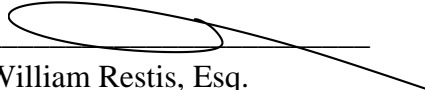
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1
2 DATED: November 29, 2017

Respectfully submitted,

3
4 THE RESTIS LAW FIRM, P.C.

5
6 
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8 550 West C Street, Suite 1760
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10 Tel: +1.619.270.8383
11 Email: william@restislaw.com
12 ATTORNEYS FOR PLAINTIFFS

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17 San Diego, California 92101
18 Telephone: (619) 238-1333
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EXHIBIT F

1 THE RESTIS LAW FIRM, P.C.
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3 550 West C Street, Suite 1760
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5 Tel: +1.619.270.8383
6 Fax: +1.619.752.1552
7 william@restislaw.com

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

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

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

14 Plaintiff,

15 v.

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

27 Defendants.

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

PLAINTIFF'S SPECIAL
INTERROGATORIES (SET ONE) TO
DEFENDANT FAR WEST MANAGEMENT,
LLC

[Code Civ. Pro. §§2030.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK

2 RESPONDING PARTY: Defendant FAR WEST MANAGEMENT, LLC

3 SET NUMBER: ONE (1)

4 Pursuant to California Code of Civil Procedure §2030.010 *et seq.*, Plaintiff hereby
5 propounds these Special Interrogatories (Set One) to Defendant Far West Management, LLC which
6 shall answer the following interrogatories, separately, fully and under oath, and in the manner
7 provided by the California Code of Civil Procedure and the terms set forth herein. Far West
8 Management, LLC, is to provide written responses to the following interrogatories within 30 days
9 of their service in conformance with the requirements of the Code of Civil Procedure section
10 2030.210 *et seq.*

11 **I. DEFINITIONS**

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

16 “CLOUD” refers to any remotely hosted or stored electronic information, DATABASE or
17 SOFTWARE that can be accessed through a network connection, wide area networking (WAN), or
18 internet connection. CLOUD includes Software-as-a-Service (SaaS), Platform-as-a-Service (Paas)
19 and/or Infrastructure-as-a-service (IaaS).

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21 that it can be managed and updated, and includes, by way of example only, aggregations of data
22 records or files, such as purchase and sales transactions, financial records, income and expense data,
23 inventory data, and/or customer or member profiles. A DATABASE may be flat, hierarchical,
24 network, relational, distributed, NoSQL, object-oriented, or graph-oriented.

25 “SOFTWARE” means any set of programmatic instructions directing a COMPUTER to
26 perform specific tasks, and includes system software, middleware software, programing software

1 and application software. By way of example only, SOFTWARE includes word processors,
2 spreadsheets, electronic mail, accounting, sales, point of sale or POS, presentation, publishing,
3 small business, calendaring and scheduling, and includes any database management system
4 software that allows users to manipulate, retrieve and manage data stored within a DATABASE.

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

11 **II. RELEVANT TIME PERIOD**

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

15 **III. SPECIAL INTERROGATORIES**

16 Special Interrogatory No. 1:

17 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes of this
18 Interrogatory, means to provide the following information:

- 19 (a) Brand;
- 20 (b) Model; and
- 21 (c) Serial or other identification number;

22 Special Interrogatory No. 2:

23 Please identify all persons that have accessed or used, at any time, each COMPUTER
24 identified in response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means
25 to provide the following information:

- 26 (a) Name;

- 1 (b) Address;
- 2 (c) Telephone number; and
- 3 (d) The specific COMPUTERS such person accessed.

4 Special Interrogatory No. 3:

5 Please identify the custodian of each COMPUTER identified in response to Special
6 Interrogatory 1.

7 Special Interrogatory No. 4:

8 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
9 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
10 the following information:

- 11 (a) Brand;
- 12 (b) Software name;
- 13 (c) Version number;
- 14 (d) Serial number or product code;

15 Special Interrogatory No. 5:

16 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

17 Special Interrogatory No. 6:

18 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
19 temporarily.

20 Special Interrogatory No. 7:

21 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
22 temporarily.

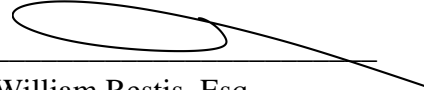
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1 DATED: November 29, 2017

Respectfully submitted,

2
3 THE RESTIS LAW FIRM, P.C.

4 

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EXHIBIT G

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7 william@restislaw.com

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

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

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

14 Plaintiff,

15 v.

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

27 Defendants.

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

PLAINTIFF'S SPECIAL
INTERROGATORIES (SET ONE) TO
DEFENDANT FAR WEST OPERATING, LLC

[Code Civ. Pro. §§2030.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK

2 RESPONDING PARTY: Defendant FAR WEST OPERATING, LLC

3 SET NUMBER: ONE (1)

4 Pursuant to California Code of Civil Procedure §2030.010 *et seq.*, Plaintiff hereby
5 propounds these Special Interrogatories (Set One) to Defendant Far West Operating, LLC which
6 shall answer the following interrogatories, separately, fully and under oath, and in the manner
7 provided by the California Code of Civil Procedure and the terms set forth herein. Far West
8 Operating, LLC, is to provide written responses to the following interrogatories within 30 days of
9 their service in conformance with the requirements of the Code of Civil Procedure section 2030.210
10 *et seq.*

11 **I. DEFINITIONS**

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

16 “CLOUD” refers to any remotely hosted or stored electronic information, DATABASE or
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18 internet connection. CLOUD includes Software-as-a-Service (SaaS), Platform-as-a-Service (Paas)
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23 inventory data, and/or customer or member profiles. A DATABASE may be flat, hierarchical,
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26 perform specific tasks, and includes system software, middleware software, programing software
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1 and application software. By way of example only, SOFTWARE includes word processors,
2 spreadsheets, electronic mail, accounting, sales, point of sale or POS, presentation, publishing,
3 small business, calendaring and scheduling, and includes any database management system
4 software that allows users to manipulate, retrieve and manage data stored within a DATABASE.

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

11 **II. RELEVANT TIME PERIOD**

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

15 **III. SPECIAL INTERROGATORIES**

16 Special Interrogatory No. 1:

17 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes of this
18 Interrogatory, means to provide the following information:

- 19 (a) Brand;
- 20 (b) Model; and
- 21 (c) Serial or other identification number;

22 Special Interrogatory No. 2:

23 Please identify all persons that have accessed or used, at any time, each COMPUTER
24 identified in response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means
25 to provide the following information:

- 26 (a) Name;

- 1 (b) Address;
2 (c) Telephone number; and
3 (d) The specific COMPUTERS such person accessed.

4 Special Interrogatory No. 3:

5 Please identify the custodian of each COMPUTER identified in response to Special
6 Interrogatory 1.

7 Special Interrogatory No. 4:

8 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
9 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
10 the following information:

- 11 (a) Brand;
12 (b) Software name;
13 (c) Version number;
14 (d) Serial number or product code;

15 Special Interrogatory No. 5:

16 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

17 Special Interrogatory No. 6:

18 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
19 temporarily.

20 Special Interrogatory No. 7:

21 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
22 temporarily.

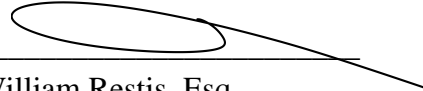
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1 DATED: November 29, 2017

Respectfully submitted,

2
3 THE RESTIS LAW FIRM, P.C.

4 

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

11 FINKELSTEIN & KRINSK LLP
12 Jeffrey R. Krinsk, Esq. (SBN 109234)
13 jrk@classactionlaw.com
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17 Facsimile: (619) 238-5425

EXHIBIT H

1 THE RESTIS LAW FIRM, P.C.
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6 Fax: +1.619.752.1552
7 william@restislaw.com

8 Attorney for Plaintiff

9 [Additional Counsel listed on Signature Page]

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

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

14 Plaintiff,

15 v.

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

27 Defendants.

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

PLAINTIFF'S SPECIAL
INTERROGATORIES (SET ONE) TO
DEFENDANT FAR WEST STAFFING, LLC

[Code Civ. Pro. §§2030.010 *et seq.*]

Hon. Joel L. Wohlfeil
Dept. C-73

1 PROPOUNDING PARTY: Plaintiff KARL BECK

2 RESPONDING PARTY: Defendant FAR WEST STAFFING, LLC

3 SET NUMBER: ONE (1)

4 Pursuant to California Code of Civil Procedure §2030.010 *et seq.*, Plaintiff hereby
5 propounds these Special Interrogatories (Set One) to Defendant Far West Staffing, LLC which shall
6 answer the following interrogatories, separately, fully and under oath, and in the manner provided
7 by the California Code of Civil Procedure and the terms set forth herein. Far West Staffing, LLC, is
8 to provide written responses to the following interrogatories within 30 days of their service in
9 conformance with the requirements of the Code of Civil Procedure section 2030.210 *et seq.*

10 **I. DEFINITIONS**

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

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25 perform specific tasks, and includes system software, middleware software, programing software
26 and application software. By way of example only, SOFTWARE includes word processors,
27

1 spreadsheets, electronic mail, accounting, sales, point of sale or POS, presentation, publishing,
2 small business, calendaring and scheduling, and includes any database management system
3 software that allows users to manipulate, retrieve and manage data stored within a DATABASE.

4 “YOU”, “YOUR,” means Defendant Far West Staffing, LLC, the responding party to
5 whom this discovery is directed, and includes any present or former company that YOU have
6 acquired, and any local, regional, national, and executive offices, divisions, or subsidiaries, and all
7 present and former directors, officers, partners, executive personnel, managers, agents or
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11 The Relevant Time Period is the period June 2014 to present, unless otherwise specifically
12 indicated, and shall include all information that relate to such period even though prepared,
13 published or disseminated outside of such time period.

14 **III. SPECIAL INTERROGATORIES**

15 Special Interrogatory No. 1:

16 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes of this
17 Interrogatory, means to provide the following information:

- 18 (a) Brand;
- 19 (b) Model; and
- 20 (c) Serial or other identification number;

21 Special Interrogatory No. 2:

22 Please identify all persons that have accessed or used, at any time, each COMPUTER
23 identified in response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means
24 to provide the following information:

- 25 (a) Name;
- 26 (b) Address;

1 (c) Telephone number; and

2 (d) The specific COMPUTERS such person accessed.

3 Special Interrogatory No. 3:

4 Please identify the custodian of each COMPUTER identified in response to Special
5 Interrogatory 1.

6 Special Interrogatory No. 4:

7 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
8 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
9 the following information:

10 (a) Brand;

11 (b) Software name;

12 (c) Version number;

13 (d) Serial number or product code;

14 Special Interrogatory No. 5:

15 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

16 Special Interrogatory No. 6:

17 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
18 temporarily.

19 Special Interrogatory No. 7:

20 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
21 temporarily.

22
23 DATED: November 29, 2017

Respectfully submitted,

24 THE RESTIS LAW FIRM, P.C.

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EXHIBIT I

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Far West Operating, LLC, and Far West Staffing, LLC
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12 Attorneys for Defendants 419 Consulting,
Adam Knopf, and Justus Henkes IV
13

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
COUNTY OF SAN DIEGO- CENTRAL DIVISION

16 KARL BECK, individually and on behalf
17 of all other similarly situated California
residents,
18

19 Plaintiff,

20 vs.

21 POINT LOMA PATIENTS CONSUMER
COOPERATIVE CORPORATION, a
22 California corporation, ADAM KNOPF,
an individual, JUSTUS H. HENKES IV,
23 an individual, 419 CONSULTING INC, a
California corporation, GOLDEN STATE
24 GREENS LLC, a California LLC, FAR
WEST MANAGEMENT LLC, a
25 California LLC, FAR WEST
OPERATING, LLC, a California LLC,
26 FAR WEST STAFFING LLC, a California
LLC, and DOES 1-50;

27 Defendants.
28

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

**DEFENDANT POINT LOMA PATIENTS
CONSUMER COOPERATIVE
CORPORATION RESPONSES TO SPECIAL
INTERROGATORIES [SET ONE]
PROPOUNDED BY KARL BECK**

1 **PROPOUNDING PARTY:** Plaintiff KARL BECK

2 **RESPONDING PARTY:** Defendant POINT LOMA PATIENTS CONSUMER
3 COOPERATIVE CORPORATION

4 **SET NUMBER:** One

5 Defendant POINT LOMA PATIENTS CONSUMER COOPERATIVE CORPORATION
6 (“PLPCC” “Responding Party” or “Defendant”) submits the following responses to Special
7 Interrogatories, Set One, propounded by plaintiff KARL BECK (“Propounding Party” or
8 “Plaintiff”).

9 **RESPONSES TO SPECIAL INTERROGATORIES**

10 **SPECIAL INTERROGATORY NO. 1:**

11 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes of this
12 Interrogatory, means to provide the following information:

- 13 (a) Brand;
14 (b) Model; and
15 (c) Serial or other identification number;

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

17 Objection. This interrogatory is not full and complete in and of itself. It includes
18 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
19 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
20 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
21 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
22 admissible evidence. This interrogatory is also unduly burdensome and oppressive. Subject to
23 and without waiving said objections, Responding Party responds as follows: Approximately
24 twenty HP desktops, two HP Pavilion laptops.

25 Discovery is ongoing and incomplete and Responding Party’s responses are based on his
26 present knowledge and belief. Responding Party reserves the right to update this response as it
27 acquires additional information through this litigation and the discovery process.
28

1 **SPECIAL INTERROGATORY NO. 2:**

2 Please identify all persons that have accessed or used, at any time, each COMPUTER
3 identified in response to Special Interrogatory 1. Identify for purposes of this Interrogatory,
4 means to provide the following information:

- 5 (a) Name;
6 (b) Address;
7 (c) Telephone number; and
8 (d) The specific COMPUTERS such person accessed.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

10 Objection. This interrogatory is not full and complete in and of itself. It includes
11 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
12 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
13 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). This interrogatory is also
14 overbroad and unduly burdensome and oppressive given the number of current and former
15 personnel and the number of computers. The interrogatory also calls for information that is
16 neither relevant nor reasonably calculated to lead to the discovery of admissible evidence.

17 Subject to and without waiving said objections, Responding Party responds as follows:

18 Approximately 120 personnel use and access one or more company computers on a regular
19 basis. The specific personnel have changed over the years. Responding Party cannot
20 reasonably identify which personnel used or accessed which computer over the course of the
21 years covered by the interrogatory.

22 Discovery is ongoing and incomplete and Responding Party's responses are based on his
23 present knowledge and belief. Responding Party reserves the right to update this response as it
24 acquires additional information through this litigation and the discovery process.

25 **SPECIAL INTERROGATORY NO. 3:**

26 Please identify the custodian of each COMPUTER identified in response to Special
27 Interrogatory 1.
28

1 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

2 Objection. This interrogatory is not full and complete in and of itself. It includes
3 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
4 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
5 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
6 of admissible evidence. Subject to and without waiving said objections, Responding Party
7 responds as follows: Responding Party is the custodian of the desktops at its facilities; Judd
8 Henkes is the custodian of the two HP Pavilion laptops.

9 Discovery is ongoing and incomplete and Responding Party's responses are based on his
10 present knowledge and belief. Responding Party reserves the right to update this response as it
11 acquires additional information through this litigation and the discovery process.

12 **SPECIAL INTERROGATORY NO. 4:**

13 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
14 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
15 the following information:

- 16 (a) Brand;
17 (b) Software name;
18 (c) Version number;
19 (d) Serial number or product code;

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

21 Objection. This interrogatory is not full and complete in and of itself. It includes
22 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
23 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
24 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). This interrogatory is also
25 overbroad and unduly burdensome and oppressive given the number of computers. The
26 interrogatory also calls for information that is neither relevant nor reasonably calculated to lead to
27 the discovery of admissible evidence. Subject to and without waiving said objections,
28 Responding Party responds as follows: standard software that came with the computer; 420

1 Soft; Sales Force.

2 Discovery is ongoing and incomplete and Responding Party's responses are based on his
3 present knowledge and belief. Responding Party reserves the right to update this response as it
4 acquires additional information through this litigation and the discovery process.

5 **SPECIAL INTERROGATORY NO. 5:**

6 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

7 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

8 Objection. This interrogatory is not full and complete in and of itself. It includes
9 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
10 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
11 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
12 of admissible evidence. Subject to and without waiving said objections, Responding Party
13 responds as follows: Excel.

14 Discovery is ongoing and incomplete and Responding Party's responses are based on his
15 resent knowledge and belief. Responding Party reserves the right to update this response as it
16 acquires additional information through this litigation and the discovery process.

17 **SPECIAL INTERROGATORY NO. 6:**

18 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
19 temporarily.

20 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

21 Objection. This interrogatory is not full and complete in and of itself. It includes
22 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
23 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
24 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
25 of admissible evidence. Subject to and without waiving said objections, Responding Party
26 responds as follows: None.

27 Discovery is ongoing and incomplete and Responding Party's responses are based on his
28 present knowledge and belief. Responding Party reserves the right to update this response as it

1 acquires additional information through this litigation and the discovery process.

2 **SPECIAL INTERROGATORY NO. 7:**

3 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
4 temporarily.

5 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

6 Objection. This interrogatory is not full and complete in and of itself. It includes
7 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
8 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
9 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
10 of admissible evidence. Subject to and without waiving said objections, Responding Party
11 responds as follows: None.

12 Discovery is ongoing and incomplete and Responding Party's responses are based on his
13 present knowledge and belief. Responding Party reserves the right to update this response as it
14 acquires additional information through this litigation and the discovery process.

15
16 Dated: February 5, 2018

AUSTIN LEGAL GROUP, APC

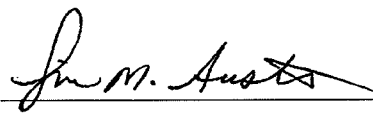
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18 By: 
19 Gina M. Austin/Tamara M. Leetham
20 Attorneys for PLPCC
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EXHIBIT J

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6 Attorneys for Defendants
Point Loma Patients Consumer Cooperative,
7 Golden State Greens, LLC, Far West Management, LLC
Far West Operating, LLC, and Far West Staffing, LLC

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

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **COUNTY OF SAN DIEGO**

16 KARL BECK, individually and on behalf
17 of all other similarly situated California
residents,

18 Plaintiff,

19 vs.

20 POINT LOMA PATIENTS CONSUMER
21 COOPERATIVE CORPORATION, a
California corporation, ADAM KNOPF, an
22 individual, JUSTUS H. HENKES IV, an
individual, 419 CONSULTING INC, a
23 California corporation, GOLDEN STATE
GREENS LLC, a California LLC, FAR
24 WEST MANAGEMENT LLC, a
California LLC, FAR WEST
25 OPERATING, LLC, a California LLC,
FAR WEST STAFFING LLC, a California
26 LLC, and DOES 1-50;

27 Defendants.
28

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

**DEFENDANT KNOPF'S RESPONSES TO
PLAINTIFF'S SPECIAL
INTERROGATORIES (SET ONE)**

Judge: Hon. Joel Wohlfeil
Dept.: 73

Complaint Filed: October 6, 2017
Trial Date: Not Set

1 **PROPOUNDING PARTY:** Plaintiff KARL BECK

2 **RESPONDING PARTY:** Defendant ADAM KNOPF

3 **SET NUMBER:** One (1)

4 Defendant ADAM KNOPF (“Responding Party” or “Defendant”) submits the following
5 responses to Special Interrogatories, Set One, propounded by plaintiff KARL BECK
6 (“Propounding Party” or “Plaintiff”).

7 **RESPONSES TO SPECIAL INTERROGATORIES**

8 Special Interrogatory No. 1:

9 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes
10 of this Interrogatory, means to provide the following information:

- 11 (a) Brand;
12 (b) Model; and
13 (c) Serial or other identification number;

14 Response to Special Interrogatory No. 1:

15 Objection. This interrogatory is not full and complete in and of itself. It includes
16 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
17 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
18 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
19 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
20 admissible evidence. Subject to and without waiving said objections, Responding Party
21 responds as follows: Macbook laptop; HP desktop.

22 Special Interrogatory No. 2:

23 Please identify all persons that have accessed or used, at any time, each
24 COMPUTER identified in response to Special Interrogatory 1. Identify, for purposes of this
25 Interrogatory, means to provide the following information:

- 26 (a) Name;
27 (b) Address;
28 (c) Telephone number; and

1 (d) The specific COMPUTERS such person accessed.

2 Response to Special Interrogatory No. 2:

3 Objection. This interrogatory is not full and complete in and of itself. It includes
4 capitalized terms without definitions within the interrogatory. Cal. Code Civ. Proc. §
5 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This
6 interrogatory also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The
7 interrogatory also calls for information that is neither relevant nor reasonably calculated to lead
8 to the discovery of admissible evidence. Subject to and without waiving said objections,
9 Responding Party responds as follows: Adam Knopf.

10 Special Interrogatory No. 3:

11 Please identify the custodian of each COMPUTER identified in response to
12 Special Interrogatory 1.

13 Response to Special Interrogatory No. 3:

14 Objection. This interrogatory is not full and complete in and of itself. It includes
15 capitalized terms without definitions within the interrogatory. Cal. Code Civ. Proc. §
16 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
17 also calls for information that is neither relevant nor reasonably calculated to lead to the
18 discovery of admissible evidence. Subject to and without waiving said objections,
19 Responding Party responds as follows: Adam Knopf.

20 Special Interrogatory No. 4:

21 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
22 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
23 the following information:

- 24 (a) Brand;
25 (b) Software name;
26 (c) Version number;
27 (d) Serial number or product code;

28 Response to Special Interrogatory No. 4:

1 Objection. This interrogatory is not full and complete in and of itself. It includes
2 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
3 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This
4 interrogatory also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The
5 interrogatory also calls for information that is neither relevant nor reasonably calculated to lead
6 to the discovery of admissible evidence. Subject to and without waiving said objections,
7 Responding Party responds as follows: standard software that came with the computer; 420
8 Soft; Excel.

9 Special Interrogatory No. 5:

10 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

11 Response to Special Interrogatory No. 5

12 Objection. This interrogatory is not full and complete in and of itself. It includes
13 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
14 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
15 also calls for information that is neither relevant nor reasonably calculated to lead to the
16 discovery of admissible evidence. Subject to and without waiving said objections,
17 Responding Party responds as follows: Excel.

18 Special Interrogatory No. 6:

19 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
20 temporarily.

21 Response to Special Interrogatory No. 6:

22 Objection. This interrogatory is not full and complete in and of itself. It includes
23 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
24 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The
25 interrogatory also calls for information that is neither relevant nor reasonably calculated to lead
26 to the discovery of admissible evidence. Subject to and without waiving said objections,
27 Responding Party responds as follows: None.

28 Special Interrogatory No. 7:

1 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
2 Temporarily.

3 Response to Special Interrogatory No. 7

4 Objection. This interrogatory is not full and complete in and of itself. It includes
5 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
6 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
7 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
8 of admissible evidence. Subject to and without waiving said objections, Responding Party
9 responds as follows: None.

10
11 Dated: February 5, 2018



12
13
14 By

A handwritten signature in black ink, appearing to read "M. B. Dart", written over a horizontal line.

15 MATTHEW B. DART
16 Attorneys for Defendants
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EXHIBIT K

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6 Attorneys for Defendants
Point Loma Patients Consumer Cooperative,
7 Golden State Greens, LLC, Far West Management, LLC
Far West Operating, LLC, and Far West Staffing, LLC

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

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **COUNTY OF SAN DIEGO**

15
16 KARL BECK, individually and on behalf
17 of all other similarly situated California
residents,

18 Plaintiff,

19 vs.

20 POINT LOMA PATIENTS CONSUMER
21 COOPERATIVE CORPORATION, a
California corporation, ADAM KNOPF, an
22 individual, JUSTUS H. HENKES IV, an
individual, 419 CONSULTING INC, a
23 California corporation, GOLDEN STATE
GREENS LLC, a California LLC, FAR
24 WEST MANAGEMENT LLC, a
California LLC, FAR WEST
25 OPERATING, LLC, a California LLC,
FAR WEST STAFFING LLC, a California
26 LLC, and DOES 1-50;

27 Defendants.
28

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

**DEFENDANT HENKES' RESPONSES TO
PLAINTIFF'S SPECIAL
INTERROGATORIES (SET ONE)**

Judge: Hon. Joel Wohlfeil
Dept.: 73

Complaint Filed: October 6, 2017
Trial Date: Not Set

1 **PROPOUNDING PARTY:** Plaintiff KARL BECK

2 **RESPONDING PARTY:** Defendant JUSTUS HENKES IV

3 **SET NUMBER:** One (1)

4 Defendant JUSTUS HENKES IV (“Responding Party” or “Defendant”) submits the
5 following responses to Special Interrogatories, Set One, propounded by plaintiff KARL BECK
6 (“Propounding Party” or “Plaintiff”).

7 **RESPONSES TO SPECIAL INTERROGATORIES**

8 **Special Interrogatory No. 1:**

9 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes
10 of this Interrogatory, means to provide the following information:

- 11 (a) Brand;
12 (b) Model; and
13 (c) Serial or other identification number;

14 **Response to Special Interrogatory No. 1:**

15 Objection. This interrogatory is not full and complete in and of itself. It includes
16 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
17 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
18 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
19 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
20 admissible evidence. Subject to and without waiving said objections, Responding Party
21 responds as follows: two MacBook Pro laptops; two HP Pavilion laptops.

22 **Special Interrogatory No. 2:**

23 Please identify all persons that have accessed or used, at any time, each
24 COMPUTER identified in response to Special Interrogatory 1. Identify, for purposes of this
25 Interrogatory, means to provide the following information:

- 26 (a) Name;
27 (b) Address;
28 (c) Telephone number; and

1 (d) The specific COMPUTERS such person accessed.

2 Response to Special Interrogatory No. 2:

3 Objection. This interrogatory is not full and complete in and of itself. It includes
4 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
5 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This
6 interrogatory also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The
7 interrogatory also calls for information that is neither relevant nor reasonably calculated to lead
8 to the discovery of admissible evidence. Subject to and without waiving said objections,
9 Responding Party responds as follows: Justus Henkes, Eden Hagos.

10 Special Interrogatory No. 3:

11 Please identify the custodian of each COMPUTER identified in response to
12 Special Interrogatory 1.

13 Response to Special Interrogatory No. 3:

14 Objection. This interrogatory is not full and complete in and of itself. It includes
15 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
16 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
17 also calls for information that is neither relevant nor reasonably calculated to lead to the
18 discovery of admissible evidence. Subject to and without waiving said objections,
19 Responding Party responds as follows: Justus Henkes.

20 Special Interrogatory No. 4:

21 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
22 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
23 the following information:

- 24 (a) Brand;
25 (b) Software name;
26 (c) Version number;
27 (d) Serial number or product code;

28 Response to Special Interrogatory No. 4:

1 Objection. This interrogatory is not full and complete in and of itself. It includes
2 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
3 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This
4 interrogatory also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The
5 interrogatory also calls for information that is neither relevant nor reasonably calculated to lead
6 to the discovery of admissible evidence. Subject to and without waiving said objections,
7 Responding Party responds as follows: standard software that came with the computer;
8 QuickBooks Enterprise Solutions; 420 Soft; Sales Force; Excel; Word; Google Docs;
9 Dropbox.

10 Special Interrogatory No. 5:

11 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

12 Response to Special Interrogatory No. 5

13 Objection. This interrogatory is not full and complete in and of itself. It includes
14 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
15 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
16 also calls for information that is neither relevant nor reasonably calculated to lead to the
17 discovery of admissible evidence. Subject to and without waiving said objections,
18 Responding Party responds as follows: Excel.

19 Special Interrogatory No. 6:

20 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
21 temporarily.

22 Response to Special Interrogatory No. 6:

23 Objection. This interrogatory is not full and complete in and of itself. It includes
24 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
25 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The
26 interrogatory also calls for information that is neither relevant nor reasonably calculated to lead
27 to the discovery of admissible evidence. Subject to and without waiving said objections,
28 Responding Party responds as follows: None.

1 Special Interrogatory No. 7:

2 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
3 Temporarily.

4 Response to Special Interrogatory No. 7

5 Objection. This interrogatory is not full and complete in and of itself. It includes
6 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
7 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
8 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
9 of admissible evidence. Subject to and without waiving said objections, Responding Party
10 responds as follows: None.

11
12 Dated: February 5, 2018




13
14 
15 By _____
16 MATTHEW B. DART
17 Attorneys for Defendants
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EXHIBIT L

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5 Facsimile: (619) 881-0045

6 Attorneys for Defendants
Point Loma Patients Consumer Cooperative,
7 Golden State Greens, LLC, Far West Management, LLC
Far West Operating, LLC, and Far West Staffing, LLC

8 MATTHEW B. DART (Bar No. 216429)

9 **DART LAW**
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12 Attorneys for Defendants 419 Consulting,
Adam Knopf, and Justus Henkes IV

13 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
14 **COUNTY OF SAN DIEGO**

16 KARL BECK, individually and on behalf
17 of all other similarly situated California
residents,

18 Plaintiff,

19 vs.

20 POINT LOMA PATIENTS CONSUMER
21 COOPERATIVE CORPORATION, a
California corporation, ADAM KNOPF, an
22 individual, JUSTUS H. HENKES IV, an
individual, 419 CONSULTING INC, a
23 California corporation, GOLDEN STATE
GREENS LLC, a California LLC, FAR
24 WEST MANAGEMENT LLC, a
California LLC, FAR WEST
25 OPERATING, LLC, a California LLC,
FAR WEST STAFFING LLC, a California
26 LLC, and DOES 1-50;

27 Defendants.
28

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

**DEFENDANT 419 CONSULTING, INC.'S
RESPONSES TO PLAINTIFF'S SPECIAL
INTERROGATORIES (SET ONE)**

Judge: Hon. Joel Wohlfeil
Dept.: 73

Complaint Filed: October 6, 2017
Trial Date: Not Set

1 **PROPOUNDING PARTY:** Plaintiff KARL BECK

2 **RESPONDING PARTY:** Defendant 419 CONSULTING, INC.

3 **SET NUMBER:** One (1)

4 Defendant 419 CONSULTING, INC. ("Responding Party" or "Defendant") submits the
5 following responses to Special Interrogatories, Set One, propounded by plaintiff KARL BECK
6 ("Propounding Party" or "Plaintiff").

7 **RESPONSES TO SPECIAL INTERROGATORIES**

8 **Special Interrogatory No. 1:**

9 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes
10 of this Interrogatory, means to provide the following information:

- 11 (a) Brand;
12 (b) Model; and
13 (c) Serial or other identification number;

14 **Response to Special Interrogatory No. 1:**

15 Objection. This interrogatory is not full and complete in and of itself. It includes
16 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
17 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
18 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
19 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
20 admissible evidence. Subject to and without waiving said objections, Responding Party
21 responds as follows: MacBook laptop.

22 **Special Interrogatory No. 2:**

23 Please identify all persons that have accessed or used, at any time, each
24 COMPUTER identified in response to Special Interrogatory 1. Identify, for purposes of this
25 Interrogatory, means to provide the following information:

- 26 (a) Name;
27 (b) Address;
28 (c) Telephone number; and

1 (d)The specific COMPUTERS such person accessed.

2 Response to Special Interrogatory No. 2:

3 Objection. This interrogatory is not full and complete in and of itself. It includes
4 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
5 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This
6 interrogatory also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The
7 interrogatory also calls for information that is neither relevant nor reasonably calculated to lead
8 to the discovery of admissible evidence. Subject to and without waiving said objections,
9 Responding Party responds as follows: Adam Knopf.

10 Special Interrogatory No. 3:

11 Please identify the custodian of each COMPUTER identified in response to
12 Special Interrogatory 1.

13 Response to Special Interrogatory No. 3:

14 Objection. This interrogatory is not full and complete in and of itself. It includes
15 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
16 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
17 also calls for information that is neither relevant nor reasonably calculated to lead to the
18 discovery of admissible evidence. Subject to and without waiving said objections,
19 Responding Party responds as follows: Adam Knopf.

20 Special Interrogatory No. 4:

21 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
22 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
23 the following information:

- 24 (a) Brand;
25 (b) Software name;
26 (c) Version number;
27 (d) Serial number or product code;

28 Response to Special Interrogatory No. 4:

1 Objection. This interrogatory is not full and complete in and of itself. It includes
2 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
3 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This
4 interrogatory also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The
5 interrogatory also calls for information that is neither relevant nor reasonably calculated to lead
6 to the discovery of admissible evidence. Subject to and without waiving said objections,
7 Responding Party responds as follows: standard software that came with the computer; 420
8 Soft; Excel.

9 Special Interrogatory No. 5:

10 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

11 Response to Special Interrogatory No. 5

12 Objection. This interrogatory is not full and complete in and of itself. It includes
13 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
14 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
15 also calls for information that is neither relevant nor reasonably calculated to lead to the
16 discovery of admissible evidence. Subject to and without waiving said objections,
17 Responding Party responds as follows: Excel.

18 Special Interrogatory No. 6:

19 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
20 temporarily.

21 Response to Special Interrogatory No. 6:

22 Objection. This interrogatory is not full and complete in and of itself. It includes
23 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
24 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The
25 interrogatory also calls for information that is neither relevant nor reasonably calculated to lead
26 to the discovery of admissible evidence. Subject to and without waiving said objections,
27 Responding Party responds as follows: None.

28 Special Interrogatory No. 7:

1 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
2 Temporarily.

3 Response to Special Interrogatory No. 7

4 Objection. This interrogatory is not full and complete in and of itself. It includes
5 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
6 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
7 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
8 of admissible evidence. Subject to and without waiving said objections, Responding Party
9 responds as follows: None.

10
11 Dated: February 5, 2018



12
13
14 By _____

MATTHEW B. DART
Attorneys for Defendants

EXHIBIT M

1 Gina M. Austin (SBN 246833)
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Far West Operating, LLC, and Far West Staffing, LLC
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12 Attorneys for Defendants 419 Consulting,
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14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
COUNTY OF SAN DIEGO- CENTRAL DIVISION

16 KARL BECK, individually and on behalf
of all similarly situated California
17 residents,

18 Plaintiff,

19 v.

20 POINT LOMA PATIENTS CONSUMER
COOPERATIVE CORPORATION, a
21 California corporation, ADAM KNOPF,
an individual, JUSTUS H. HENKES IV,
22 an individual, 419 CONSULTING INC, a
California corporation, GOLDEN STATE
23 GREENS LLC, a California LLC, FAR
WEST MANAGEMENT LLC, a
24 California LLC, FAR WEST
OPERATING, LLC, a California LLC,
25 FAR WEST STAFFING LLC, a California
LLC, and DOES 1-50;

26 Defendants.
27

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

**DEFENDANT GOLDEN STATE
GREENS, LLC RESPONSES TO
SPECIAL INTERROGATORIES [SET ONE]
PROPOUNDED BY KARL BECK**

1 **PROPOUNDING PARTY:** Plaintiff KARL BECK

2 **RESPONDING PARTY:** Defendant GOLDEN STATE GREENS, LLC

3 **SET NUMBER:** One (1)

4 Defendant GOLDEN STATE GREENS, LLC (“Responding Party” or “Defendant”)
5 submits the following responses to Special Interrogatories, Set One, propounded by plaintiff
6 KARL BECK (“Propounding Party” or “Plaintiff”).

7 **RESPONSES TO SPECIAL INTERROGATORIES**

8 **SPECIAL INTERROGATORY NO. 1:**

9 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes of this
10 Interrogatory, means to provide the following information:

- 11 (a) Brand;
- 12 (b) Model; and
- 13 (c) Serial or other identification number;

14 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

15 Objection. This interrogatory is not full and complete in and of itself. It includes
16 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
17 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
18 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
19 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
20 admissible evidence. This interrogatory is also unduly burdensome and oppressive. Subject to
21 and without waiving said objections, Responding Party responds as follows: two HP Pavilion
22 laptops.

23 Discovery is ongoing and incomplete and Responding Party’s responses are based on his
24 present knowledge and belief. Responding Party reserves the right to update this response as it
25 acquires additional information through this litigation and the discovery process.

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1 **SPECIAL INTERROGATORY NO. 2:**

2 Please identify all persons that have accessed or used, at any time, each COMPUTER
3 identified in response to Special Interrogatory 1. Identify for purposes of this Interrogatory,
4 means to provide the following information:

- 5 (a) Name;
6 (b) Address;
7 (c) Telephone number; and
8 (d) The specific COMPUTERS such person accessed.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

10 Objection. This interrogatory is not full and complete in and of itself. It includes
11 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
12 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
13 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
14 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
15 admissible evidence. Subject to and without waiving said objections, Responding Party
16 responds as follows: Justus Henkes, Eden Hagos.

17 Discovery is ongoing and incomplete and Responding Party's responses are based on his
18 present knowledge and belief. Responding Party reserves the right to update this response as it
19 acquires additional information through this litigation and the discovery process.

20 **SPECIAL INTERROGATORY NO. 3:**

21 Please identify the custodian of each COMPUTER identified in response to Special
22 Interrogatory 1.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

24 Objection. This interrogatory is not full and complete in and of itself. It includes
25 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
26 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
27 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
28 of admissible evidence. Subject to and without waiving said objections, Responding Party

1 responds as follows: Justus Henkes

2 Discovery is ongoing and incomplete and Responding Party's responses are based on his
3 present knowledge and belief. Responding Party reserves the right to update this response as it
4 acquires additional information through this litigation and the discovery process.

5 **SPECIAL INTERROGATORY NO. 4:**

6 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
7 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
8 the following information:

- 9 (a) Brand;
10 (b) Software name;
11 (c) Version number;
12 (d) Serial number or product code;

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

14 Objection. This interrogatory is not full and complete in and of itself. It includes
15 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
16 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
17 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
18 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
19 admissible evidence. Subject to and without waiving said objections, Responding Party
20 responds as follows: standard software that came with the computer; QuickBooks Enterprise
21 Solutions; 420 Soft; Sales Force; Excel; Word; Google Docs; Dropbox.

22 Discovery is ongoing and incomplete and Responding Party's responses are based on his
23 present knowledge and belief. Responding Party reserves the right to update this response as it
24 acquires additional information through this litigation and the discovery process.

25 **SPECIAL INTERROGATORY NO. 5:**

26 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

28 Objection. This interrogatory is not full and complete in and of itself. It includes

1 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
2 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
3 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
4 of admissible evidence. Subject to and without waiving said objections, Responding Party
5 responds as follows: Excel.

6 Discovery is ongoing and incomplete and Responding Party's responses are based on his
7 resent knowledge and belief. Responding Party reserves the right to update this response as it
8 acquires additional information through this litigation and the discovery process.

9 **SPECIAL INTERROGATORY NO. 6:**

10 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
11 temporarily.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

13 Objection. This interrogatory is not full and complete in and of itself. It includes
14 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
15 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
16 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
17 of admissible evidence. Subject to and without waiving said objections, Responding Party
18 responds as follows: None:

19 Discovery is ongoing and incomplete and Responding Party's responses are based on his
20 present knowledge and belief. Responding Party reserves the right to update this response as it
21 acquires additional information through this litigation and the discovery process.

22 **SPECIAL INTERROGATORY NO. 7:**

23 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
24 temporarily.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

26 Objection. This interrogatory is not full and complete in and of itself. It includes
27 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
28 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory

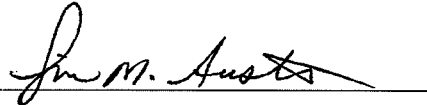
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also calls for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving said objections, Responding Party responds as follows: None.

Discovery is ongoing and incomplete and Responding Party's responses are based on his present knowledge and belief. Responding Party reserves the right to update this response as it acquires additional information through this litigation and the discovery process.

Dated: February 5, 2018

AUSTIN LEGAL GROUP, APC

By: 

Gina M. Austin/Tamara M. Leetham
Attorneys for Golden State Greens, LLC

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14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
COUNTY OF SAN DIEGO- CENTRAL DIVISION

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

17 Plaintiff,

18 v.

19 POINT LOMA PATIENTS CONSUMER
20 COOPERATIVE CORPORATION, a
California corporation, ADAM KNOPF,
21 an individual, JUSTUS H. HENKES IV,
an individual, 419 CONSULTING INC, a
22 California corporation, GOLDEN STATE
GREENS LLC, a California LLC, FAR
23 WEST MANAGEMENT LLC, a
California LLC, FAR WEST
24 OPERATING, LLC, a California LLC,
FAR WEST STAFFING LLC, a California
25 LLC, and DOES 1-50;

26 Defendants.
27
28

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

**DEFENDANT FAR WEST
MANAGEMENT, LLC RESPONSES TO
SPECIAL INTERROGATORIES [SET ONE]
PROPOUNDED BY KARL BECK**

1 **PROPOUNDING PARTY:** Plaintiff KARL BECK

2 **RESPONDING PARTY:** Defendant FAR WEST MANAGEMENT, LLC

3 **SET NUMBER:** One (1)

4
5 Defendant FAR WEST MANAGEMENT, LLC (“Responding Party” or “Defendant”)
6 submits the following responses to Special Interrogatories, Set One, propounded by plaintiff
7 KARL BECK (“Propounding Party” or “Plaintiff”).

8
9 **RESPONSES TO SPECIAL INTERROGATORIES**

10 **SPECIAL INTERROGATORY NO. 1:**

11 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes of this
12 Interrogatory, means to provide the following information:

- 13 (a) Brand;
14 (b) Model; and
15 (c) Serial or other identification number;

16 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

17 Objection. This interrogatory is not full and complete in and of itself. It includes
18 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
19 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
20 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
21 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
22 admissible evidence. This interrogatory is also unduly burdensome and oppressive. Subject to
23 and without waiving said objections, Responding Party responds as follows: two HP Pavilion
24 laptops.

25 Discovery is ongoing and incomplete and Responding Party’s responses are based on his
26 present knowledge and belief. Responding Party reserves the right to update this response as it
27 acquires additional information through this litigation and the discovery process.

1 **SPECIAL INTERROGATORY NO. 2:**

2 Please identify all persons that have accessed or used, at any time, each COMPUTER
3 identified in response to Special Interrogatory 1. Identify for purposes of this Interrogatory,
4 means to provide the following information:

- 5 (a) Name;
6 (b) Address;
7 (c) Telephone number; and
8 (d) The specific COMPUTERS such person accessed.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

10 Objection. This interrogatory is not full and complete in and of itself. It includes
11 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
12 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
13 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
14 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
15 admissible evidence. Subject to and without waiving said objections, Responding Party
16 responds as follows: Justus Henkes, Eden Hagos.

17 Discovery is ongoing and incomplete and Responding Party's responses are based on his
18 present knowledge and belief. Responding Party reserves the right to update this response as it
19 acquires additional information through this litigation and the discovery process.

20 **SPECIAL INTERROGATORY NO. 3:**

21 Please identify the custodian of each COMPUTER identified in response to Special
22 Interrogatory 1.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

24 Objection. This interrogatory is not full and complete in and of itself. It includes
25 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
26 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
27 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
28 of admissible evidence. Subject to and without waiving said objections, Responding Party

1 responds as follows: Justus Henkes.

2 Discovery is ongoing and incomplete and Responding Party's responses are based on his
3 present knowledge and belief. Responding Party reserves the right to update this response as it
4 acquires additional information through this litigation and the discovery process.

5 **SPECIAL INTERROGATORY NO. 4:**

6 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
7 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
8 the following information:

- 9 (a) Brand;
10 (b) Software name;
11 (c) Version number;
12 (d) Serial number or product code;

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

14 Objection. This interrogatory is not full and complete in and of itself. It includes
15 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
16 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
17 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
18 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
19 admissible evidence. Subject to and without waiving said objections, Responding Party
20 responds as follows: standard software that came with the computer; QuickBooks Enterprise
21 Solutions; 420 Soft; Sales Force; Excel; Word; Google Docs; Dropbox.

22 Discovery is ongoing and incomplete and Responding Party's responses are based on his
23 present knowledge and belief. Responding Party reserves the right to update this response as it
24 acquires additional information through this litigation and the discovery process.

25 **SPECIAL INTERROGATORY NO. 5:**

26 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

28 Objection. This interrogatory is not full and complete in and of itself. It includes capitalized

1 terms without definitions within the interrogatory. Cal. Code. Civ. Proc. § 2030.060(d). This set
2 also improperly includes a preface and instructions. *Id.* The interrogatory also calls for
3 information that is neither relevant nor reasonably calculated to lead to the discovery of
4 admissible evidence. Subject to and without waiving said objections, Responding Party
5 responds as follows: Excel.

6 Discovery is ongoing and incomplete and Responding Party's responses are based on his
7 present knowledge and belief. Responding Party reserves the right to update this response as it
8 acquires additional information through this litigation and the discovery process.

9 **SPECIAL INTERROGATORY NO. 6:**

10 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
11 temporarily.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

13 Objection. This interrogatory is not full and complete in and of itself. It includes
14 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
15 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
16 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
17 of admissible evidence. Subject to and without waiving said objections, Responding Party
18 responds as follows: None:

19 Discovery is ongoing and incomplete and Responding Party's responses are based on his
20 present knowledge and belief. Responding Party reserves the right to update this response as it
21 acquires additional information through this litigation and the discovery process.

22 **SPECIAL INTERROGATORY NO. 7:**

23 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
24 temporarily.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

26 Objection. This interrogatory is not full and complete in and of itself. It includes
27 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
28 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory

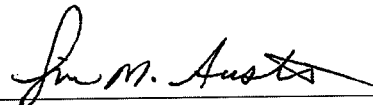
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also calls for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving said objections, Responding Party responds as follows: None.

Discovery is ongoing and incomplete and Responding Party's responses are based on his present knowledge and belief. Responding Party reserves the right to update this response as it acquires additional information through this litigation and the discovery process.

Dated: February 5, 2018

AUSTIN LEGAL GROUP, APC

By: 

Gina M. Austin/Tamara M. Leetham
Attorneys for Far West Management, LLC

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COUNTY OF SAN DIEGO- CENTRAL DIVISION

16 **KARL BECK**, individually and on behalf
of all similarly situated California residents,

17 Plaintiff,

18 v.

19 POINT LOMA PATIENTS CONSUMER
20 COOPERATIVE CORPORATION, a
California corporation, ADAM KNOPF, an
21 individual, JUSTUS H. HENKES IV, an
individual, 419 CONSULTING INC, a
22 California corporation, GOLDEN STATE
GREENS LLC, a California LLC, FAR
23 WEST MANAGEMENT LLC, a California
LLC, FAR WEST OPERATING, LLC, a
24 California LLC, FAR WEST STAFFING
LLC, a California LLC, and DOES 1-50;

25 Defendants.
26

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

**DEFENDANT FAR WEST
OPERATING, LLC RESPONSES TO
SPECIAL INTERROGATORIES [SET ONE]
PROPOUNDED BY KARL BECK**

AUSTIN LEGAL GROUP, APC
3990 Old Town Ave, Ste A-112
San Diego, CA 92110

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PROPOUNDING PARTY: Plaintiff KARL BECK

RESPONDING PARTY: Defendant FAR WEST OPERATING, LLC

SET NUMBER: One (1)

Defendant FAR WEST OPERATING, LLC (“Responding Party” or “Defendant”) submits the following responses to Special Interrogatories, Set One, propounded by plaintiff KARL BECK (“Propounding Party” or “Plaintiff”).

RESPONSES TO SPECIAL INTERROGATORIES

SPECIAL INTERROGATORY NO. 1:

Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes of this Interrogatory, means to provide the following information:

- (a) Brand;
- (b) Model; and
- (c) Serial or other identification number;

RESPONSE TO SPECIAL INTERROGATORY NO. 1:

Objection. This interrogatory is not full and complete in and of itself. It includes capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. § 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also calls for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. This interrogatory is also unduly burdensome and oppressive. Subject to and without waiving said objections, Responding Party responds as follows: two HP Pavilion laptops.

Discovery is ongoing and incomplete and Responding Party’s responses are based on his present knowledge and belief. Responding Party reserves the right to update this response as it acquires additional information through this litigation and the discovery process.

1 **SPECIAL INTERROGATORY NO. 2:**

2 Please identify all persons that have accessed or used, at any time, each COMPUTER
3 identified in response to Special Interrogatory 1. Identify for purposes of this Interrogatory,
4 means to provide the following information:

- 5 (a) Name;
6 (b) Address;
7 (c) Telephone number; and
8 (d) The specific COMPUTERS such person accessed.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

10 Objection. This interrogatory is not full and complete in and of itself. It includes
11 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
12 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
13 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
14 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
15 admissible evidence. Subject to and without waiving said objections, Responding Party
16 responds as follows: Justus Henkes, Eden Hagos.

17 Discovery is ongoing and incomplete and Responding Party's responses are based on his
18 present knowledge and belief. Responding Party reserves the right to update this response as it
19 acquires additional information through this litigation and the discovery process.

20 **SPECIAL INTERROGATORY NO. 3:**

21 Please identify the custodian of each COMPUTER identified in response to Special
22 Interrogatory 1.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

24 Objection. This interrogatory is not full and complete in and of itself. It includes
25 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
26 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
27 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
28 of admissible evidence. Subject to and without waiving said objections, Responding Party

1 responds as follows: Justus Henkes

2 Discovery is ongoing and incomplete and Responding Party's responses are based on his
3 present knowledge and belief. Responding Party reserves the right to update this response as it
4 acquires additional information through this litigation and the discovery process.

5 **SPECIAL INTERROGATORY NO. 4:**

6 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
7 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
8 the following information:

- 9 (a) Brand;
10 (b) Software name;
11 (c) Version number;
12 (d) Serial number or product code;

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

14 Objection. This interrogatory is not full and complete in and of itself. It includes
15 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
16 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
17 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
18 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
19 admissible evidence. Subject to and without waiving said objections, Responding Party
20 responds as follows: standard software that came with the computer; QuickBooks Enterprise
21 Solutions; 420 Soft; Sales Force; Excel; Word; Google Docs; Dropbox.

22 Discovery is ongoing and incomplete and Responding Party's responses are based on his
23 present knowledge and belief. Responding Party reserves the right to update this response as it
24 acquires additional information through this litigation and the discovery process.

25 **SPECIAL INTERROGATORY NO. 5:**

26 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

28 Objection. This interrogatory is not full and complete in and of itself. It includes

1 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
2 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
3 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
4 of admissible evidence. Subject to and without waiving said objections, Responding Party
5 responds as follows: Excel.

6 Discovery is ongoing and incomplete and Responding Party's responses are based on his
7 resent knowledge and belief. Responding Party reserves the right to update this response as it
8 acquires additional information through this litigation and the discovery process.

9 **SPECIAL INTERROGATORY NO. 6:**

10 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
11 temporarily.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

13 Objection. This interrogatory is not full and complete in and of itself. It includes
14 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
15 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
16 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
17 of admissible evidence. Subject to and without waiving said objections, Responding Party
18 responds as follows: None:

19 Discovery is ongoing and incomplete and Responding Party's responses are based on his
20 present knowledge and belief. Responding Party reserves the right to update this response as it
21 acquires additional information through this litigation and the discovery process.

22 **SPECIAL INTERROGATORY NO. 7:**

23 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
24 temporarily.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

26 Objection. This interrogatory is not full and complete in and of itself. It includes
27 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
28 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory

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also calls for information that is neither relevant nor reasonably calculated to lead to the discovery of admissible evidence. Subject to and without waiving said objections, Responding Party responds as follows: None.

Discovery is ongoing and incomplete and Responding Party's responses are based on his present knowledge and belief. Responding Party reserves the right to update this response as it acquires additional information through this litigation and the discovery process.

Dated: February 5, 2018

AUSTIN LEGAL GROUP, APC

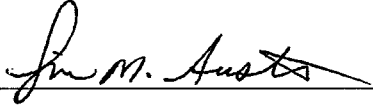
By: 
Gina M. Austin/Tamara M. Leetham
Attorneys for Far West Operating, LLC

EXHIBIT P

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2 Tamara M. Leetham (SBN 234419)
E-mail: tamara@austinlegalgroup.com
3 AUSTIN LEGAL GROUP, APC
3990 Old Town Ave, Ste A-112
4 San Diego, CA 92110
Phone: (619) 924-9600
5 Facsimile: (619) 881-0045

6 Attorneys for Defendants
Point Loma Patients Consumer Cooperative,
7 Golden State Greens, LLC, Far West Management, LLC
Far West Operating, LLC, and Far West Staffing, LLC
8

9 MATTHEW B. DART (Bar No. 216429)
DART LAW
12526 High Bluff Dr., Suite 300
10 San Diego, CA 92101
Tel: 858.792.3616
11 Fax: 858.408.2900

12 Attorneys for Defendants 419 Consulting,
Adam Knopf, and Justus Henkes IV
13

14 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
COUNTY OF SAN DIEGO- CENTRAL DIVISION

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

17 Plaintiff,
18 vs.
19

20 POINT LOMA PATIENTS CONSUMER
COOPERATIVE CORPORATION, a
California corporation, ADAM KNOPF,
21 an individual, JUSTUS H. HENKES IV,
an individual, 419 CONSULTING INC, a
22 California corporation, GOLDEN STATE
GREENS LLC, a California LLC, FAR
23 WEST MANAGEMENT LLC, a
California LLC, FAR WEST
24 OPERATING, LLC, a California LLC,
FAR WEST STAFFING LLC, a California
25 LLC, and DOES 1-50;

26 Defendants.
27
28

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

**DEFENDANT FAR WEST
STAFFING, LLC RESPONSES TO
SPECIAL INTERROGATORIES [SET ONE]
PROPOUNDED BY KARL BECK**

1 **PROPOUNDING PARTY:** Plaintiff KARL BECK

2 **RESPONDING PARTY:** Defendant FAR WEST STAFFING, LLC

3 **SET NUMBER:** One (1)

4
5 Defendant FAR WEST STAFFING, LLC (“Responding Party” or “Defendant”) submits
6 the following responses to Special Interrogatories, Set One, propounded by plaintiff KARL
7 BECK (“Propounding Party” or “Plaintiff”).

8
9
10 **RESPONSES TO SPECIAL INTERROGATORIES**

11 **SPECIAL INTERROGATORY NO. 1:**

12 Please identify all COMPUTERS used, at any time, by YOU. Identify, for purposes of this
13 Interrogatory, means to provide the following information:

- 14 (a) Brand;
15 (b) Model; and
16 (c) Serial or other identification number;

17 **RESPONSE TO SPECIAL INTERROGATORY NO. 1:**

18 Objection. This interrogatory is not full and complete in and of itself. It includes
19 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
20 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
21 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
22 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
23 admissible evidence. This interrogatory is also unduly burdensome and oppressive. Subject to
24 and without waiving said objections, Responding Party responds as follows: two HP Pavilion
25 laptops.

26 Discovery is ongoing and incomplete and Responding Party’s responses are based on his
27 present knowledge and belief. Responding Party reserves the right to update this response as it
28 acquires additional information through this litigation and the discovery process.

1 **SPECIAL INTERROGATORY NO. 2:**

2 Please identify all persons that have accessed or used, at any time, each COMPUTER
3 identified in response to Special Interrogatory 1. Identify for purposes of this Interrogatory,
4 means to provide the following information:

- 5 (a) Name;
6 (b) Address;
7 (c) Telephone number; and
8 (d) The specific COMPUTERS such person accessed.

9 **RESPONSE TO SPECIAL INTERROGATORY NO. 2:**

10 Objection. This interrogatory is not full and complete in and of itself. It includes
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15 admissible evidence. Subject to and without waiving said objections, Responding Party
16 responds as follows: Justus Henkes, Eden Hagos.

17 Discovery is ongoing and incomplete and Responding Party's responses are based on his
18 present knowledge and belief. Responding Party reserves the right to update this response as it
19 acquires additional information through this litigation and the discovery process.

20 **SPECIAL INTERROGATORY NO. 3:**

21 Please identify the custodian of each COMPUTER identified in response to Special
22 Interrogatory 1.

23 **RESPONSE TO SPECIAL INTERROGATORY NO. 3:**

24 Objection. This interrogatory is not full and complete in and of itself. It includes
25 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
26 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
27 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
28 of admissible evidence. Subject to and without waiving said objections, Responding Party

1 responds as follows: Justus Henkes.

2 Discovery is ongoing and incomplete and Responding Party's responses are based on his
3 present knowledge and belief. Responding Party reserves the right to update this response as it
4 acquires additional information through this litigation and the discovery process.

5 **SPECIAL INTERROGATORY NO. 4:**

6 Please identify all SOFTWARE installed at any time on each COMPUTER identified in
7 response to Special Interrogatory 1. Identify, for purposes of this Interrogatory, means to provide
8 the following information:

- 9 (a) Brand;
10 (b) Software name;
11 (c) Version number;
12 (d) Serial number or product code;

13 **RESPONSE TO SPECIAL INTERROGATORY NO. 4:**

14 Objection. This interrogatory is not full and complete in and of itself. It includes
15 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
16 2030.060(d). This set also improperly includes a preface and instructions. *Id.* This interrogatory
17 also improperly contains subparts. Cal. Code Civ. Proc. § 2030.060(f). The interrogatory also
18 calls for information that is neither relevant nor reasonably calculated to lead to the discovery of
19 admissible evidence. Subject to and without waiving said objections, Responding Party
20 responds as follows: standard software that came with the computer; QuickBooks Enterprise
21 Solutions; 420 Soft; Sales Force; Excel; Word; Google Docs; Dropbox.

22 Discovery is ongoing and incomplete and Responding Party's responses are based on his
23 present knowledge and belief. Responding Party reserves the right to update this response as it
24 acquires additional information through this litigation and the discovery process.

25 **SPECIAL INTERROGATORY NO. 5:**

26 Please identify all DATABASES used by YOU, at any time, continuously or temporarily.

27 **RESPONSE TO SPECIAL INTERROGATORY NO. 5:**

28 Objection. This interrogatory is not full and complete in and of itself. It includes

1 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
2 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
3 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
4 of admissible evidence. Subject to and without waiving said objections, Responding Party
5 responds as follows: Excel.

6 Discovery is ongoing and incomplete and Responding Party's responses are based on his
7 resent knowledge and belief. Responding Party reserves the right to update this response as it
8 acquires additional information through this litigation and the discovery process.

9 **SPECIAL INTERROGATORY NO. 6:**

10 Please identify all CLOUD repositories of data used by YOU, at any time, continuously or
11 temporarily.

12 **RESPONSE TO SPECIAL INTERROGATORY NO. 6:**

13 Objection. This interrogatory is not full and complete in and of itself. It includes
14 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
15 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory
16 also calls for information that is neither relevant nor reasonably calculated to lead to the discovery
17 of admissible evidence. Subject to and without waiving said objections, Responding Party
18 responds as follows: None.

19 Discovery is ongoing and incomplete and Responding Party's responses are based on his
20 present knowledge and belief. Responding Party reserves the right to update this response as it
21 acquires additional information through this litigation and the discovery process.

22 **SPECIAL INTERROGATORY NO. 7:**

23 Please identify all CLOUD SOFTWARE used by YOU, at any time, continuously or
24 temporarily.

25 **RESPONSE TO SPECIAL INTERROGATORY NO. 7:**

26 Objection. This interrogatory is not full and complete in and of itself. It includes
27 capitalized terms without definitions within the interrogatory. Cal. Code. Civ. Proc. §
28 2030.060(d). This set also improperly includes a preface and instructions. *Id.* The interrogatory

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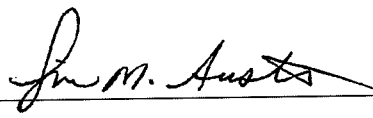
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Discovery is ongoing and incomplete and Responding Party's responses are based on his present knowledge and belief. Responding Party reserves the right to update this response as it acquires additional information through this litigation and the discovery process.

Dated: February 5, 2018

AUSTIN LEGAL GROUP, APC

By: 

Gina M. Austin/Tamara M. Leetham
Attorneys for Far West Staffing, LLC

EXHIBIT Q



March 12, 2018

Via Electronic Mail

Tamara Leetham
AUSTIN LEGAL GROUP, APC
3990 Old Town Ave, Suite A112
San Diego, 92110
tamara@austinlegalgroup.com

Re: Meet and Confer – Plaintiff’s Special Interrogatories to all Defendants (Set One)

Dear Tammy and Matt,

This constitutes Plaintiff’s meet and confer on the above discovery in advance of filing a motion to compel. After you have an opportunity to consider Plaintiff’s position, I propose a call to see if we can come to an accord, or whether motion practice is the only way forward.

I. SPECIAL INTERROGATORIES

Plaintiff’s first set of special interrogatories are a type explicitly contemplated by the Discovery Act. Plaintiff is permitted to obtain discovery of “the identity and location of persons having knowledge of any discoverable matter, as well as of the existence, description, nature, custody, condition, and location of any document [or] electronically stored information” CCP § 2017.010. Thus, we start from the position that Defendants are required to provide full and complete responses to Plaintiff’s attempt to identify repositories of electronically stored information.

a. GENERAL OBJECTIONS

i. Definitions / instructions / Subparts

Defendants object that Plaintiffs’ Interrogatories include definitions and subparts, and that these purportedly violate CCP § 2030.060(d). However, in *Clement v. Alegre* (2009) 177 Cal.App.4th 1277, the Court of Appeal urged parties to take a practical construction, and that generally interrogatories should not be objectionable unless they contain more than one subject matter. *Id.* at 1291-92. The definitions in this case clarify and do not **compound**. Thus, I urge you to reconsider your objections. Regardless, please confirm in writing that Defendants are not withholding responsive information on based on this objection.

A handwritten signature in black ink, appearing to read 'The Restis Law Firm, P.C.', is positioned above a horizontal line.

ii. Burdensome / Oppression

While Plaintiff is understanding of these objections, Defendants have failed to provide any factual basis to support them. Objections should be made with specificity and provide the basis to allow an intelligent response. *See Korea Data Systems Co. Ltd. v. Sup. Ct.* (1997) 51 Cal.App.4th 1513, 1516 (“boiler plate” objections are improper because the CODE OF CIVIL PROC. requires specificity); *W. Pico Furniture Co. v. Sup. Ct.* 56 Cal. 2d 407, 417 (1961) (“The objection based upon burden must be sustained by evidence showing the quantum of work required, while to support an objection of oppression there must be some showing either of an intent to create an unreasonable burden or that the ultimate effect of the burden is incommensurate with the result sought.”)

Moreover, California Courts generally do not sustain such objections to interrogatories. CAL. PRAC. GUIDE: CIV. PRO. BEFORE TRIAL (the Rutter Group 2012) § 8:1077. Undue burden objections are only sustain upon a showing of oppression that would result in injustice. *West Pico Furniture Co. of L.A. v. Sup. Ct.* (1961) 56 C2d 407, 418.

In an attempt at meaningful meet and confer, if Defendant has a factual basis for these objections, please provide it so Plaintiff can consider them whether they raise to the level of oppression or injustice.

iii. Right to Supplement

Under CCP § 2030.220(a)-(b), “[e]ach answer in a response to interrogatories shall be as complete and straightforward as the information reasonably available to the responding party permits” and “[i]f an interrogatory cannot be answered completely, it shall be answered to the extent possible.” If a responding party is unable to obtain the information sought, they must specify why the information is unavailable and what efforts the party made to obtain it. *Deyo v. Kilbourne* (1978) 84 Cal.App.3d 771, 782.

As such, Plaintiff does not agree to allow Defendants to reserve the right make use of information that went undiscovered due to their failure to conduct a good faith and complete investigation at the outset. To allow this reservation would permit the admission of ‘surprise’ evidence, causing unfair burden and delay for both the Plaintiff and the Court. *See R&B Auto Ctr., Inc. v. Farmers Group, Inc.* (2006) 140 Cal.App.4th 327, 357.

Please reconsider this objection so that Plaintiff is not forced to compel a complete and candid response.

iv. Failure to Disclose ESI Repositories / Evasive Responses

As an initial matter, Defendants are required to identify potential repositories of ESI without a discovery request. Cal. R. Ct. 3.724(8); *Wells Fargo Bank, Nat'l Ass'n v. LaSalle Bank Nat'l Ass'n*, 2009 U.S. Dist. LEXIS 70514, at *6 (S.D. Ohio July 24, 2009) (“The Sedona Conference has issued its Cooperation Proclamation to attempt to move litigators in the direction of cooperating by suggesting methods for doing so: ... Exchanging information of relevant data sources, including those not being searched, or scheduling early disclosures on the topic of Electronically Stored Information”); *Brown v. Tellerate Holdings Ltd.*, 2014 U.S. Dist. LEXIS 90123, at *45-46 (S.D. Ohio July 1, 2014) (“Rule 26(f) requires the parties to meet and confer early in the case to discuss, among other matters, ‘any issues about disclosure or discovery of electronically stored information, including the form or forms in which it should be produced....’”); *Parrottino v. Bankers Life & Cas. Co.*, 2014



U.S. Dist. LEXIS 52973, at *18 (E.D. Mich. Apr. 17, 2014) (“parties must be prepared to provide discoverable ESI at the onset of litigation, including its ESI storage format, as well as its document retention and destruction policies.”) (citing cases); *Firefighters' Ret. Sys. v. Citco Grp. Ltd.*, 2018 U.S. Dist. LEXIS 594, at *16-17 (M.D. La. Jan. 3, 2018) (“The Federal Rules of Civil Procedure explicitly direct parties to discuss ‘issues about disclosure, discovery, or preservation of electronically stored information...’ early in the litigation process when making their discovery plan.”); *Mortgage Resolution Servicing, LLC v. JPMorgan Chase Bank, N.A.*, 15 CV 0293, 2017 U.S. Dist. LEXIS 78217, 2017 WL 2305398, at * 2 (S.D.N.Y. May 18, 2017) (“Absent agreement among the parties, then, the responding party is entitled to select the custodians most likely to possess responsive information and to search the files of those individuals.”)

Thus, it is inexcusable for Defendants to fail to identify ESI repositories when *specifically asked*. Defendants have a duty to conduct a good faith investigation to obtain responsive information. See CODE OF CIVIL PROC. § 2030.220(c); *Regency Health Services, Inc. v. Sup. Ct* (1998) 64 Cal. App. 4th 1496, 1504.

Defendants’ responses are not only deficient but also a violation of the discovery rules as they are intentionally evasive. Defendant has a duty to respond in good faith as best it can. *see also* CALIFORNIA CODE OF CIVIL PROCEDURE § 2016.040. Such evasive responses to discovery are grounds for discovery sanctions. *See* CODE OF CIVIL PROCEDURE § 2023.101; § 2023.010(F), and Plaintiff will seek sanctions if forced to waste resources by involving the Court in motion practice.

For example, the PLPCC’s response to Plaintiff’s Request No 1 states that the PLPCC ha “approximately 20 HP desktops, two HP Pavilion laptops.” But Defendant fails to identify them by serial number, etc., as requested to establish a chain of custody with the evidence. These deficiencies will be addressed more specifically below.

v. Lack of Verification

Defendants have failed to provide verifications for their interrogatory responses. This renders the facts stated in the responses untimely. *See Appleton v. Sup. Ct.*, 206 Cal.App.3d 632, 636 (1988). Lack of verification also renders the responses useless as evidence. *See Deyo v. Kilbourne* (1979) 84 Cal.3d 771, 783 (“verification of the answers is in effect a declaration that the party has disclosed all information which is available to him”).

Thus, please provide a verification of Defendants’ responses (and any amended responses) or Plaintiff will be forced to involve the Court.

b. SPECIFIC RESPONSES

i. Srog No. 1 to All Defendants

This Request asked Defendants to identify their computers. This of course is intended to ensure all ESI repositories are known to plaintiff, and to prevent defendants from secreting evidence. Thus, all computers (as defined) must be specifically identified by their serial number.



ii. Srog No. 2 to PLPCC

This request asks the PLPCC to identify who has used what computers and when. This information is necessary to identify chain of custody. The PLPCC responded that “approximately 120 personnel use and access one of more company computers on a regular basis. The specific personnel have changed over the years.”

This response is evasive and reveals a lack of investigation. The PLPCC should respond – at least - as to what personnel used which PLPCC computers. If additional information is available from activity logs, it should be provided. If it is not available, Defendant must so state.

iii. Srog No 4 to All Defendants

None of the Defendants identified their email software. Please amend these responses to include this information, as it is a key source of ESI.

iv. Srog No. 5 to All Defendants

This Interrogatory asks for the identification of databases. Defendants either listed “none” or “excel” in response to this Interrogatory. However, it also listed software like 420soft, quickbooks, salesforce software platforms. Do any of these contain databases of information? If yes, they must be identified.

v. Srogs No. 6 and 7

These interrogatories ask if Defendants use any software of data stored in “the cloud.” The purpose of these requests is to know where to send subpoenas if necessary. Defendants all answered “none.” However, several software platforms were identified such as quickbooks, 420soft, Sales Force, etc. To the extent that software or data from these platforms are not hosted on Defendants computers identified in response to Srog 1, they must be identified.

Thank you for your anticipated cooperation on these issues.

Sincerely,



William R. Restis, Esq.

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

Cc: Jeffrey R. Krinsk, Esq.
Matthew Dart, Esq.

