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9 *Attorneys for Defendants*
10 DAVID CARLSON and FILM FOETUS, INC.

11 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
12 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

13 MICHAL STORY, an Individual,) Case No.: **21STCV29163**
14)
15 Plaintiff,) **HON. THERESA M. TRABER | Dept. 47**
16)
17 v.) **DEFENDANTS DAVID CARLSON AND FILM**
18) **FOETUS, INC.’S RESPONSES AND**
19) **OBJECTIONS TO PLAINTIFF MICHAL**
20) **STORY’S DEMAND FOR IDENTIFICATION**
21) **AND PRODUCTION OF DOCUMENTS**
22) **PROPOUNDED (SET ONE)**
23)
24 DAVID CARLSON, an Individual and)
25) **ACTION FILED: AUGUST 6, 2021**
26) **TRIAL DATE: NONE SET**
27)
28)

PROPOUNDING PARTY: Plaintiff MICHAL STORY

RESPONDING PARTIES: Defendants DAVID CARLSON and FILM FOETUS, INC.

SET NUMBER: ONE

Pursuant to § 2031.010, *et seq.*, of the California *Code of Civil Procedure*, defendants Film Foetus, Inc. (“**Film Foetus**”) and David Carlson (“**Carlson**”) (collectively, “**Defendants**”) hereby respond and object to the requests for production of documents (set one) propounded by plaintiff Michal Story (“**Story**” or “**Plaintiff**”) as follows:

PRELIMINARY STATEMENT

The following responses are rendered and based on information in the possession of the Defendants at the time of the preparation of these answers, after diligent inquiry. Discovery will continue as long as permitted by statute or stipulation of the parties, and the investigation of Defendants’

1 attorneys and agents will continue to and throughout the trial of this action. Defendants therefore
2 specifically reserve the right, at the time of trial, to introduce any evidence from any source, which may
3 hereafter be discovered, and testimony from any witnesses whose identity may hereafter be discovered.
4 This information produced is without prejudice to Defendants' right to produce evidence of any
5 information relating to any subsequently discovered facts and/or documents. If any information has
6 unintentionally been omitted from these responses, Defendants reserve the right to apply for relief so as
7 to permit the insertion of the omitted information. The following responses are given without prejudice
8 to the Defendants' rights to produce evidence of any subsequently discovered fact or facts which
9 Defendants may later recall. Defendants accordingly reserve the right to change any and all responses
10 herein as additional facts are ascertained, analyses are made, legal research is completed and contentions
11 are made.

12 Nothing contained herein is intended to be, or may be construed to be a waiver of the
13 attorney/client privilege, the attorney work product doctrine, or any other applicable privilege. Any
14 inadvertent disclosure of material protected by any such applicable privilege or discovery immunity is
15 not intended to, and should not be construed to constitute a waiver of such privilege or immunity. By
16 these Responses, Defendants do not, and do not intend to: (i) waive any objections as to the
17 admissibility of evidence or the competency of, relevancy of, materiality of, or privilege attaching to any
18 information or documents disclosed through these Responses; or (ii) waive the right to object to other
19 discovery requests or undertakings involving or reflecting the subject matter requested herein. These
20 responses do not constitute, nor should they be construed as, admissions with respect to the relevancy or
21 admissibility of any evidence or document identified herein or the truth or accuracy of any statement,
22 characterization, or other information contained in such documents. Defendants expressly do not
23 concede the relevance or materiality of any of these responses or the subject matter to which they refer.

24 **GENERAL OBJECTIONS**

25 Defendants' discovery, internal investigation, and preparation for the trial of this matter are not
26 completed as of the date of these Responses and are continuing. Defendants anticipate that discovery,
27 internal investigation, and preparation for trial will reveal additional information not presently known to
28 it, but upon which they may rely. Defendants reserve the right to modify or supplement their responses

1 upon completion of their discovery, internal investigation, and preparation for the trial of this matter,
2 and to use at trial, or in any motion or deposition, any documents, facts, or supporting evidence of any
3 sort later developed or discovered.

4 Any responses to these requests provided by Defendants are solely for the purpose of this
5 litigation. Any attempt by Plaintiff or any other person or entity to use or disseminate the Responses, the
6 information contained in the Responses, or the documents produced in this litigation beyond this
7 litigation is objected to as improper.

8 Defendants object to these requests to the extent they seek documents that are neither relevant to
9 the subject matter of the pending action nor reasonably calculated to lead to the discovery of admissible
10 evidence. Defendants object to these requests to the extent they seek documents protected by the
11 attorney-client privilege, the work product doctrine or any other applicable privilege. Defendants object
12 to these requests to the extent they are unreasonably cumulative or duplicative, vague, ambiguous,
13 overly broad, unduly burdensome, or do not specify the documents sought with sufficient particularity.
14 Defendants object to these requests to the extent they: (i) seek documents from persons, companies, or
15 entities other than Defendant, or otherwise not within Defendants' possession, custody or control, and/or
16 (ii) seek documents that are publicly or equally available to Plaintiff. Defendants object to these requests
17 on the grounds that they are improperly propounded upon multiple parties.

18 These general objections shall apply to each and every response given herein and shall be
19 incorporated herein by reference as though fully set forth in each and every following response.

20 **RESPONSES**

21 Notwithstanding and without waiving any of the foregoing, Defendants respond as follows:

22 **REQUEST FOR PRODUCTION NO. 1:**

23 Copy of an accessible current QuickBooks back up data file for YOU and YOUR BUSINESS. If
24 QuickBooks data file, or similar accounting system software, is not available, then please provide the
25 following:

- 26 a. Year-end profit and loss statements for all years starting in 2011 through the present time,
27 including year to date.
- 28 b. Year-end balance sheet reports for all years starting in 2011 through the present time,

1 including year to date.

2 c. Year-end general ledger reports for all years starting in 2011 through the present time,
3 including year to date.

4 d. In an up-to-date electronic Microsoft Excel spreadsheet format all transactions associated
5 with and downloaded from the Film Foetus Quiver account used to catalogue transactions
6 in the name of Joe Frank Movie since its inception, including but not limited to the print-
7 outs Excel reports since December 1, 2020, including but not limited to:.

8 (a) Actual earnings reports—monthly.

9 (b) iTunes estimated sales—daily, as well as all funds including but not limited to
10 funds from Microsoft, Amazon, Google and Vimeo, aggregated by Quiver.

11 (c) Payments.

12 (d) Detailed actual earnings—monthly.

13 e. In an up-to-date electronic Microsoft Excel spreadsheet format of all detailed transactions
14 associated with and downloaded from the Joe Frank Movie PayPal account since its
15 inception including but not limited to the print-outs of PayPal transactions since
16 December 1, 2020.

17 f. In an up-to-date electronic Microsoft Excel spreadsheet format of all detailed transactions
18 associated with and downloaded from the Joe Frank Movie, LLC bank account since its
19 inception including but not limited to the print-outs of transactions from this bank
20 account since December 1, 2020.

21 g. In an up-to-date electronic Microsoft Excel spreadsheet format of all detailed transactions
22 associated with and downloaded from the credit card ending in 3674 including print-outs
23 of transactions from this credit card since its inception.

24 h. In an up-to-date electronic Microsoft Excel spreadsheet format of all transactions from
25 2017 to date from bank account ending in 9183 including but not limited to printouts of
26 transactions from this bank account since 2017.

27 ///

28 ///

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 1:**

2 Defendants incorporate their General Objections as if set forth fully herein. Objection, this
3 request is unreasonably compound. Plaintiff is employing discovery in a manner that causes
4 unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)). Defendants
5 object to this request to the extent it seeks contentions, conclusions, or legal arguments. Defendants
6 object to this request to the extent the request as overbroad, vague, uncertain, and unintelligible such that
7 Defendants cannot determine the nature of the documents sought. Defendants further object to this
8 request to the extent that it: (i) seeks documents from persons, companies, or entities other than
9 Defendants, or otherwise not within Defendants’ possession, custody or control; (ii) seeks documents
10 that are within Plaintiff’s possession, custody or control; (iii) seeks documents that are publicly or
11 equally available to Plaintiff; (iv) seeks proprietary business information, trade secrets, or other
12 confidential information; and (v) seeks documents that are protected by the attorney-client and work
13 product privileges.

14 Objection, this request does not describe each requested item and category with reasonable
15 particularity.

16 Objection, the burden is incommensurate with the result sought. This request would require
17 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
18 the request is calculated to annoy and harass the Defendants.

19 Objection, this request seeks information that is immaterial, irrelevant, and not reasonably
20 calculated to lead to the discovery of admissible evidence. Objection, this request seeks documents
21 which are not reasonably calculated to lead to the discovery of admissible evidence and which are not
22 relevant to the subject matter of this case.

23 Objection, this request is also in invasion of Defendants’ right to privacy. See *Hrnjak v. Graymar*
24 (1971) 4 Cal.3d 725; *Pacific Gas & Elec. Co. v. Superior Court* (1994) 28 Cal.App.4th 174. The right of
25 privacy is secured by Article I, Section 1, of the California Constitution. Article I, Section 1’s,
26 “inalienable right” of privacy is a “fundamental interest” of our society, essential to those rights
27 guaranteed by the First, Third, Fourth, Fifth and Ninth Amendments to the U.S. Constitution. *Bd. of*
28 *Trustees v. Superior Court* (1981) 119 Cal.App.3d 516; *City of Santa Barbara v. Adamson* (1980) 27

1 Cal.3d 123; *White v. Davis* (1975) 13 Cal.3d 757. Further, the information sought is not relevant to the
2 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants'
3 constitutional right to privacy.

4 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
5 directing her demands to multiple parties within the same demand for production of documents.

6 Subject to, and without waiver of, the foregoing general and specific objections, and based upon
7 a reasonable interpretation of this request, Defendant Film Foetus will produce relevant, non-privileged
8 documents regarding the Joe Frank Movie that it is able to locate following a diligent search that are
9 responsive to this request. Any aspect of this request that is unrelated to the Joe Frank Movie is objected
10 to as improper, including as set forth above.

11 Defendants reserve the right to supplement their response to this request as discovery proceeds.

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

13 Copies of business Federal and State tax returns for the years 2017 through the present time,
14 including year to date, filed by YOUR BUSINESS.

15 **RESPONSE TO REQUEST FOR PRODUCTION NO. 2:**

16 Defendants incorporate their General Objections as if set forth fully herein. Objection, this
17 request is unreasonably compound. Plaintiff is employing discovery in a manner that causes
18 unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)). Defendants
19 object to this request to the extent it seeks contentions, conclusions, or legal arguments. Defendants
20 object to this request to the extent the request as overbroad, vague, uncertain, and unintelligible such that
21 Defendants cannot determine the nature of the documents sought. Defendants further object to this
22 request to the extent that it: (i) seeks documents from persons, companies, or entities other than
23 Defendants, or otherwise not within Defendants' possession, custody or control; (ii) seeks documents
24 that are within Plaintiff's possession, custody or control; (iii) seeks documents that are publicly or
25 equally available to Plaintiff; (iv) seeks proprietary business information, trade secrets, or other
26 confidential information; and (v) seeks documents that are protected by the attorney-client and work
27 product privileges.

1 Objection, federal and state tax returns, including W-2 and/or 1099 forms, are confidential and
2 privileged from disclosure under California and Federal law. See *Wilson v. Superior Court* (1976) 63
3 Cal.App.3d 825; *Webb v. Standard Oil Co.* (1957) 49 Cal.2d 509; *Brown v. Superior Court* (1977) 71
4 Cal.App.3d 141; *Schnabel v. Superior Court* (1993) 5 Cal.4th 704.

5 Objection, this request does not describe each requested item and category with reasonable
6 particularity.

7 Objection, the burden is incommensurate with the result sought. This request would require
8 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
9 the request is calculated to annoy and harass the Defendants.

10 Objection, this request seeks information that is immaterial, irrelevant, and not reasonably
11 calculated to lead to the discovery of admissible evidence. Objection, this request seeks documents
12 which are not reasonably calculated to lead to the discovery of admissible evidence and which are not
13 relevant to the subject matter of this case.

14 Objection, this request is also in invasion of Defendants' right to privacy. See *Hrnjak v. Graymar*
15 (1971) 4 Cal.3d 725; *Pacific Gas & Elec. Co. v. Superior Court* (1994) 28 Cal.App.4th 174. The right of
16 privacy is secured by Article I, Section 1, of the California Constitution. Article I, Section 1's,
17 "inalienable right" of privacy is a "fundamental interest" of our society, essential to those rights
18 guaranteed by the First, Third, Fourth, Fifth and Ninth Amendments to the U.S. Constitution. *Bd. of*
19 *Trustees v. Superior Court* (1981) 119 Cal.App.3d 516; *City of Santa Barbara v. Adamson* (1980) 27
20 Cal.3d 123; *White v. Davis* (1975) 13 Cal.3d 757. Further, the information sought is not relevant to the
21 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants'
22 constitutional right to privacy.

23 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
24 directing her demands to multiple parties within the same demand for production of documents.

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

26 Copies of BUSINESS bank records for all accounts dated from January 1, 2017 to the date of
27 production including but not limited to bank statements, deposit receipts and offsets, wire transfers,
28 Automated Teller Machine ("ATM") receipts or slips, Passbooks and deposit books.

1 **RESPONSE TO REQUEST FOR PRODUCTION NO. 3:**

2 Defendants incorporate their General Objections as if set forth fully herein. Objection, this
3 request is unreasonably compound. Plaintiff is employing discovery in a manner that causes
4 unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)). Defendants
5 object to this request to the extent it seeks contentions, conclusions, or legal arguments. Defendants
6 object to this request to the extent the request as overbroad, vague, uncertain, and unintelligible such that
7 Defendants cannot determine the nature of the documents sought. Defendants further object to this
8 request to the extent that it: (i) seeks documents from persons, companies, or entities other than
9 Defendants, or otherwise not within Defendants’ possession, custody or control; (ii) seeks documents
10 that are within Plaintiff’s possession, custody or control; (iii) seeks documents that are publicly or
11 equally available to Plaintiff; (iv) seeks proprietary business information, trade secrets, or other
12 confidential information; and (v) seeks documents that are protected by the attorney-client and work
13 product privileges.

14 Objection, this request does not describe each requested item and category with reasonable
15 particularity.

16 Objection, the burden is incommensurate with the result sought. This request would require
17 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
18 the request is calculated to annoy and harass the Defendants.

19 Objection, this request seeks information that is immaterial, irrelevant, and not reasonably
20 calculated to lead to the discovery of admissible evidence. Objection, this request seeks documents
21 which are not reasonably calculated to lead to the discovery of admissible evidence and which are not
22 relevant to the subject matter of this case.

23 Objection, this request is also in invasion of Defendants’ right to privacy. See *Hrnjak v. Graymar*
24 (1971) 4 Cal.3d 725; *Pacific Gas & Elec. Co. v. Superior Court* (1994) 28 Cal.App.4th 174. The right of
25 privacy is secured by Article I, Section 1, of the California Constitution. Article I, Section 1’s,
26 “inalienable right” of privacy is a “fundamental interest” of our society, essential to those rights
27 guaranteed by the First, Third, Fourth, Fifth and Ninth Amendments to the U.S. Constitution. *Bd. of*
28 *Trustees v. Superior Court* (1981) 119 Cal.App.3d 516; *City of Santa Barbara v. Adamson* (1980) 27

1 Cal.3d 123; *White v. Davis* (1975) 13 Cal.3d 757. Further, the information sought is not relevant to the
2 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants'
3 constitutional right to privacy.

4 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
5 directing her demands to multiple parties within the same demand for production of documents.

6 Subject to, and without waiver of, the foregoing general and specific objections, and based upon
7 a reasonable interpretation of this request, Defendant Film Foetus will produce relevant, non-privileged
8 documents regarding the Joe Frank Movie that it is able to locate following a diligent search that are
9 responsive to this request. Any aspect of this request that is unrelated to the Joe Frank Movie is objected
10 to as improper, including as set forth above.

11 Defendants reserve the right to supplement their response to this request as discovery proceeds.

12 **REQUEST FOR PRODUCTION NO. 4:**

13 Copies of all documents pertaining to the receipt of revenues generated by credit card sales from
14 January 2017 to the present time, including year to date. If the credit card issuer provides reports on a
15 monthly or yearly basis that will suffice.

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

17 Defendants incorporate their General Objections as if set forth fully herein. Objection, this
18 request is unreasonably compound. Plaintiff is employing discovery in a manner that causes
19 unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)). Defendants
20 object to this request to the extent it seeks contentions, conclusions, or legal arguments. Defendants
21 object to this request to the extent the request as overbroad, vague, uncertain, and unintelligible such that
22 Defendants cannot determine the nature of the documents sought. Defendants further object to this
23 request to the extent that it: (i) seeks documents from persons, companies, or entities other than
24 Defendants, or otherwise not within Defendants' possession, custody or control; (ii) seeks documents
25 that are within Plaintiff's possession, custody or control; (iii) seeks documents that are publicly or
26 equally available to Plaintiff; (iv) seeks proprietary business information, trade secrets, or other
27 confidential information; and (v) seeks documents that are protected by the attorney-client and work
28 product privileges.

1 Objection, this request does not describe each requested item and category with reasonable
2 particularity.

3 Objection, the burden is incommensurate with the result sought. This request would require
4 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
5 the request is calculated to annoy and harass the Defendants.

6 Objection, this request seeks information that is immaterial, irrelevant, and not reasonably
7 calculated to lead to the discovery of admissible evidence. Objection, this request seeks documents
8 which are not reasonably calculated to lead to the discovery of admissible evidence and which are not
9 relevant to the subject matter of this case.

10 Objection, this request is also in invasion of Defendants' right to privacy. See *Hrnjak v. Graymar*
11 (1971) 4 Cal.3d 725; *Pacific Gas & Elec. Co. v. Superior Court* (1994) 28 Cal.App.4th 174. The right of
12 privacy is secured by Article I, Section 1, of the California Constitution. Article I, Section 1's,
13 "inalienable right" of privacy is a "fundamental interest" of our society, essential to those rights
14 guaranteed by the First, Third, Fourth, Fifth and Ninth Amendments to the U.S. Constitution. *Bd. of*
15 *Trustees v. Superior Court* (1981) 119 Cal.App.3d 516; *City of Santa Barbara v. Adamson* (1980) 27
16 Cal.3d 123; *White v. Davis* (1975) 13 Cal.3d 757. Further, the information sought is not relevant to the
17 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants'
18 constitutional right to privacy.

19 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
20 directing her demands to multiple parties within the same demand for production of documents.

21 Subject to, and without waiver of, the foregoing general and specific objections, and based upon
22 a reasonable interpretation of this request, Defendant Film Foetus will produce relevant, non-privileged
23 documents regarding the Joe Frank Movie that it is able to locate following a diligent search that are
24 responsive to this request. Any aspect of this request that is unrelated to the Joe Frank Movie is objected
25 to as improper, including as set forth above.

26 Defendants reserve the right to supplement their response to this request as discovery proceeds.

27 **REQUEST FOR PRODUCTION NO. 5:**

28 Copies of any other DOCUMENTS reflecting any other receipts of monies from any other

1 source whether by way of sales, investments by third parties, loans by third parties, pertaining to YOU
2 or YOUR BUSINESS since January 2017 through the present time, including year to date.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 5:**

4 Defendants incorporate their General Objections as if set forth fully herein. Objection, this
5 request is unreasonably compound. Plaintiff is employing discovery in a manner that causes
6 unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)). Defendants
7 object to this request to the extent it seeks contentions, conclusions, or legal arguments. Defendants
8 object to this request to the extent the request as overbroad, vague, uncertain, and unintelligible such that
9 Defendants cannot determine the nature of the documents sought. Defendants further object to this
10 request to the extent that it: (i) seeks documents from persons, companies, or entities other than
11 Defendants, or otherwise not within Defendants' possession, custody or control; (ii) seeks documents
12 that are within Plaintiff's possession, custody or control; (iii) seeks documents that are publicly or
13 equally available to Plaintiff; (iv) seeks proprietary business information, trade secrets, or other
14 confidential information; and (v) seeks documents that are protected by the attorney-client and work
15 product privileges.

16 Objection, this request does not describe each requested item and category with reasonable
17 particularity.

18 Objection, the burden is incommensurate with the result sought. This request would require
19 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
20 the request is calculated to annoy and harass the Defendants.

21 Objection, this request seeks information that is immaterial, irrelevant, and not reasonably
22 calculated to lead to the discovery of admissible evidence. Objection, this request seeks documents
23 which are not reasonably calculated to lead to the discovery of admissible evidence and which are not
24 relevant to the subject matter of this case.

25 Objection, this request is also in invasion of Defendants' right to privacy. See *Hrnjak v. Graymar*
26 (1971) 4 Cal.3d 725; *Pacific Gas & Elec. Co. v. Superior Court* (1994) 28 Cal.App.4th 174. The right of
27 privacy is secured by Article I, Section 1, of the California Constitution. Article I, Section 1's,
28 "inalienable right" of privacy is a "fundamental interest" of our society, essential to those rights

1 guaranteed by the First, Third, Fourth, Fifth and Ninth Amendments to the U.S. Constitution. *Bd. of*
2 *Trustees v. Superior Court* (1981) 119 Cal.App.3d 516; *City of Santa Barbara v. Adamson* (1980) 27
3 Cal.3d 123; *White v. Davis* (1975) 13 Cal.3d 757. Further, the information sought is not relevant to the
4 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants'
5 constitutional right to privacy.

6 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
7 directing her demands to multiple parties within the same demand for production of documents.

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

9 For the Time Period specified, copies of all notes receivable for YOU or YOUR BUSINESS.

10 **RESPONSE TO REQUEST FOR PRODUCTION NO. 6:**

11 Defendants incorporate their General Objections as if set forth fully herein. Objection, this
12 request is unreasonably compound. Plaintiff is employing discovery in a manner that causes
13 unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)). Defendants
14 object to this request to the extent it seeks contentions, conclusions, or legal arguments. Defendants
15 object to this request to the extent the request as overbroad, vague, uncertain, and unintelligible such that
16 Defendants cannot determine the nature of the documents sought. Defendants further object to this
17 request to the extent that it: (i) seeks documents from persons, companies, or entities other than
18 Defendants, or otherwise not within Defendants' possession, custody or control; (ii) seeks documents
19 that are within Plaintiff's possession, custody or control; (iii) seeks documents that are publicly or
20 equally available to Plaintiff; (iv) seeks proprietary business information, trade secrets, or other
21 confidential information; and (v) seeks documents that are protected by the attorney-client and work
22 product privileges.

23 Objection, this request does not describe each requested item and category with reasonable
24 particularity.

25 Objection, the burden is incommensurate with the result sought. This request would require
26 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
27 the request is calculated to annoy and harass the Defendants.

1 Objection, this request seeks information that is immaterial, irrelevant, and not reasonably
2 calculated to lead to the discovery of admissible evidence. Objection, this request seeks documents
3 which are not reasonably calculated to lead to the discovery of admissible evidence and which are not
4 relevant to the subject matter of this case.

5 Objection, this request is also in invasion of Defendants’ right to privacy. See *Hrnjak v. Graymar*
6 (1971) 4 Cal.3d 725; *Pacific Gas & Elec. Co. v. Superior Court* (1994) 28 Cal.App.4th 174. The right of
7 privacy is secured by Article I, Section 1, of the California Constitution. Article I, Section 1’s,
8 “inalienable right” of privacy is a “fundamental interest” of our society, essential to those rights
9 guaranteed by the First, Third, Fourth, Fifth and Ninth Amendments to the U.S. Constitution. *Bd. of*
10 *Trustees v. Superior Court* (1981) 119 Cal.App.3d 516; *City of Santa Barbara v. Adamson* (1980) 27
11 Cal.3d 123; *White v. Davis* (1975) 13 Cal.3d 757. Further, the information sought is not relevant to the
12 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants’
13 constitutional right to privacy.

14 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
15 directing her demands to multiple parties within the same demand for production of documents.

16 **REQUEST FOR PRODUCTION NO. 7:**

17 If and to the extent not covered above, any or all documents, including but not limited to, bank
18 statements and revenues generated by credit cards, reflecting all funds deposited by all BUSINESS as
19 defined herein, whether the account is in YOUR NAME individually or jointly with any other person or
20 entity at any bank or other financial institution for the TIME PERIOD, including year to date.

21 **RESPONSE TO REQUEST FOR PRODUCTION NO. 7:**

22 Defendants incorporate their General Objections as if set forth fully herein. Objection, this
23 request is unreasonably compound. Plaintiff is employing discovery in a manner that causes
24 unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)). Defendants
25 object to this request to the extent it seeks contentions, conclusions, or legal arguments. Defendants
26 object to this request to the extent the request as overbroad, vague, uncertain, and unintelligible such that
27 Defendants cannot determine the nature of the documents sought. Defendants further object to this
28 request to the extent that it: (i) seeks documents from persons, companies, or entities other than

1 Defendants, or otherwise not within Defendants' possession, custody or control; (ii) seeks documents
2 that are within Plaintiff's possession, custody or control; (iii) seeks documents that are publicly or
3 equally available to Plaintiff; (iv) seeks proprietary business information, trade secrets, or other
4 confidential information; and (v) seeks documents that are protected by the attorney-client and work
5 product privileges.

6 Objection, this request does not describe each requested item and category with reasonable
7 particularity.

8 Objection, the burden is incommensurate with the result sought. This request would require
9 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
10 the request is calculated to annoy and harass the Defendants.

11 Objection, this request seeks information that is immaterial, irrelevant, and not reasonably
12 calculated to lead to the discovery of admissible evidence. Objection, this request seeks documents
13 which are not reasonably calculated to lead to the discovery of admissible evidence and which are not
14 relevant to the subject matter of this case.

15 Objection, this request is also in invasion of Defendants' right to privacy. See *Hrnjak v. Graymar*
16 (1971) 4 Cal.3d 725; *Pacific Gas & Elec. Co. v. Superior Court* (1994) 28 Cal.App.4th 174. The right of
17 privacy is secured by Article I, Section 1, of the California Constitution. Article I, Section 1's,
18 "inalienable right" of privacy is a "fundamental interest" of our society, essential to those rights
19 guaranteed by the First, Third, Fourth, Fifth and Ninth Amendments to the U.S. Constitution. *Bd. of*
20 *Trustees v. Superior Court* (1981) 119 Cal.App.3d 516; *City of Santa Barbara v. Adamson* (1980) 27
21 Cal.3d 123; *White v. Davis* (1975) 13 Cal.3d 757. Further, the information sought is not relevant to the
22 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants'
23 constitutional right to privacy.

24 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
25 directing her demands to multiple parties within the same demand for production of documents.

26 **REQUEST FOR PRODUCTION NO. 8:**

27 For the time period, all ledgers or other tangible method of recording sales reflecting the gross
28 amount of sales generated by the distribution of the documentary. If the distribution has been delegated

1 to another person or entity whether related to or associated with YOU or not, all ledgers pertaining
2 thereto or other tangible method of recording revenues generated.

3 **RESPONSE TO REQUEST FOR PRODUCTION NO. 8:**

4 Defendants incorporate their General Objections as if set forth fully herein. Objection, this
5 request is unreasonably compound. Plaintiff is employing discovery in a manner that causes
6 unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)). Defendants
7 object to this request to the extent it seeks contentions, conclusions, or legal arguments. Defendants
8 object to this request to the extent the request as overbroad, vague, uncertain, and unintelligible such that
9 Defendants cannot determine the nature of the documents sought. Defendants further object to this
10 request to the extent that it: (i) seeks documents from persons, companies, or entities other than
11 Defendants, or otherwise not within Defendants' possession, custody or control; (ii) seeks documents
12 that are within Plaintiff's possession, custody or control; (iii) seeks documents that are publicly or
13 equally available to Plaintiff; (iv) seeks proprietary business information, trade secrets, or other
14 confidential information; and (v) seeks documents that are protected by the attorney-client and work
15 product privileges.

16 Objection, this request does not describe each requested item and category with reasonable
17 particularity.

18 Objection, the burden is incommensurate with the result sought. This request would require
19 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
20 the request is calculated to annoy and harass the Defendants.

21 Objection, this request seeks information that is immaterial, irrelevant, and not reasonably
22 calculated to lead to the discovery of admissible evidence. Objection, this request seeks documents
23 which are not reasonably calculated to lead to the discovery of admissible evidence and which are not
24 relevant to the subject matter of this case.

25 Objection, this request is also in invasion of Defendants' right to privacy. See *Hrnjak v. Graymar*
26 (1971) 4 Cal.3d 725; *Pacific Gas & Elec. Co. v. Superior Court* (1994) 28 Cal.App.4th 174. The right of
27 privacy is secured by Article I, Section 1, of the California Constitution. Article I, Section 1's,
28 "inalienable right" of privacy is a "fundamental interest" of our society, essential to those rights

1 guaranteed by the First, Third, Fourth, Fifth and Ninth Amendments to the U.S. Constitution. *Bd. of*
2 *Trustees v. Superior Court* (1981) 119 Cal.App.3d 516; *City of Santa Barbara v. Adamson* (1980) 27
3 Cal.3d 123; *White v. Davis* (1975) 13 Cal.3d 757. Further, the information sought is not relevant to the
4 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants'
5 constitutional right to privacy.

6 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
7 directing her demands to multiple parties within the same demand for production of documents.

8 Subject to, and without waiver of, the foregoing general and specific objections, and based upon
9 a reasonable interpretation of this request, Defendant Film Foetus will produce relevant, non-privileged
10 documents regarding the Joe Frank Movie that it is able to locate following a diligent search that are
11 responsive to this request. Any aspect of this request that is unrelated to the Joe Frank Movie is objected
12 to as improper, including as set forth above.

13 Defendants reserve the right to supplement their response to this request as discovery proceeds.

14 **REQUEST FOR PRODUCTION NO. IV(1):**

15 Provide a Final Budget in an electronic Microsoft Excel spreadsheet format listing only the hard
16 costs to finish the film referred to as Completion Funding in ¶ 5 of the contract accumulated up to and
17 including July 10, 2016 not to exceed the amount of \$ 29,000.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. IV(1):**

19 Objection, this request is not numbered consecutively pursuant to CCP §2031.030(a)(1).

20 Objection, this request is unreasonably compound. Plaintiff is employing discovery in a manner
21 that causes unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)).

22 Objection, this request does not describe each requested item and category with reasonable
23 particularity.

24 Objection, the burden is incommensurate with the result sought. This request would require
25 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
26 the request is calculated to annoy and harass the Defendants.

27 Objection, this request seeks information that is immaterial, irrelevant, and not reasonably
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1 which are not reasonably calculated to lead to the discovery of admissible evidence and which are not
2 relevant to the subject matter of this case.

3 Objection, this request is also in invasion of Defendants’ right to privacy. See *Hrnjak v. Graymar*
4 (1971) 4 Cal.3d 725; *Pacific Gas & Elec. Co. v. Superior Court* (1994) 28 Cal.App.4th 174. The right of
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9 Cal.3d 123; *White v. Davis* (1975) 13 Cal.3d 757. Further, the information sought is not relevant to the
10 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants’
11 constitutional right to privacy.

12 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
13 directing her demands to multiple parties within the same demand for production of documents.

14 **REQUEST FOR PRODUCTION NO. IV(2):**

15 Provide in an electronic Microsoft Excel spreadsheet format the hard costs incurred between July
16 10, 2016 and March 2018 of approximately \$ 65,000.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. IV(2):**

18 Objection, this request is not numbered consecutively pursuant to CCP §2031.030(a)(1).

19 Objection, this request is unreasonably compound. Plaintiff is employing discovery in a manner
20 that causes unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)).

21 Objection, this request does not describe each requested item and category with reasonable
22 particularity.

23 Objection, the burden is incommensurate with the result sought. This request would require
24 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
25 the request is calculated to annoy and harass the Defendants.

26 Objection, this request seeks information that is immaterial, irrelevant, and not reasonably
27 calculated to lead to the discovery of admissible evidence. Objection, this request seeks documents

1 which are not reasonably calculated to lead to the discovery of admissible evidence and which are not
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4 (1971) 4 Cal.3d 725; *Pacific Gas & Elec. Co. v. Superior Court* (1994) 28 Cal.App.4th 174. The right of
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8 *Trustees v. Superior Court* (1981) 119 Cal.App.3d 516; *City of Santa Barbara v. Adamson* (1980) 27
9 Cal.3d 123; *White v. Davis* (1975) 13 Cal.3d 757. Further, the information sought is not relevant to the
10 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants’
11 constitutional right to privacy.

12 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
13 directing her demands to multiple parties within the same demand for production of documents.

14 **REQUEST FOR PRODUCTION NO. IV(3):**

15 Copies of all canceled checks and/or credit card receipt corresponding to invoices and/or receipts
16 of said hard costs to finish the film.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. IV(3):**

18 Objection, this request is not numbered consecutively pursuant to CCP §2031.030(a)(1).

19 Objection, this request is unreasonably compound. Plaintiff is employing discovery in a manner
20 that causes unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)).

21 Objection, this request does not describe each requested item and category with reasonable
22 particularity.

23 Objection, the burden is incommensurate with the result sought. This request would require
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10 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants’
11 constitutional right to privacy.

12 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
13 directing her demands to multiple parties within the same demand for production of documents.

14 **REQUEST FOR PRODUCTION NO. IV(4):**

15 Copies of all canceled checks, receipts from money orders, wire transfers and any other deposits
16 made, since 2016 to date in the interests of the film and any and all of the aforementioned bank
17 accounts.

18 **RESPONSE TO REQUEST FOR PRODUCTION NO. IV(4):**

19 Objection, this request is not numbered consecutively pursuant to CCP §2031.030(a)(1).

20 Objection, this request is unreasonably compound. Plaintiff is employing discovery in a manner
21 that causes unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)).

22 Objection, this request does not describe each requested item and category with reasonable
23 particularity.

24 Objection, the burden is incommensurate with the result sought. This request would require
25 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
26 the request is calculated to annoy and harass the Defendants.

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10 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants’
11 constitutional right to privacy.

12 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
13 directing her demands to multiple parties within the same demand for production of documents.

14 **REQUEST FOR PRODUCTION NO. IV(5):**

15 Provide documentation of all revenues received, including but not limited to, sales, licenses,
16 screenings, awards, merchandising, and ancillary rights and donations.

17 **RESPONSE TO REQUEST FOR PRODUCTION NO. IV(5):**

18 Objection, this request is not numbered consecutively pursuant to CCP §2031.030(a)(1).

19 Objection, this request is unreasonably compound. Plaintiff is employing discovery in a manner
20 that causes unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)).

21 Objection, this request does not describe each requested item and category with reasonable
22 particularity.

23 Objection, the burden is incommensurate with the result sought. This request would require
24 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
25 the request is calculated to annoy and harass the Defendants.

26 Objection, this request seeks information that is immaterial, irrelevant, and not reasonably
27 calculated to lead to the discovery of admissible evidence. Objection, this request seeks documents

1 which are not reasonably calculated to lead to the discovery of admissible evidence and which are not
2 relevant to the subject matter of this case.

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10 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants’
11 constitutional right to privacy.

12 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
13 directing her demands to multiple parties within the same demand for production of documents.

14 **REQUEST FOR PRODUCTION NO. V(1):**

15 Provide copies of all agreements entered into between Film Foetus, David P. Carlson and/or Joe
16 Frank Movie, LLC with regard to the movie, including but not limited to, sales agreements, license
17 agreements (including music licensing), distribution agreements a, investor agreements, debt
18 agreements, appearance releases, facility rental agreements, rights clearance documents, insurance
19 agreements and certificates.

20 **RESPONSE TO REQUEST FOR PRODUCTION NO. V(1):**

21 Objection, this request is not numbered consecutively pursuant to CCP §2031.030(a)(1).

22 Objection, this request is unreasonably compound. Plaintiff is employing discovery in a manner
23 that causes unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)).

24 Objection, this request does not describe each requested item and category with reasonable
25 particularity.

26 Objection, the burden is incommensurate with the result sought. This request would require
27 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
28 the request is calculated to annoy and harass the Defendants.

1 Objection, this request seeks information that is immaterial, irrelevant, and not reasonably
2 calculated to lead to the discovery of admissible evidence. Objection, this request seeks documents
3 which are not reasonably calculated to lead to the discovery of admissible evidence and which are not
4 relevant to the subject matter of this case.

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12 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants’
13 constitutional right to privacy.

14 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
15 directing her demands to multiple parties within the same demand for production of documents.

16 **REQUEST FOR PRODUCTION NO. V(2):**

17 Provide copies of all agreements entered into between Film Foetus, David P. Carlson and/or Joe
18 Frank Movie, LLC with the following individuals and/or entity. Include copies of cancelled checks or
19 money order receipts and /or proof of wire transfer from:

- 20 • Producers—Doug Elliot, Woody Woodson and Haoyan of America.
- 21 • Associate Producers—Mike Weber, John Travis, Robert Eichelberg, Bill and Rossana
- 22 • Baldwin.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. V(2):**

24 Objection, this request is not numbered consecutively pursuant to CCP §2031.030(a)(1).

25 Objection, this request is unreasonably compound. Plaintiff is employing discovery in a manner
26 that causes unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)).

27 Objection, this request does not describe each requested item and category with reasonable
28 particularity.

1 Objection, the burden is incommensurate with the result sought. This request would require
2 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
3 the request is calculated to annoy and harass the Defendants.

4 Objection, this request seeks information that is immaterial, irrelevant, and not reasonably
5 calculated to lead to the discovery of admissible evidence. Objection, this request seeks documents
6 which are not reasonably calculated to lead to the discovery of admissible evidence and which are not
7 relevant to the subject matter of this case.

8 Objection, this request is also in invasion of Defendants' right to privacy. See *Hrnjak v. Graymar*
9 (1971) 4 Cal.3d 725; *Pacific Gas & Elec. Co. v. Superior Court* (1994) 28 Cal.App.4th 174. The right of
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14 Cal.3d 123; *White v. Davis* (1975) 13 Cal.3d 757. Further, the information sought is not relevant to the
15 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants'
16 constitutional right to privacy.

17 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
18 directing her demands to multiple parties within the same demand for production of documents.

19 **REQUEST FOR PRODUCTION NO. V(3):**

20 A copy of the Agreements entered into between Defendants and WI PBS Wisconsin, including
21 all agreements entered into after the initial agreement. If you contend there were oral agreements, all
22 memoranda relating to any such agreements.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. V(3):**

24 Objection, this request is not numbered consecutively pursuant to CCP §2031.030(a)(1).

25 Objection, this request is unreasonably compound. Plaintiff is employing discovery in a manner
26 that causes unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)).

27 Objection, this request does not describe each requested item and category with reasonable
28 particularity.

1 Objection, the burden is incommensurate with the result sought. This request would require
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15 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants'
16 constitutional right to privacy.

17 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
18 directing her demands to multiple parties within the same demand for production of documents.

19 **REQUEST FOR PRODUCTION NO. V(4):**

20 Regarding your email dated March 29, 2018, furnish all cancelled checks reflecting the amounts
21 you received, sources of said funding, agreements or contracts entered into in order to secure said
22 funding, and any and all documentation regarding these expenses.

23 **RESPONSE TO REQUEST FOR PRODUCTION NO. V(4):**

24 Objection, this request is not numbered consecutively pursuant to CCP §2031.030(a)(1).

25 Objection, this request is unreasonably compound. Plaintiff is employing discovery in a manner
26 that causes unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)).

27 Objection, this request does not describe each requested item and category with reasonable
28 particularity.

1 Objection, the burden is incommensurate with the result sought. This request would require
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15 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants'
16 constitutional right to privacy.

17 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
18 directing her demands to multiple parties within the same demand for production of documents.

19 **REQUEST FOR PRODUCTION NO. V(5):**

20 To the extent not otherwise provided, documents pertaining to all third party investments made
21 into the Joe Frank Movie.

22 **RESPONSE TO REQUEST FOR PRODUCTION NO. V(5):**

23 Objection, this request is not numbered consecutively pursuant to CCP §2031.030(a)(1).

24 Objection, this request is unreasonably compound. Plaintiff is employing discovery in a manner
25 that causes unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)).

26 Objection, this request does not describe each requested item and category with reasonable
27 particularity.

1 Objection, the burden is incommensurate with the result sought. This request would require
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15 subject matter of the pending action, or if so, does not outweigh the prejudice to Defendants'
16 constitutional right to privacy.

17 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
18 directing her demands to multiple parties within the same demand for production of documents.

19 **REQUEST FOR PRODUCTION NO. VI(1):**

20 Provide all formation documents for Joe Frank Movie, LLC and/or any other entity Carlson or
21 Film Foetus entered in connection with the Picture, including without limitation the Articles of
22 Organization, Operating Agreement and any additional associated documents. In addition, provide (a)
23 the annual reports for 2017, 2018, 2019, 2020, and 2021; and (b) any other filings with the Illinois
24 Secretary of State regarding the Joe Frank Movie LLC, and/or any other entity created by Mr. Carlson in
25 connection with the Movie.

26 **RESPONSE TO REQUEST FOR PRODUCTION NO. VI(1):**

27 Objection, this request is not numbered consecutively pursuant to CCP §2031.030(a)(1).
28

1 Objection, this request is unreasonably compound. Plaintiff is employing discovery in a manner
2 that causes unwarranted annoyance, oppression and undue burden and expense (CCP §2023.010(c)).

3 Objection, this request does not describe each requested item and category with reasonable
4 particularity.

5 Objection, the burden is incommensurate with the result sought. This request would require
6 Defendants to conduct a search of files from multiple sources and/or multiple institutions and therefore
7 the request is calculated to annoy and harass the Defendants.

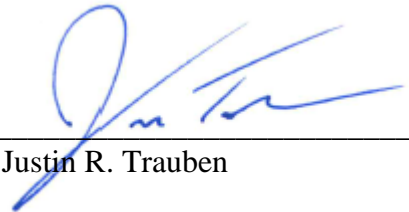
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21 Objection, these requests are improperly propounded upon multiple parties, with Plaintiff
22 directing her demands to multiple parties within the same demand for production of documents.

1 **DATED:** March 22, 2022

SINGH, SINGH & TRAUBEN, LLP
JUSTIN R. TRAUBEN

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4 By: 
Justin R. Trauben

5 *Attorneys for Defendants*
6 DAVID CARLSON *and* FILM FOETUS, INC.

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PROOF OF SERVICE
California Rules of Court, Rule 2.251
Code of Civil Procedure sections 1010.6, 1013, 1013a, and 1013b

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

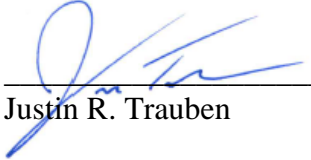
I am over the age of 18 and not a party to the within action; I am employed by SINGH, SINGH & TRAUBEN, LLP in the County of Los Angeles at 400 S. Beverly Drive, Suite 240, Beverly Hills, CA 90212.

On March 22, 2022, I served the foregoing documents described as:

DEFENDANTS DAVID CARLSON AND FILM FOETUS, INC.'S RESPONSES AND OBJECTIONS TO PLAINTIFF MICHAL STORY'S DEMAND FOR IDENTIFICATION AND PRODUCTION OF DOCUMENTS PROPOUNDED (SET ONE)

- (BY MAIL)** I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the firm's practice for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred.
- (BY E-MAIL OR ELECTRONIC TRANSMISSION)** I caused the document(s) to be sent from e-mail address jtrauben@singhtraubenlaw.com to the persons at the e-mail addresses listed in the Service List. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.
- (BY FEDERAL EXPRESS DELIVERY)** By placing a true and correct copy of the above document(s) in a sealed envelope addressed as indicated above and causing such envelope(s) to be delivered to the FEDERAL EXPRESS Service Center, on _____, to be delivered by their next business day delivery service on _____, to the addressee designated.
- (BY PERSONAL SERVICE)** I caused such envelope(s) to be hand delivered to the offices of the addressee(s), or by hand to the addressee or its designated representative.
- (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

Executed on March 22, 2022 at Beverly Hills, California.


Justin R. Trauben

1 **MICHAL STORY v. DAVID CARLSON et al.**

2 **ASSIGNED TO:**
3 **HON. THERESA M. TRABER | DEPT. 47**

4 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
5 **COUNTY OF LOS ANGELES – CENTRAL DISTRICT**

6 **CASE NO: 21STCV29163**

7 **SERVICE LIST**

8 **RICHARD ROSS, ESQ.**

9 ross777@yahoo.com

10 424 S. Beverly Drive

11 Beverly Hills, California 90212

12 Tel.: (310) 245-1911

Attorney for Plaintiff

MICHAL STORY