

1 BROWN RUDNICK LLP
RANDALL A. SMITH, #116244
2 rsmith@brownrudnick.com
CAMILLE M. VASQUEZ, #273377
3 cvasquez@brownrudnick.com
SAMUEL A. MONIZ, #313274
4 smoniz@brownrudnick.com
2211 Michelson Drive, 7th Floor
5 Irvine, CA 92612
Telephone: (949) 752-7100
6 Facsimile: (949) 252-1514

7 Attorneys for Defendants,
JOHN C. DEPP, II and INFINITUM NIHIL

8
9 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
10 **FOR THE COUNTY OF LOS ANGELES**

11 GREGG "ROCKY" BROOKS,

12 Plaintiff,

13 vs.

14 JOHN C. DEPP, an individual; MIRIAM
SEGAL, an individual; BRAD FURMAN, an
individual; GOOD FILM PRODUCTIONS
15 US, INC., a New York Corporation;
INFINITUM NIHIL, A Californian
16 Corporation; And DOES 1-50,

17 Defendants.

CASE NO. BC713123

ASSIGNED FOR ALL PURPOSES TO
HON. HOLLY J. FUJIE, DEPT. 56

**REPLY TO OPPOSITION TO MOTION
TO RECLASSIFY AS LIMITED CIVIL
CASE**

DATE: September 3, 2019
TIME: 8:30 a.m.
DEPT: 56

RESERVATION ID: 191622024212

COMPLAINT FILED: July 6, 2018
TRIAL DATE: October 21, 2019

1 Defendants John C. Depp, II (“Mr. Depp”) and Infinitum Nihil (collectively, “Defendants”)
2 reply to the Opposition to Motion to Reclassify (“Opposition”) filed by Plaintiff Gregg “Rocky”
3 Brooks (“Plaintiff”) as follows:¹

4 1. INTRODUCTION

5 Plaintiff is unable to identify any actual, recoverable damages that would justify his
6 insistence that this case be heard in unlimited civil court, and the Motion should be granted.
7 Although Plaintiff cites generic authorities for the proposition that reclassification should only be
8 ordered when it is certain that any recovery cannot exceed \$25,000, Plaintiff ignores the fact that
9 that standard is clearly met here. Indeed, Plaintiff’s own concessions in his filings with this Court
10 make plain that his alleged damages cannot satisfy the jurisdictional minimum of this Court, and
11 the Opposition fails to present any viable legal theory under which Plaintiff’s damages could even
12 approach that amount.

13 The obvious and inescapable explanation for the above-referenced shortcomings is that Mr.
14 Depp *never* punched Mr. Brooks that night or any other night. This baseless action does belong in
15 any court, but clearly does not qualify to remain in the unlimited civil division.

16 Plaintiff claims to have been punched by Mr. Depp, but has never identified any tangible
17 injury that actually resulted from that alleged incident (which Mr. Depp denies ever occurred, as
18 supported by a third party eyewitness to the entire interaction). Indeed, although he now attempts
19 to retreat from this admission, Plaintiff conceded in his Case Management Statement that he seeks
20 merely “*nominal*” damages, in addition to punitive damages.² Moreover, although the Opposition
21 attempts to argue that Plaintiff might be able to recover medical damages, Plaintiff’s discovery
22 responses, which were served seventeen months after the alleged incident in November of 2018,
23 *conceded that as of that date he had never received any medical treatment*—or even consulted
24 with a medical professional—in connection with any alleged injury arising from the purported

25 _____
26 ¹ Except as otherwise stated, all capitalized terms have the same meaning as in the Motion.

27 ² Plaintiff also included a vague reference to “unknown” medical damages, but has never disclosed any actual
28 medical expenses in discovery, and describes no such expenses in his Complaint. Tellingly, no evidence of any
medical expenses is presented in the Opposition.

1 incident. Indeed, according to his discovery responses, Plaintiff has never so much as taken over-
2 the-counter pain medication as a result of the alleged incident. Under these circumstances, any
3 recovery by Plaintiff would necessarily be less than \$25,000, and this case should properly be heard
4 (if at all) in limited civil court.

5 The Opposition consists of two basic arguments, neither of which is plausible. First,
6 Plaintiff argues that he could conceivably recover in excess of \$25,000 in this action, based on
7 some combination of his claims for punitive damages, pain and suffering, and lost wages. As
8 detailed below, Plaintiff is incorrect, and there simply is no viable legal theory under which any
9 combination of those alleged damages could exceed \$25,000. Second, Plaintiff argues that the
10 Motion should have been brought at an earlier date. As explained in the Motion, however,
11 Defendants have repeatedly sought to obtain Plaintiff's agreement to reclassify this case, and also
12 engaged in discussions related to the resolution of this case. Given the ultimately trivial nature of
13 Plaintiff's claims, Defendants had hoped to avoid the need for motion practice. Defendants have
14 good cause for seeking to reclassify this case at this juncture following Plaintiff's final refusal to
15 agree to reclassification, and the Motion should be granted.

16 2. ARGUMENT

17 A. Plaintiff Has Failed To Establish That His Alleged Damages Could Possibly Reach
18 The Jurisdictional Minimum Of This Court

19 Even if Plaintiff's claims were not fictitious, Plaintiff would have no basis to seek more
20 than \$25,000 in this action, and the Motion should be granted. Each of the items of damages
21 claimed by Plaintiff is either barred as a matter of law, or trivial in amount, and it is certain that
22 Plaintiff cannot recover more than \$25,000 in this action.

23 (1) Plaintiff's Purported Lost Wages Have Nothing To Do With Defendants,
24 And Cannot Serve As A Basis For Damages In This Action

25 In an attempt to argue that the amount in controversy exceeds \$25,000, the Opposition cites
26 discovery responses served by Plaintiff in this action, which assert that Plaintiff has suffered
27 \$70,000 in lost wages as a result of the alleged incident and the ensuing lawsuit. That is pure
28 fantasy. Indeed, the fact that Plaintiff is reduced to advancing such a farfetched (and legally

1 untenable) theory amounts to a tacit concession that Plaintiff has suffered no actual, recoverable
2 damages. Although no such claim is alleged in Plaintiff’s Complaint, the theory set forth in
3 Plaintiff’s response to Form Interrogatory Nos. 8.6 and 8.7 is that “Plaintiff has been denied two
4 jobs, each expected to run for several months, because of this incident and the ensuing lawsuit,”
5 and that “[t]he lost jobs have resulted in a loss of approximately \$70,000 in income.”³

6 Nonsense. As a matter of law, Defendants cannot be held responsible for Plaintiff’s having
7 been denied work because of this lawsuit. This is not a case where Plaintiff is suggesting that he
8 suffered a physical injury that rendered him unable to work. Rather, Plaintiff appears to be arguing
9 that the fact that he has filed this lawsuit has somehow made him less marketable to potential
10 employers. But negative personal consequences of litigation are not a recoverable element of
11 damages—if they were, every plaintiff would include the time, cost, stress, and inconvenience of
12 litigation as claimed damages. For instance, it is well grounded that a plaintiff’s litigation costs are
13 not an element of damages, even though the litigation costs may be significant, and may be a
14 natural result of a defendant’s actions. *See, e.g., Gorman v. Tassajara Development Corp.* (2009)
15 178 Cal.App.4th 44, 83 (noting the “general rule that the expenses of litigation are ordinarily not
16 considered tort damages”); *see also, Gray v. Don Miller & Associates, Inc.* (1984) 33 Cal.3d 498,
17 504 (“[u]nder the American rule, as a general proposition each party must pay his own attorney
18 fees”). Any adverse employment consequences that Plaintiff claims have arisen as a result of his
19 filing of this lawsuit are not properly understood as recoverable damages for the underlying tort
20 alleged, and may not properly be relied upon to defeat the reclassification of this action.

21 In any event, Defendants have no control over the hiring and firing decisions of Plaintiff’s
22 potential future employers, and there simply is no viable argument that those decisions are a natural
23 and probable effect of the manufactured altercation between Plaintiff and Mr. Depp at issue in this
24 case. *See, e.g., Booker v. El Encino Co.* (1963) 216 Cal.App.2d 598, 602 (“a party is only

25
26 ³ Although Plaintiff relied on his discovery responses in his Opposition, he did not recite their substance, and did
27 not attach them as an exhibit. To enable the Court to evaluate Plaintiff’s claims regarding his discovery responses in
28 context, a true and correct copy of Plaintiff’s Responses to General Form Interrogatories - Set One, is attached to the
Supplemental Declaration of Camille M. Vasquez (“Supp. Vasquez Decl.”) at ¶4. A true and correct copy of Plaintiff’s
Supplemental Responses to General Form Interrogatories - Set One is attached to the Supp. Vasquez Decl. at ¶4.

1 answerable for the natural, probable, reasonable, and proximate consequences of his acts”); *see*
2 *also, Brewer v. Teano* (1995) 40 Cal.App.4th 1024, 1030 (explaining that in evaluating principles
3 of duty and causation, a court must evaluate “whether the category of negligent conduct at issue is
4 sufficiently likely to result in the kind of harm experienced that liability may appropriately be
5 imposed”). Even accepting as true the unsupported assertion that Plaintiff has lost work because of
6 this lawsuit, the conduct of Plaintiff’s potential employers—and Plaintiff’s own conduct in filing
7 this lawsuit—would constitute an intervening and superseding cause, and no liability for these
8 supposed lost jobs could possibly attach to Defendants.

9 In short, Plaintiff’s suggestion that he might be entitled to recover anything in this action for
10 his supposed lost wages is invalid on its face, and certainly cannot justify continuing to hear this
11 matter in unlimited civil court.

12 (2) Plaintiff’s Discovery Responses And Case Management Statement Fail To
13 Identify Any Actual Medical Or Other Damages

14 In his Opposition, Plaintiff also asserts that Defendants have ignored a reference to
15 “unknown” medical expenses in his Case Management Statement, suggesting that medical
16 expenses may exceed the jurisdictional minimum of this Court. This argument is also meritless.
17 Plaintiff has never identified any actual medical expenses in his discovery responses. Nor has
18 Plaintiff alleged medical expenses in his Complaint, or presented any evidence of medical expenses
19 in his Opposition.

20 In fact, Plaintiff’s most recent response to Form Interrogatory No. 6.4 concedes that as of
21 November 29, 2018—nineteen months after the date of the purported incident—he had incurred *no*
22 *medical expenses* as a result of the incident, and had not even received a consultation, examination,
23 or treatment for any injury. (Vasquez Decl. at ¶4, Exhibit “2”.) Although Plaintiff’s discovery
24 responses also included a reference to a possible future consultation with a therapist, Plaintiff has
25 never supplemented with any evidence of any actual medical expenses incurred—*and no such*
26 *evidence is presented in the Opposition*. Moreover, Plaintiff’s response to Form Interrogatory No.
27 6.5 admits that Plaintiff has never taken or been prescribed *any* medication whatsoever—not so
28 much an aspirin—as a result of the incident. *Id.* Plaintiff’s response to Form Interrogatory No. 6.6

1 admits that there were no other medical services necessitated by the incident, and his response to
2 Form Interrogatory No. 6.7 concedes that no health care provider has ever advised him of the need
3 for future medical treatment. *Id.* ***Plaintiff's response to Form Interrogatory No. 9.1 concedes***
4 ***that there are no other damages that Plaintiff attributes to the incident. Id.***

5 Having failed to allege any actual medical expenses (or to describe any actual medical
6 expenses in his discovery responses or Opposition papers) Plaintiff cannot rely on nonexistent
7 medical expenses as an excuse to continue prosecuting this case in unlimited civil jurisdiction. *See,*
8 *e.g., Howell v. Hamilton Meats & Provisions, Inc.* (2011) 52 Cal.4th 541, 556 (a plaintiff may only
9 recover “*the lesser* of (a) the amount paid or incurred for medical services, and (b) the reasonable
10 value of the services”) (emphasis in original). If Plaintiff wished to rely on claimed medical
11 expenses to evade the reclassification of this case, the burden would have been on Plaintiff to allege
12 medical expenses in his Complaint, and disclose medical expenses in his discovery responses, or, at
13 minimum, present evidence of medical expenses in his Opposition. Plaintiff has done none of these
14 things, and has presented the Court with no basis to conclude that recovery for medical expenses is
15 available in this action. Similarly, Plaintiff cannot credibly demand compensation for pain and
16 suffering in excess of \$25,000 under the circumstances here, where by his own admission he has
17 not sought medical treatment, taken pain medication, or suffered any actual, tangible injury as a
18 result of this concocted incident.

19 (3) The “Nominal” Damages Claimed In Plaintiff’s Case Management
20 Statement Are Inherently Less Than The Jurisdictional Minimum Of This
21 Court

22 In the absence of actual medical expenses, Plaintiff’s only specific, identifiable claim of
23 damages is his admission in his Case Management Statement that he is effectively seeking only
24 “*nominal*” damages, plus punitive damages. Of course, as explained in the Motion, “*nominal*”
25 damages are by definition trivial in amount, and normally consist of only a few cents or a dollar.
26 Plaintiff’s reliance on his claim for punitive damages is misplaced. As already explained in the
27 Motion, punitive damages are limited to a single-digit multiple of any actual damages, absent
28 exceptional circumstances not alleged (or capable of being alleged) here. *Gober v. Ralphs Grocery*

1 Co. (2006) 137 Cal.App.4th 204, 215. Any single-digit multiple of the mere “nominal” damages
2 identified by Plaintiff in his Case Management Statement would *necessarily* be less than \$25,000,
3 and thus less than the jurisdictional minimum of this Court.

4 B. Defendants Have Brought This Motion Within A Reasonable Time

5 As detailed in the Motion, Defendants had hoped to avoid the need to incur the expense and
6 time of a formal motion to reclassify, given the obvious triviality and of Plaintiff’s claims. After
7 Plaintiff’s Case Management Statement clarified the “nominal” nature of his claimed damages,
8 Defendants sought twice to reach a stipulation with Plaintiff to reclassify the case, first requesting
9 reclassification in November of 2018, and again in July of 2019. Plaintiff refused, though not
10 immediately.⁴ In the ensuing months, Defendants also engaged in discussions with Plaintiff in the
11 hope of resolving this matter and obtaining a dismissal of Infinitum Nihil. Under the
12 circumstances, and given the *de minimis* and patently false nature of Plaintiff’s claims, Defendants
13 have acted reasonably to attempt to resolve this issue by stipulation prior to bringing the Motion,
14 and have not unreasonably delayed doing so.


15 3. CONCLUSION

16 For all the foregoing reasons, the Motion should be granted.

17
18 DATED: August 26, 2019

Respectfully submitted,

19 BROWN RUDNICK LLP

20
21 By: 
22 CAMILLE M. VASQUEZ
23 Attorneys for Defendants,
24 JOHN C. DEPP, II and INFINITUM NIHIL
25

26 ⁴ Counsel for Plaintiff incorrectly represents that Defendants did not raise the issue of reclassification in November
27 of 2018. In fact, as set forth in the Vasquez Decl. submitted with the Motion, counsel did raise the issue of
28 reclassification, and counsel for plaintiff responded that Plaintiff would likely be unwilling to stipulate to
reclassification, but did not completely foreclose on the possibility.

1 SUPPLEMENTAL DECLARATION OF CAMILLE M. VASQUEZ

2 I, CAMILLE M. VASQUEZ, declare as follows:

3 1. I am an attorney at law duly licensed to practice before the above-entitled Court, and
4 am an associate of the law firm of Brown Rudnick LLP, attorneys of record for Defendants John C.
5 Depp, II and Infinitum Nihil (collectively, the "Defendants").

6 2. I have first-hand personal knowledge of the matters set forth herein, and if called
7 upon as a witness, would and could competently testify thereto.

8 3. This supplemental declaration is submitted in support of Defendants' Reply to
9 Opposition to Motion to Reclassify ("Reply"). Unless otherwise stated, all capitalized terms have
10 the same meaning as in the Reply.

11 4. A true and correct copy of Defendant John C. Depp's General Form Interrogatories -
12 Set One, is attached hereto as Exhibit "1." A true and correct copy of Plaintiff's Responses to
13 General Form Interrogatories - Set One, is attached hereto as Exhibit "2." A true and correct copy
14 of Plaintiff's Supplemental Responses to General Form Interrogatories - Set One is attached hereto
15 as Exhibit "3."

16 I declare under penalty of perjury under the laws of the State of California that the
17 foregoing is true and correct.

18 Executed August 26, 2019, at Irvine, California.

19
20 
21 CAMILLE M. VASQUEZ

Exhibit 1

| | |
|---|--------------------------|
| ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): BROWN RUDNICK LLP RANDALL A. SMITH, #116244 / CAMILLE M. VASQUEZ, #273377 2211 Michelson Drive, 7th Floor Irvine, CA 92612 TELEPHONE NO.: (949) 752-7100 FAX NO. (Optional): (949) 252-1514 E-MAIL ADDRESS (Optional): rsmith@brownrudnick.com / cvasquez@brownrudnick.com ATTORNEY FOR (Name): John C. Depp, II and Infinitum Nihil | |
| SUPERIOR COURT OF CALIFORNIA, COUNTY OF LOS ANGELES | |
| SHORT TITLE OF CASE: BROOKS VS JOHN C. DEPP, ET AL. | |
| <p style="text-align: center;">FORM INTERROGATORIES—GENERAL</p> <p>Asking Party: JOHN C. DEPP, II</p> <p>Answering Party: GREGG "ROCKY" BROOKS</p> <p>Set No.: ONE</p> | CASE NUMBER: BC713123 |

Sec. 1. Instructions to All Parties

- (a) Interrogatories are written questions prepared by a party to an action that are sent to any other party in the action to be answered under oath. The interrogatories below are form interrogatories approved for use in civil cases.
- (b) For time limitations, requirements for service on other parties, and other details, see Code of Civil Procedure sections 2030.010–2030.410 and the cases construing those sections.
- (c) These form interrogatories do not change existing law relating to interrogatories nor do they affect an answering party's right to assert any privilege or make any objection.

Sec. 2. Instructions to the Asking Party

- (a) These interrogatories are designed for optional use by parties in unlimited civil cases where the amount demanded exceeds \$25,000. Separate interrogatories, Form *Interrogatories—Limited Civil Cases (Economic Litigation)* (form DISC-004), which have no subparts, are designed for use in limited civil cases where the amount demanded is \$25,000 or less; however, those interrogatories may also be used in unlimited civil cases.
- (b) Check the box next to each interrogatory that you want the answering party to answer. Use care in choosing those interrogatories that are applicable to the case.
- (c) You may insert your own definition of **INCIDENT** in Section 4, but only where the action arises from a course of conduct or a series of events occurring over a period of time.
- (d) The interrogatories in section 16.0, Defendant's Contentions—Personal Injury, should not be used until the defendant has had a reasonable opportunity to conduct an investigation or discovery of plaintiff's injuries and damages.
- (e) Additional interrogatories may be attached.

Sec. 3. Instructions to the Answering Party

- (a) An answer or other appropriate response must be given to each interrogatory checked by the asking party.
- (b) As a general rule, within 30 days after you are served with these interrogatories, you must serve your responses on the asking party and serve copies of your responses on all other parties to the action who have appeared. See Code of Civil Procedure sections 2030.260–2030.270 for details.

- (c) Each answer must be as complete and straightforward as the information reasonably available to you, including the information possessed by your attorneys or agents, permits. If an interrogatory cannot be answered completely, answer it to the extent possible.
- (d) If you do not have enough personal knowledge to fully answer an interrogatory, say so, but make a reasonable and good faith effort to get the information by asking other persons or organizations, unless the information is equally available to the asking party.
- (e) Whenever an interrogatory may be answered by referring to a document, the document may be attached as an exhibit to the response and referred to in the response. If the document has more than one page, refer to the page and section where the answer to the interrogatory can be found.
- (f) Whenever an address and telephone number for the same person are requested in more than one interrogatory, you are required to furnish them in answering only the first interrogatory asking for that information.
- (g) If you are asserting a privilege or making an objection to an interrogatory, you must specifically assert the privilege or state the objection in your written response.
- (h) Your answers to these interrogatories must be verified, dated, and signed. You may wish to use the following form at the end of your answers:

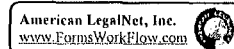
I declare under penalty of perjury under the laws of the State of California that the foregoing answers are true and correct.

_____ (DATE) _____ (SIGNATURE)

Sec. 4. Definitions

Words in **BOLDFACE CAPITALS** in these interrogatories are defined as follows:

- (a) (Check one of the following):
 - (1) **INCIDENT** includes the circumstances and events surrounding the alleged accident, injury, or other occurrence or breach of contract giving rise to this action or proceeding.



- (2) **INCIDENT** means (insert your definition here or on a separate, attached sheet labeled "Sec. 4(a)(2)"):

The alleged altercation between Gregg "Rocky" Brooks and John C. Depp, II that took place on or about April 13, 2018 as alleged in the Complaint.

(b) **YOU OR ANYONE ACTING ON YOUR BEHALF** includes you, your agents, your employees, your insurance companies, your agents, their employees, your attorneys, your accountants, your investigators, and anyone else acting on your behalf.

(c) **PERSON** includes a natural person, firm, association, organization, partnership, business, trust, limited liability company, corporation, or public entity.

(d) **DOCUMENT** means a writing, as defined in Evidence Code section 250, and includes the original or a copy of handwriting, typewriting, printing, photostats, photographs, electronically stored information, and every other means of recording upon any tangible thing and form of communicating or representation, including letters, words, pictures, sounds, or symbols, or combinations of them.

(e) **HEALTH CARE PROVIDER** includes any **PERSON** referred to in Code of Civil Procedure section 667.7(e)(3).

(f) **ADDRESS** means the street address, including the city, state, and zip code.

Sec. 5. Interrogatories

The following interrogatories have been approved by the Judicial Council under Code of Civil Procedure section 2033.710:

CONTENTS

- 1.0 Identity of Persons Answering These Interrogatories
- 2.0 General Background Information—Individual
- 3.0 General Background Information—Business Entity
- 4.0 Insurance
- 5.0 [Reserved]
- 6.0 Physical, Mental, or Emotional Injuries
- 7.0 Property Damage
- 8.0 Loss of Income or Earning Capacity
- 9.0 Other Damages
- 10.0 Medical History
- 11.0 Other Claims and Previous Claims
- 12.0 Investigation—General
- 13.0 Investigation—Surveillance
- 14.0 Statutory or Regulatory Violations
- 15.0 Denials and Special or Affirmative Defenses
- 16.0 Defendant's Contentions Personal Injury
- 17.0 Responses to Request for Admissions
- 18.0 [Reserved]
- 19.0 [Reserved]
- 20.0 How the Incident Occurred—Motor Vehicle
- 25.0 [Reserved]
- 30.0 [Reserved]
- 40.0 [Reserved]
- 50.0 Contract
- 60.0 [Reserved]
- 70.0 Unlawful Detainer [See separate form DISC-003]
- 101.0 Economic Litigation [See separate form DISC-004]
- 200.0 Employment Law [See separate form DISC-002]
- Family Law [See separate form FL-145]

1.0 Identity of Persons Answering These Interrogatories

- 1.1 State the name, **ADDRESS**, telephone number, and relationship to you of each **PERSON** who prepared or assisted in the preparation of the responses to these interrogatories. (Do not identify anyone who simply typed or reproduced the responses.)

2.0 General Background Information—individual

- 2.1 State:
 - (a) your name;
 - (b) every name you have used in the past; and
 - (c) the dates you used each name.
- 2.2 State the date and place of your birth.
- 2.3 At the time of the **INCIDENT**, did you have a driver's license? If so state:
 - (a) the state or other issuing entity;
 - (b) the license number and type;
 - (c) the date of issuance; and
 - (d) all restrictions.
- 2.4 At the time of the **INCIDENT**, did you have any other permit or license for the operation of a motor vehicle? If so, state:
 - (a) the state or other issuing entity;
 - (b) the license number and type;
 - (c) the date of issuance; and
 - (d) all restrictions.
- 2.5 State:
 - (a) your present residence **ADDRESS**;
 - (b) your residence **ADDRESSES** for the past five years; and
 - (c) the dates you lived at each **ADDRESS**.
- 2.6 State:
 - (a) the name, **ADDRESS**, and telephone number of your present employer or place of self-employment; and
 - (b) the name, **ADDRESS**, dates of employment, job title, and nature of work for each employer or self-employment you have had from five years before the **INCIDENT** until today.
- 2.7 State:
 - (a) the name and **ADDRESS** of each school or other academic or vocational institution you have attended, beginning with high school;
 - (b) the dates you attended;
 - (c) the highest grade level you have completed; and
 - (d) the degrees received.
- 2.8 Have you ever been convicted of a felony? If so, for each conviction state:
 - (a) the city and state where you were convicted;
 - (b) the date of conviction;
 - (c) the offense; and
 - (d) the court and case number.
- 2.9 Can you speak English with ease? If not, what language and dialect do you normally use?
- 2.10 Can you read and write English with ease? If not, what language and dialect do you normally use?

- 2.11 At the time of the **INCIDENT** were you acting as an agent or employee for any **PERSON**? If so, state:
- (a) the name, **ADDRESS**, and telephone number of that **PERSON**; and
- (b) a description of your duties.
- 2.12 At the time of the **INCIDENT** did you or any other person have any physical, emotional, or mental disability or condition that may have contributed to the occurrence of the **INCIDENT**? If so, for each person state:
- (a) the name, **ADDRESS**, and telephone number;
- (b) the nature of the disability or condition; and
- (c) the manner in which the disability or condition contributed to the occurrence of the **INCIDENT**.
- 2.13 Within 24 hours before the **INCIDENT** did you or any person involved in the **INCIDENT** use or take any of the following substances: alcoholic beverage, marijuana, or other drug or medication of any kind (prescription or not)? If so, for each person state:
- (a) the name, **ADDRESS**, and telephone number;
- (b) the nature or description of each substance;
- (c) the quantity of each substance used or taken;
- (d) the date and time of day when each substance was used or taken;
- (e) the **ADDRESS** where each substance was used or taken;
- (f) the name, **ADDRESS**, and telephone number of each person who was present when each substance was used or taken; and
- (g) the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who prescribed or furnished the substance and the condition for which it was prescribed or furnished.
- 3.0 General Background Information—Business Entity**
- 3.1 Are you a corporation? If so, state:
- (a) the name stated in the current articles of incorporation;
- (b) all other names used by the corporation during the past 10 years and the dates each was used;
- (c) the date and place of incorporation;
- (d) the **ADDRESS** of the principal place of business; and
- (e) whether you are qualified to do business in California.
- 3.2 Are you a partnership? If so, state:
- (a) the current partnership name;
- (b) all other names used by the partnership during the past 10 years and the dates each was used;
- (c) whether you are a limited partnership and, if so, under the laws of what jurisdiction;
- (d) the name and **ADDRESS** of each general partner; and
- (e) the **ADDRESS** of the principal place of business.
- 3.3 Are you a limited liability company? If so, state:
- (a) the name stated in the current articles of organization;
- (b) all other names used by the company during the past 10 years and the date each was used;
- (c) the date and place of filing of the articles of organization;
- (d) the **ADDRESS** of the principal place of business; and
- (e) whether you are qualified to do business in California.
- 3.4 Are you a joint venture? If so, state:
- (a) the current joint venture name;
- (b) all other names used by the joint venture during the past 10 years and the dates each was used;
- (c) the name and **ADDRESS** of each joint venturer; and
- (d) the **ADDRESS** of the principal place of business.
- 3.5 Are you an unincorporated association? If so, state:
- (a) the current unincorporated association name;
- (b) all other names used by the unincorporated association during the past 10 years and the dates each was used; and
- (c) the **ADDRESS** of the principal place of business.
- 3.6 Have you done business under a fictitious name during the past 10 years? If so, for each fictitious name state:
- (a) the name;
- (b) the dates each was used;
- (c) the state and county of each fictitious name filing; and
- (d) the **ADDRESS** of the principal place of business.
- 3.7 Within the past five years has any public entity registered or licensed your business? If so, for each license or registration:
- (a) identify the license or registration;
- (b) state the name of the public entity; and
- (c) state the dates of issuance and expiration.
- 4.0 Insurance**
- 4.1 At the time of the **INCIDENT**, was there in effect any policy of insurance through which you were or might be insured in any manner (for example, primary, pro-rata, or excess liability coverage or medical expense coverage) for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, for each policy state:
- (a) the kind of coverage;
- (b) the name and **ADDRESS** of the insurance company;
- (c) the name, **ADDRESS**, and telephone number of each named insured;
- (d) the policy number;
- (e) the limits of coverage for each type of coverage contained in the policy;
- (f) whether any reservation of rights or controversy or coverage dispute exists between you and the insurance company; and
- (g) the name, **ADDRESS**, and telephone number of the custodian of the policy.
- 4.2 Are you self-insured under any statute for the damages, claims, or actions that have arisen out of the **INCIDENT**? If so, specify the statute.
- 5.0 [Reserved]**
- 6.0 Physical, Mental, or Emotional Injuries**
- 6.1 Do you attribute any physical, mental, or emotional injuries to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 6.2 through 6.7).
- 6.2 Identify each injury you attribute to the **INCIDENT** and the area of your body affected.

- 6.3 Do you still have any complaints that you attribute to the **INCIDENT**? If so, for each complaint state:
- a description;
 - whether the complaint is subsiding, remaining the same, or becoming worse; and
 - the frequency and duration.

- 6.4 Did you receive any consultation or examination (except from expert witnesses covered by Code of Civil Procedure sections 2034.210-2034.310) or treatment from a **HEALTH CARE PROVIDER** for any injury you attribute to the **INCIDENT**? If so, for each **HEALTH CARE PROVIDER** state:

- the name, **ADDRESS**, and telephone number;
- the type of consultation, examination, or treatment provided;
- the dates you received consultation, examination, or treatment; and
- the charges to date.

- 6.5 Have you taken any medication, prescribed or not, as a result of injuries that you attribute to the **INCIDENT**? If so, for each medication state:

- the name;
- the **PERSON** who prescribed or furnished it;
- the date it was prescribed or furnished;
- the dates you began and stopped taking it; and
- the cost to date.

- 6.6 Are there any other medical services necessitated by the injuries that you attribute to the **INCIDENT** that were not previously listed (for example, ambulance, nursing, prosthetics)? If so, for each service state:

- the nature;
- the date;
- the cost; and
- the name, **ADDRESS**, and telephone number of each provider.

- 6.7 Has any **HEALTH CARE PROVIDER** advised that you may require future or additional treatment for any injuries that you attribute to the **INCIDENT**? If so, for each injury state:

- the name and **ADDRESS** of each **HEALTH CARE PROVIDER**;
- the complaints for which the treatment was advised; and
- the nature, duration, and estimated cost of the treatment.

7.0 Property Damage

- 7.1 Do you attribute any loss of or damage to a vehicle or other property to the **INCIDENT**? If so, for each item of property:

- describe the property;
- describe the nature and location of the damage to the property;

- state the amount of damage you are claiming for each item of property and how the amount was calculated; and
- if the property was sold, state the name, **ADDRESS**, and telephone number of the seller, the date of sale, and the sale price.

- 7.2 Has a written estimate or evaluation been made for any item of property referred to in your answer to the preceding interrogatory? If so, for each estimate or evaluation state:

- the name, **ADDRESS**, and telephone number of the **PERSON** who prepared it and the date prepared;
- the name, **ADDRESS**, and telephone number of each **PERSON** who has a copy of it; and
- the amount of damage stated.

- 7.3 Has any item of property referred to in your answer to interrogatory 7.1 been repaired? If so, for each item state:

- the date repaired;
- a description of the repair;
- the repair cost;
- the name, **ADDRESS**, and telephone number of the **PERSON** who repaired it;
- the name, **ADDRESS**, and telephone number of the **PERSON** who paid for the repair.

8.0 Loss of Income or Earning Capacity

- 8.1 Do you attribute any loss of income or earning capacity to the **INCIDENT**? (If your answer is "no," do not answer interrogatories 8.2 through 8.8).

- 8.2 State:

- the nature of your work;
- your job title at the time of the **INCIDENT**; and
- the date your employment began.

- 8.3 State the last date before the **INCIDENT** that you worked for compensation.

- 8.4 State your monthly income at the time of the **INCIDENT** and how the amount was calculated.

- 8.5 State the date you returned to work at each place of employment following the **INCIDENT**.

- 8.6 State the dates you did not work and for which you lost income as a result of the **INCIDENT**.

- 8.7 State the total income you have lost to date as a result of the **INCIDENT** and how the amount was calculated.

- 8.8 Will you lose income in the future as a result of the **INCIDENT**? If so, state:

- the facts upon which you base this contention;
- an estimate of the amount;
- an estimate of how long you will be unable to work; and
- how the claim for future income is calculated.

9.0 Other Damages

- 9.1 Are there any other damages that you attribute to the **INCIDENT**? If so, for each item of damage state:
- the nature;
 - the date it occurred;
 - the amount; and
 - the name, **ADDRESS**, and telephone number of each **PERSON** to whom an obligation was incurred.

- 9.2 Do any **DOCUMENTS** support the existence or amount of any item of damages claimed in interrogatory 9.1? If so, describe each document and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

10.0 Medical History

- 10.1 At any time before the **INCIDENT** did you have complaints or injuries that involved the same part of your body claimed to have been injured in the **INCIDENT**? If so, for each state:

- a description of the complaint or injury;
- the dates it began and ended; and
- the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** whom you consulted or who examined or treated you.

- 10.2 List all physical, mental, and emotional disabilities you had immediately before the **INCIDENT**. (*You may omit mental or emotional disabilities unless you attribute any mental or emotional injury to the **INCIDENT**.*)

- 10.3 At any time after the **INCIDENT**, did you sustain injuries of the kind for which you are now claiming damages? If so, for each incident giving rise to an injury state:

- the date and the place it occurred;
- the name, **ADDRESS**, and telephone number of any other **PERSON** involved;
- the nature of any injuries you sustained;
- the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER** who you consulted or who examined or treated you; and
- the nature of the treatment and its duration.

11.0 Other Claims and Previous Claims

- 11.1 Except for this action, in the past 10 years have you filed an action or made a written claim or demand for compensation for your personal injuries? If so, for each action, claim, or demand state:

- the date, time, and place and location (closest street **ADDRESS** or intersection) of the **INCIDENT** giving rise to the action, claim, or demand;
- the name, **ADDRESS**, and telephone number of each **PERSON** against whom the claim or demand was made or the action filed;

- the court, names of the parties, and case number of any action filed;
- the name, **ADDRESS**, and telephone number of any attorney representing you;
- whether the claim or action has been resolved or is pending; and
- a description of the injury.

- 11.2 In the past 10 years have you made a written claim or demand for workers' compensation benefits? If so, for each claim or demand state:

- the date, time, and place of the **INCIDENT** giving rise to the claim;
- the name, **ADDRESS**, and telephone number of your employer at the time of the injury;
- the name, **ADDRESS**, and telephone number of the workers' compensation insurer and the claim number;
- the period of time during which you received workers' compensation benefits;
- a description of the injury;
- the name, **ADDRESS**, and telephone number of any **HEALTH CARE PROVIDER** who provided services; and
- the case number at the Workers' Compensation Appeals Board.

12.0 Investigation—General

- 12.1 State the name, **ADDRESS**, and telephone number of each individual:

- who witnessed the **INCIDENT** or the events occurring immediately before or after the **INCIDENT**;
- who made any statement at the scene of the **INCIDENT**;
- who heard any statements made about the **INCIDENT** by any individual at the scene; and
- who **YOU OR ANYONE ACTING ON YOUR BEHALF** claim has knowledge of the **INCIDENT** (except for expert witnesses covered by Code of Civil Procedure section 2034).

- 12.2 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** interviewed any individual concerning the **INCIDENT**? If so, for each individual state:

- the name, **ADDRESS**, and telephone number of the individual interviewed;
- the date of the interview; and
- the name, **ADDRESS**, and telephone number of the **PERSON** who conducted the interview.

- 12.3 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** obtained a written or recorded statement from any individual concerning the **INCIDENT**? If so, for each statement state:

- the name, **ADDRESS**, and telephone number of the individual from whom the statement was obtained;
- the name, **ADDRESS**, and telephone number of the individual who obtained the statement;
- the date the statement was obtained; and
- the name, **ADDRESS**, and telephone number of each **PERSON** who has the original statement or a copy.

12.4 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any photographs, films, or videotapes depicting any place, object, or individual concerning the **INCIDENT** or plaintiff's injuries? If so, state:

- (a) the number of photographs or feet of film or videotape;
- (b) the places, objects, or persons photographed, filmed, or videotaped;
- (c) the date the photographs, films, or videotapes were taken;
- (d) the name, **ADDRESS**, and telephone number of the individual taking the photographs, films, or videotapes; and
- (e) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the photographs, films, or videotapes.

12.5 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** know of any diagram, reproduction, or model of any place or thing (except for items developed by expert witnesses covered by Code of Civil Procedure sections 2034.210-2034.310) concerning the **INCIDENT**? If so, for each item state:

- (a) the type (i.e., diagram, reproduction, or model);
- (b) the subject matter; and
- (c) the name, **ADDRESS**, and telephone number of each **PERSON** who has it.

12.6 Was a report made by any **PERSON** concerning the **INCIDENT**? If so, state:

- (a) the name, title, identification number, and employer of the **PERSON** who made the report;
- (b) the date and type of report made;
- (c) the name, **ADDRESS**, and telephone number of the **PERSON** for whom the report was made; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of the report.

12.7 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** inspected the scene of the **INCIDENT**? If so, for each inspection state:

- (a) the name, **ADDRESS**, and telephone number of the individual making the inspection (except for expert witnesses covered by Code of Civil Procedure sections 2034.210-2034.310); and
- (b) the date of the inspection.

13.0 Investigation—Surveillance

13.1 Have **YOU OR ANYONE ACTING ON YOUR BEHALF** conducted surveillance of any individual involved in the **INCIDENT** or any party to this action? If so, for each surveillance state:

- (a) the name, **ADDRESS**, and telephone number of the individual or party;
- (b) the time, date, and place of the surveillance;
- (c) the name, **ADDRESS**, and telephone number of the individual who conducted the surveillance; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy of any surveillance photograph, film, or videotape.

13.2 Has a written report been prepared on the surveillance? If so, for each written report state:

- (a) the title;
- (b) the date;
- (c) the name, **ADDRESS**, and telephone number of the individual who prepared the report; and
- (d) the name, **ADDRESS**, and telephone number of each **PERSON** who has the original or a copy.

14.0 Statutory or Regulatory Violations

14.1 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** contend that any **PERSON** involved in the **INCIDENT** violated any statute, ordinance, or regulation and that the violation was a legal (proximate) cause of the **INCIDENT**? If so, identify the name, **ADDRESS**, and telephone number of each **PERSON** and the statute, ordinance, or regulation that was violated.

14.2 Was any **PERSON** cited or charged with a violation of any statute, ordinance, or regulation as a result of this **INCIDENT**? If so, for each **PERSON** state:

- (a) the name, **ADDRESS**, and telephone number of the **PERSON**;
- (b) the statute, ordinance, or regulation allegedly violated;
- (c) whether the **PERSON** entered a plea in response to the citation or charge and, if so, the plea entered; and
- (d) the name and **ADDRESS** of the court or administrative agency, names of the parties, and case number.

15.0 Denials and Special or Affirmative Defenses

15.1 Identify each denial of a material allegation and each special or affirmative defense in your pleadings and for each:

- (a) state all facts upon which you base the denial or special or affirmative defense;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
- (c) identify all **DOCUMENTS** and other tangible things that support your denial or special or affirmative defense, and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

16.0 Defendant's Contentions—Personal Injury

16.1 Do you contend that any **PERSON**, other than you or plaintiff, contributed to the occurrence of the **INCIDENT** or the injuries or damages claimed by plaintiff? If so, for each **PERSON**:

- (a) state the name, **ADDRESS**, and telephone number of the **PERSON**;
- (b) state all facts upon which you base your contention;
- (c) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (d) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

16.2 Do you contend that plaintiff was not injured in the **INCIDENT**? If so:

- (a) state all facts upon which you base your contention;
- (b) state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
- (c) identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

- 16.3 Do you contend that the injuries or the extent of the injuries claimed by plaintiff as disclosed in discovery proceedings thus far in this case were not caused by the **INCIDENT**? If so, for each injury:
- identify it;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.4 Do you contend that any of the services furnished by any **HEALTH CARE PROVIDER** claimed by plaintiff in discovery proceedings thus far in this case were not due to the **INCIDENT**? If so:
- identify each service;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.5 Do you contend that any of the costs of services furnished by any **HEALTH CARE PROVIDER** claimed as damages by plaintiff in discovery proceedings thus far in this case were not necessary or unreasonable? If so:
- identify each cost;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.6 Do you contend that any part of the loss of earnings or income claimed by plaintiff in discovery proceedings thus far in this case was unreasonable or was not caused by the **INCIDENT**? If so:
- identify each part of the loss;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.7 Do you contend that any of the property damage claimed by plaintiff in discovery Proceedings thus far in this case was not caused by the **INCIDENT**? If so:
- identify each item of property damage;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.8 Do you contend that any of the costs of repairing the property damage claimed by plaintiff in discovery proceedings thus far in this case were unreasonable? If so:
- identify each cost item;
 - state all facts upon which you base your contention;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of the facts; and
 - identify all **DOCUMENTS** and other tangible things that support your contention and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.
- 16.9 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** (for example, insurance bureau index reports) concerning claims for personal injuries made before or after the **INCIDENT** by a plaintiff in this case? If so, for each plaintiff state:
- the source of each **DOCUMENT**;
 - the date each claim arose;
 - the nature of each claim; and
 - the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.
- 16.10 Do **YOU OR ANYONE ACTING ON YOUR BEHALF** have any **DOCUMENT** concerning the past or present physical, mental, or emotional condition of any plaintiff in this case from a **HEALTH CARE PROVIDER** not previously identified (except for expert witnesses covered by Code of Civil Procedure sections 2034.210-2034.310)? If so, for each plaintiff state:
- the name, **ADDRESS**, and telephone number of each **HEALTH CARE PROVIDER**;
 - a description of each **DOCUMENT**; and
 - the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT**.

17.0 Responses to Request for Admissions

- 17.1 Is your response to each request for admission served with these interrogatories an unqualified admission? If not, for each response that is not an unqualified admission:
- state the number of the request;
 - state all facts upon which you base your response;
 - state the names, **ADDRESSES**, and telephone numbers of all **PERSONS** who have knowledge of those facts; and
 - identify all **DOCUMENTS** and other tangible things that support your response and state the name, **ADDRESS**, and telephone number of the **PERSON** who has each **DOCUMENT** or thing.

18.0 *[Reserved]*

19.0 *[Reserved]*

20.0 How the Incident Occurred—Motor Vehicle

- 20.1 State the date, time, and place of the **INCIDENT** (closest street **ADDRESS** or intersection).
- 20.2 For each vehicle involved in the **INCIDENT**, state:
- the year, make, model, and license number;
 - the name, **ADDRESS**, and telephone number of the driver;

- (c) the name, **ADDRESS**, and telephone number of each occupant other than the driver;
- (d) the name, **ADDRESS**, and telephone number of each registered owner;
- (e) the name, **ADDRESS**, and telephone number of each lessee;
- (f) the name, **ADDRESS**, and telephone number of each owner other than the registered owner or lien holder; and
- (g) the name of each owner who gave permission or consent to the driver to operate the vehicle.
- 20.3 State the **ADDRESS** and location where your trip began and the **ADDRESS** and location of your destination.
- 20.4 Describe the route that you followed from the beginning of your trip to the location of the **INCIDENT**, and state the location of each stop, other than routine traffic stops, during the trip leading up to the **INCIDENT**.
- 20.5 State the name of the street or roadway, the lane of travel, and the direction of travel of each vehicle involved in the **INCIDENT** for the 500 feet of travel before the **INCIDENT**.
- 20.6 Did the **INCIDENT** occur at an intersection? If so, describe all traffic control devices, signals, or signs at the intersection.
- 20.7 Was there a traffic signal facing you at the time of the **INCIDENT**? If so, state:
- (a) your location when you first saw it;
- (b) the color;
- (c) the number of seconds it had been that color; and
- (d) whether the color changed between the time you first saw it and the **INCIDENT**.
- 20.8 State how the **INCIDENT** occurred, giving the speed, direction, and location of each vehicle involved:
- (a) just before the **INCIDENT**;
- (b) at the time of the **INCIDENT**; and (c) just after the **INCIDENT**.
- 20.9 Do you have information that a malfunction or defect in a vehicle caused the **INCIDENT**? If so:
- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and
- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.
- 20.10 Do you have information that any malfunction or defect in a vehicle contributed to the injuries sustained in the **INCIDENT**? If so:
- (a) identify the vehicle;
- (b) identify each malfunction or defect;
- (c) state the name, **ADDRESS**, and telephone number of each **PERSON** who is a witness to or has information about each malfunction or defect; and
- (d) state the name, **ADDRESS**, and telephone number of each **PERSON** who has custody of each defective part.
- 20.11 State the name, **ADDRESS**, and telephone number of each owner and each **PERSON** who has had possession since the **INCIDENT** of each vehicle involved in the **INCIDENT**.
- 25.0 [Reserved]
- 30.0 [Reserved]
- 40.0 [Reserved]
- 50.0 Contract
- 50.1 For each agreement alleged in the pleadings:
- (a) identify each **DOCUMENT** that is part of the agreement and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (b) state each part of the agreement not in writing, the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to that provision, and the date that part of the agreement was made;
- (c) identify all **DOCUMENTS** that evidence any part of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (d) identify all **DOCUMENTS** that are part of any modification to the agreement, and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**;
- (e) state each modification not in writing, the date, and the name, **ADDRESS**, and telephone number of each **PERSON** agreeing to the modification, and the date the modification was made;
- (f) identify all **DOCUMENTS** that evidence any modification of the agreement not in writing and for each state the name, **ADDRESS**, and telephone number of each **PERSON** who has the **DOCUMENT**.
- 50.2 Was there a breach of any agreement alleged in the pleadings? If so, for each breach describe and give the date of every act or omission that you claim is the breach of the agreement.
- 50.3 Was performance of any agreement alleged in the pleadings excused? If so, identify each agreement excused and state why performance was excused.
- 50.4 Was any agreement alleged in the pleadings terminated by mutual agreement, release, accord and satisfaction, or novation? If so, identify each agreement terminated, the date of termination, and the basis of the termination.
- 50.5 Is any agreement alleged in the pleadings unenforceable? If so, identify each unenforceable agreement and state why it is unenforceable.
- 50.6 Is any agreement alleged in the pleadings ambiguous? If so, identify each ambiguous agreement and state why it is ambiguous.
- 60.0 [Reserved]

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA,
COUNTY OF ORANGE

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Orange, State of California. My business address is 2211 Michelson Drive, Seventh Floor, Irvine, CA 92612.

On August 27, 2018, I served true copies of the following document(s) described as **FIRST SET OF FORM INTERROGATORIES—GENERAL TO PLAINTIFF GREGG “ROCKY” BROOKS** on the interested parties in this action as follows:

Arbella Azizian, Esq.
Baker, Olson, LeCroy & Danielian
100 West Broadway Blvd., Suite 990
Glendale, CA 91210
Telephone: (818) 502-5600
Facsimile: (818) 241-2653
Email: azizian@boldlaw.com

Attorneys for Plaintiff
GREGG “ROCKY” BROOKS

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 Brown Rudnick LLP's practice for collecting and processing correspondence for mailing. On the same day that the 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 declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on August 27, 2018, at Irvine, California.



CASEY SUDA

Exhibit 2

BAKER, OLSON, LeCROY & DANIELIAN
101 West Broadway, Suite 601
Glendale, CA 91210

1 Arbella Azizian # 294696
2 BAKER, OLSON, LeCROY & DANIELIAN
3 100 W. BROADWAY # 990
4 GLENDALE, CA 91210
5 T: 818 502 5600
6 F. 818 241 2653
7 azizian@boldlaw.com

8 Attorneys for Plaintiff
9 Gregg "Rocky" Brooks

10 SUPERIOR COURT OF CALIFORNIA; COUNTY OF LOS ANGELES

11 GREGG "ROCKY" BROOKS
12
13 Plaintiff,

Case No.: BC713123

RESPONSES TO GENERAL FORM
INTERROGATORIES – SET ONE

14 v.
15 JOHN C. DEPP, an individual; MIRIAM
16 SEGAL, an individual; BRAD FURMAN,
17 an individual; INFINITUM NIHIL, A
18 Californian Corporation; And DOES 1-50

19 PROPOUNDING PARTY: John C. Depp

20 RESPONDING PARTY: Gregg "Rocky" Brooks

21 SET: ONE

22 ANSWERING PARTY responds as follows to, PROPOUNDING PARTY'S GENERAL
23 FORM INTERROGATORIES SET ONE:

24 These responses are made solely for the purpose of and in relation to, this
25 action. Each response is given subject to all appropriate objections (including, but not
26 limited to, objections concerning competency, relevancy, materiality, propriety and
27 inadmissibility) which would require the exclusion of any statement contained herein, or
28 any document referred to herein, if these requests were asked of, or any statements

1 contained herein were made by, a witness present and testifying in court. All such
2 objections and ground are therefore reserved and may be interposed at the time of trial.

3 The party or parties on whose behalf these responses are given has not yet
4 completed his, her or its investigation of the facts relating to this action, and has not yet
5 completed preparation for trial.

6
7 The following responses are based upon information presently available to the
8 responding parties and are made without prejudice to the responding parties' right to
9 utilize and produce at the time of trial subsequently discovered evidence relating to the
10 proof of any material facts, and to produce all evidence, whenever discovered, relating
11 to the proof of facts subsequently discovered to be material.

12 Except for facts explicitly admitted herein, no incidental or implied admissions of
13 any nature whatsoever are intended hereby. The fact that any demand for production
14 herein has been answered should not be taken as an admission, acceptance or
15 concession of the existence of any facts set forth or assumed by such request, or that
16 such response constitutes admissible evidence or evidence of any fact thus set forth or
17 assumed, all request for production which assume facts are objected to on that basis,
18 and any response provided thereto is provided without waiving such objection. The fact
19 that the party on whose behalf these responses are given has answered part or all of
20 any demand for production is not intended and should not be construed as a waiver by
21 the responding party of all or any part of any objection to any interrogatory.

22
23
24
25 FORM INTERROGATORIES

- 26 1 a) Gregg "Rocky" Brooks
27 b) Rocky Brooks
28 c) 2/25/61

- 1 **2.2** Date of Birth: 2/25/1,961 Place of Birth: Los Angeles
- 2 **2.3** Objection. Said interrogatory violates Responding Party's privacy rights, is
3 not relevant and is not reasonable calculated to lead to admissible
4 evidence.
- 5 **2.4** Objection. Said interrogatory is not relevant and is not reasonable
6 calculated to lead to admissible evidence. Plaintiff's driving ability is not at
7 issue.
- 7 **2.5** a) 9048 Gibson Street Los Angeles CA 90036
8 b) same
9 c) over 5 years
- 10 **2.6** a) Sumerian Pictures
11 b) see list attached as Exhibit A attached
- 12 **2.7** Objection. Said interrogatory violates Responding Party's privacy rights, is
13 not relevant and is not reasonable calculated to lead to admissible
14 evidence. Notwithstanding said objection, responding party states:
15 a) University High School 1977-1979 11800 Texas Ave, Los Angeles, CA
16 90025
17 b) Santa Barbara City College 1980 721 Cliff Dr, Santa Barbara, CA 93109
- 18 **2.8** No
- 19 **2.9** Yes
- 20 **2.10** Yes
- 21 **2.11** a) Good Film Production/Cast and Crew, 2300 West Empire Blvd. Burbank
22 CA 91504, 818-848-6022
23 b) Location Manager – duties include securing location with permits,
24 working with the city to secure permits, ensure production complies with
25 permits, ensure safety and security on set, coordinate with department
26 heads for production.
- 27 **2.12** Plaintiff was not suffering from any physical, emotional or mental disability
28 or condition at the time of the **Incident**. Plaintiff did have a prior neck and back
injury unrelated and unaffected by this incident. Furthermore, Plaintiff is unaware
of any possible physical, emotional or mental disability or condition any other
person may have been suffering at the time of the incident or whether any such
disability or condition contributed to the occurrence of the **Incident**.
- 2.13** Plaintiff did not use or take any alcoholic beverage, marijuana, or other

1 drug or medications of any kind.
2 a-b) On information and belief, Plaintiff believes Defendant Depp used or
3 took alcoholic beverages and marijuana but is without information as to whether
4 he may have used other drugs.
5 c) Plaintiff is unaware of the quantity of each substance used and taken
6 d-e) Plaintiff believes the substances were used on set during filming on
7 April 13, 2017
8 f) Paul Silver (323) 501-0538; Jerry Judge, Malcolm Connolly, Sean Bett
9 g) Plaintiff is unaware of any prescriptions.

- 7 **4.1** No
- 8 **4.2** No
- 9
- 10 **6.1** Yes
- 11 **6.2** Plaintiff suffers from anxiety, nervousness, stress and depression brought
12 on by the incident.
- 13 **6.3** a) Yes, Plaintiff suffers from anxiety, nervousness, stress and depression
14 b) The complaints remain and have been made worse by the lawsuit.
15 c) The issues are constant.
- 16 **6.4** No, however, due to the worsening of his condition, Plaintiff is seeking
17 treatment.
- 18 **6.5** No
- 19 **6.6** No
- 20 **6.7** No
- 21 **7.1** No
- 22 **7.2** No
- 23 **7.3** No
- 24
- 25 **8.1** Yes
- 26
- 27 //
- 28 //

1 **8.2** a) Location manager -duties include securing location with permits,
2 working with the city to secure permits, ensure production complies with permits,
3 ensure safety and security on set, coordinate with department heads for
4 production

5 b) location manager
6 c) February 2017

7 **8.3** Plaintiff worked in the days immediately preceding the incident starting in
8 February of 2017.

9 **8.4** Plaintiff earned over \$14,289. This is calculated based on the stated
10 weekly salary of \$2,967, plus a \$10 per day equipment allowance, plus an \$80
11 per day car allowance. Amount has not taken into account any benefits or
12 overtime.

13 **8.5** Plaintiff did not lose work immediately after incident due to injury. Given
14 the nature of Plaintiff's work, jobs are taken based on Plaintiff's availability.

15 **8.6** Plaintiff worked consistently prior to the incident and was generally offered
16 work whenever Plaintiff was available for work. Since being listed as available
17 for work in July, Plaintiff has been denied two jobs, each expected to run for
18 several months, because of this incident and the ensuing lawsuit.

19 **8.7** The lost jobs have resulted in a loss of approximately \$70,000 in income.
20 This is based on past earning potential combined with the expected length of the
21 assignment.

22 **9.1** No

23 **9.2** No

24 **10.1** No

25 **10.2** Plaintiff suffered neck and back injuries unrelated to this incident.

26 **10.3** No

27 **11.1** Objection. Said interrogatory violates Responding Party's privacy rights, is
28 not relevant and is not reasonable calculated to lead to admissible
evidence. Notwithstanding said objection, responding party states:

- a) 2011 car accident off 110 freeway near South Adams exist
- b) Plaintiff was struck by a drunk driver but does not recall the name of the driver.
- c) Plaintiff believes an action was filed in Los Angeles Superior Court but does not recall the case number.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

d) David Rosenberg 7120 Hayvenhurst Ave. Suite 321, Van Nuys CA 91406.

e) The matter was resolved.

f) neck and back injuries.

a) 2017 car accident middle of the day, near the 9th street exit near 110 freeway South.

b) Plaintiff does not recall the name of the driver.

c) Plaintiff believes an action was filed in Los Angeles Superior Court but does not recall the case number.

d) Tofer and Associates, 8889 W Olympic Blvd, Beverly Hills, CA 90211

e) The matter was resolved

f) neck and back injuries

11.2 No

12.1 a) Miguel Guterrez, 323-514-6847; John Rigg, 714-328-7156; Jason Gonet, 323-497-0933, Paul Silver, 323-501-0538, Jerry Judge, Malcolm Connolly, Sean Bett contact information unknown.

b) Jason Gonet filed a statement for Film LA

c) unknown

d) none

12.2 No

12.3 No however, discovery is ongoing and Plaintiff expects to subpoena possible written records of the incident.

12.4 No however, discovery is ongoing and Plaintiff will seek to discover any photographs or videotapes depicting the incident.

12.5 No

12.6 a) Yes. Jason Gonet, Film LA.

b) It is believed the report was made on the day of the incident

c) Film LA 6255 W. Sunset Blvd., 12th Floor Hollywood, CA 90028

Phone: (213) 977-8600.

d) Film LA 6255 W. Sunset Blvd., 12th Floor Hollywood, CA 90028

Phone: (213) 977-8600.

12.7 No

13.1 No

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

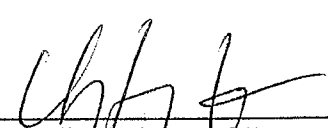
13.2 No

14.1 Defendant violated California Penal code § 240 and 242

14.2 No

DATED: 10/3/10

Baker, Olson, LeCroy & Danielian

by 
Arbella Azizian, Attorneys for
Gregg "Rocky" Brooks

BAKER OLSON LE CROY & DANIELIAN
101 West Broadway, Suite 600
Glendale, CA 91210

VERIFICATION


1
2
3
4
5
6
7
8
9
0
1
2
3
4
5
6
7
8

X I am the Plaintiff herein.

I have read the foregoing **Response to General Form Interrogatories - Set One** and know its contents. The matters stated therein are true of my own knowledge except as to those matters which are stated on information and belief, and as to those matters I believe them to be true.

Executed on OCT. 2, 2018, at 9098 Gibson St LA 90034
8 AM, CALIFORNIA.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.



Gregg "Rocky" Brooks

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

EXHIBIT A

Complete work history for BROOKS GREGG

| Employer# | Employer Name | From Date | To Date | Weeks | Union# | Local | Hours |
|-----------|--------------------------------------|------------|------------|-------|--------|-------|-----------|
| 13187 | CORPORATE MANAGEMENT SOLUTIONS, INC. | 10/08/2017 | 10/08/2017 | 0 | Union# | 33 | 12.0 |
| 13187 | CORPORATE MANAGEMENT SOLUTIONS, INC. | 10/05/2017 | 10/07/2017 | 1 | Union# | 33 | 36.0 |
| 21924 | HOMeward BOUND PRODUCTIONS, INC. | 09/18/2017 | 09/22/2017 | 0 | Union# | 46 | 60.0 |
| 21924 | HOMeward BOUND PRODUCTIONS, INC. | 09/11/2017 | 09/15/2017 | 0 | Union# | 46 | 60.0 |
| 21924 | HOMeward BOUND PRODUCTIONS, INC. | 09/04/2017 | 09/08/2017 | 0 | Union# | 46 | 60.0 |
| 21795 | STARZ POUR VIDA PRODUCTIONS, L.L.C. | 07/16/2017 | 07/22/2017 | 1 | Union# | 36 | 60.0 |
| 21795 | STARZ POUR VIDA PRODUCTIONS, L.L.C. | 07/09/2017 | 07/15/2017 | 1 | Union# | 36 | 24.0 |
| 21795 | STARZ POUR VIDA PRODUCTIONS, L.L.C. | 06/18/2017 | 06/24/2017 | 1 | Union# | 36 | 60.0 |
| 20235 | GOOD FILM PRODUCTIONS US, INC. | 04/16/2017 | 04/22/2017 | 1 | Union# | 36 | 24.0 |
| 20235 | GOOD FILM PRODUCTIONS US, INC. | 04/09/2017 | 04/15/2017 | 1 | Union# | 36 | 60.0 |
| 20235 | GOOD FILM PRODUCTIONS US, INC. | 04/02/2017 | 04/08/2017 | 1 | Union# | 36 | 60.0 |
| 20235 | GOOD FILM PRODUCTIONS US, INC. | 03/05/2017 | 03/11/2017 | 1 | Union# | 36 | 60.0 |
| 20235 | GOOD FILM PRODUCTIONS US, INC. | 02/26/2017 | 03/04/2017 | 1 | Union# | 36 | 60.0 |
| 20235 | GOOD FILM PRODUCTIONS US, INC. | 02/19/2017 | 02/25/2017 | 1 | Union# | 36 | 60.0 |
| 20235 | GOOD FILM PRODUCTIONS US, INC. | 02/12/2017 | 02/18/2017 | 1 | Union# | 36 | 60.0 |
| 20235 | GOOD FILM PRODUCTIONS US, INC. | 02/05/2017 | 02/11/2017 | 1 | Union# | 36 | 36.0 |
| 21536 | SB 2015, L.L.C. | 01/29/2017 | 02/04/2017 | 1 | Union# | 36 | 12.0 |
| 21536 | SB 2015, L.L.C. | 01/22/2017 | 01/28/2017 | 1 | Union# | 36 | 24.0 |
| 3027 | @ RADICAL MEDIA, L.L.C. | 01/12/2017 | 01/13/2017 | 0 | Union# | 33 | 24.0 |
| 12515 | BACKYARD PRODUCTIONS, L.L.C. | 01/01/2017 | 01/07/2017 | 1 | Union# | 33 | 12.0 |
| 20265 | MODOP FILMS, L.L.C. | 10/30/2016 | 11/05/2016 | 1 | Union# | 33 | 12.0 |
| 21044 | HIDDEN TEMPLE PRODUCTIONS, INC. | 04/17/2016 | 04/23/2016 | 1 | Union# | 36 | 60.0 |
| 21044 | HIDDEN TEMPLE PRODUCTIONS, INC. | 04/10/2016 | 04/16/2016 | 1 | Union# | 36 | 60.0 |
| 21044 | HIDDEN TEMPLE PRODUCTIONS, INC. | 04/03/2016 | 04/09/2016 | 1 | Union# | 36 | 60.0 |
| 21044 | HIDDEN TEMPLE PRODUCTIONS, INC. | 03/27/2016 | 04/02/2016 | 1 | Union# | 36 | 60.0 |
| 21044 | HIDDEN TEMPLE PRODUCTIONS, INC. | 03/20/2016 | 03/26/2016 | 1 | Union# | 36 | 60.0 (L) |
| 21044 | HIDDEN TEMPLE PRODUCTIONS, INC. | 03/13/2016 | 03/19/2016 | 1 | Union# | 36 | 48.0 (L) |
| 20904 | DUDE 2016, L.L.C. | 12/13/2015 | 12/19/2015 | 1 | Union# | 46 | 75.0 |
| 20904 | DUDE 2016, L.L.C. | 12/06/2015 | 12/12/2015 | 1 | Union# | 46 | 60.0 |
| 20904 | DUDE 2016, L.L.C. | 11/29/2015 | 12/05/2015 | 1 | Union# | 46 | 67.0 (L) |
| 20904 | DUDE 2016, L.L.C. | 11/15/2015 | 11/21/2015 | 1 | Union# | 46 | 60.0 (L) |
| 20904 | DUDE 2016, L.L.C. | 11/08/2015 | 11/14/2015 | 1 | Union# | 46 | 60.0 (L) |
| 20904 | DUDE 2016, L.L.C. | 11/01/2015 | 11/07/2015 | 1 | Union# | 46 | 60.0 (L) |
| 16026 | PRODCO, INC. | 08/16/2015 | 08/22/2015 | 1 | Union# | 46 | 24.0 |
| 16026 | PRODCO, INC. | 08/09/2015 | 08/15/2015 | 1 | Union# | 46 | 60.0 |
| 20575 | MAGIC BUBBLE PRODUCTIONS, L.L.C. | 07/05/2015 | 07/11/2015 | 1 | Union# | 46 | 60.0 |
| 20575 | MAGIC BUBBLE PRODUCTIONS, L.L.C. | 06/21/2015 | 06/27/2015 | 1 | Union# | 46 | 60.0 |
| 20575 | MAGIC BUBBLE PRODUCTIONS, L.L.C. | 06/14/2015 | 06/20/2015 | 1 | Union# | 46 | 60.0 |
| 20575 | MAGIC BUBBLE PRODUCTIONS, L.L.C. | 06/07/2015 | 06/13/2015 | 1 | Union# | 46 | 60.0 |
| 20575 | MAGIC BUBBLE PRODUCTIONS, L.L.C. | 05/31/2015 | 06/06/2015 | 1 | Union# | 46 | 60.0 |
| 20575 | MAGIC BUBBLE PRODUCTIONS, L.L.C. | 05/24/2015 | 05/30/2015 | 1 | Union# | 46 | 60.0 |
| 20575 | MAGIC BUBBLE PRODUCTIONS, L.L.C. | 05/17/2015 | 05/23/2015 | 1 | Union# | 46 | 60.0 (L) |
| 20575 | MAGIC BUBBLE PRODUCTIONS, L.L.C. | 05/10/2015 | 05/16/2015 | 1 | Union# | 46 | 60.0 (L) |
| 20575 | MAGIC BUBBLE PRODUCTIONS, L.L.C. | 05/03/2015 | 05/09/2015 | 1 | Union# | 46 | 60.0 (L) |
| 20438 | DOUBLEXPOSURE | 04/05/2015 | 04/25/2015 | 3 | Union# | 36 | 48.0 |
| 19709 | A IS A PRODUCTIONS, INC. | 02/02/2014 | 02/08/2014 | 1 | Union# | 46 | 60.0 |
| 19709 | A IS A PRODUCTIONS, INC. | 01/26/2014 | 02/01/2014 | 1 | Union# | 46 | 60.0 |
| 19709 | A IS A PRODUCTIONS, INC. | 01/19/2014 | 01/25/2014 | 1 | Union# | 46 | 60.0 (L) |
| 19709 | A IS A PRODUCTIONS, INC. | 01/12/2014 | 01/18/2014 | 1 | Union# | 46 | 60.0 (L) |
| 19709 | A IS A PRODUCTIONS, INC. | 01/05/2014 | 01/11/2014 | 1 | Union# | 46 | 60.0 (L) |
| 19709 | A IS A PRODUCTIONS, INC. | 12/29/2013 | 01/04/2014 | 1 | Union# | 46 | 24.0 (L) |
| 19709 | A IS A PRODUCTIONS, INC. | 12/15/2013 | 12/21/2013 | 1 | Union# | 46 | 60.0 (L) |
| 19709 | A IS A PRODUCTIONS, INC. | 12/08/2013 | 12/14/2013 | 1 | Union# | 46 | 60.0 (L) |
| 19709 | A IS A PRODUCTIONS, INC. | 12/01/2013 | 12/07/2013 | 1 | Union# | 46 | 60.0 (L) |
| 12515 | BACKYARD PRODUCTIONS, L.L.C. | 08/04/2013 | 08/10/2013 | 1 | Union# | 33 | 12.0 |
| 12515 | BACKYARD PRODUCTIONS, L.L.C. | 07/07/2013 | 07/13/2013 | 1 | Union# | 33 | 24.0 |
| 15334 | BUNKER NEW YORK, L.L.C. | 04/30/2013 | 05/04/2013 | 1 | Union# | 33 | 60.0 |
| 12413 | UNTITLED, INC. | 04/16/2013 | 04/18/2013 | 0 | Union# | 33 | 24.0 (L) |
| 12515 | BACKYARD PRODUCTIONS, L.L.C. | 03/24/2013 | 03/30/2013 | 1 | Union# | 33 | 60.0 |
| 3895 | PARK PICTURES, L.L.C. | 03/10/2013 | 03/10/2013 | 0 | Union# | 33 | 12.0 |
| 3895 | PARK PICTURES, L.L.C. | 03/06/2013 | 03/09/2013 | 1 | Union# | 33 | 48.0 |
| 3895 | PARK PICTURES, L.L.C. | 01/29/2013 | 02/02/2013 | 1 | Union# | 33 | 144.0 (L) |
| 3895 | PARK PICTURES, L.L.C. | 01/02/2013 | 01/24/2013 | 3 | Union# | 33 | 48.0 (L) |
| 2276 | SONY PICTURES STUDIOS, INC. | 01/13/2013 | 01/19/2013 | 1 | Union# | 36 | 24.0 |
| 18129 | LUCKY 21, L.L.C. | 01/07/2013 | 01/07/2013 | 0 | Union# | 33 | 12.0 (L) |
| 3895 | PARK PICTURES, L.L.C. | 12/17/2012 | 12/19/2012 | 0 | Union# | 33 | 36.0 |
| 2276 | SONY PICTURES STUDIOS, INC. | 12/02/2012 | 12/08/2012 | 1 | Union# | 36 | 24.0 |
| 18067 | HUNGRY HEART MEDIA, INC. | 12/03/2012 | 12/06/2012 | 0 | Union# | 33 | 48.0 |
| 12413 | UNTITLED, INC. | 08/27/2012 | 08/27/2012 | 0 | Union# | 33 | 12.0 |
| 3895 | PARK PICTURES, L.L.C. | 08/05/2012 | 08/08/2012 | 0 | Union# | 33 | 48.0 |
| 3895 | PARK PICTURES, L.L.C. | 07/31/2012 | 08/03/2012 | 0 | Union# | 33 | 48.0 |
| 3895 | PARK PICTURES, L.L.C. | 07/26/2012 | 07/27/2012 | 0 | Union# | 33 | 24.0 |
| 14195 | LOGAN MEDIA, INC. | 07/19/2012 | 07/19/2012 | 0 | Union# | 33 | 12.0 (L) |
| 18699 | RB II PRODUCTIONS, L.L.C. | 07/01/2012 | 07/07/2012 | 1 | Union# | 36 | 60.0 |
| 18699 | RB II PRODUCTIONS, L.L.C. | 06/24/2012 | 06/30/2012 | 1 | Union# | 36 | 60.0 |
| 18699 | RB II PRODUCTIONS, L.L.C. | 06/17/2012 | 06/23/2012 | 1 | Union# | 36 | 60.0 |
| 18699 | RB II PRODUCTIONS, L.L.C. | 06/10/2012 | 06/16/2012 | 1 | Union# | 36 | 60.0 |
| 18699 | RB II PRODUCTIONS, L.L.C. | 06/03/2012 | 06/09/2012 | 1 | Union# | 36 | 60.0 |
| 18699 | RB II PRODUCTIONS, L.L.C. | 05/27/2012 | 06/02/2012 | 1 | Union# | 36 | 60.0 |
| 18699 | RB II PRODUCTIONS, L.L.C. | 05/20/2012 | 05/26/2012 | 1 | Union# | 36 | 60.0 |
| 18699 | RB II PRODUCTIONS, L.L.C. | 05/13/2012 | 05/19/2012 | 1 | Union# | 36 | 60.0 |
| 18699 | RB II PRODUCTIONS, L.L.C. | 05/06/2012 | 05/12/2012 | 1 | Union# | 36 | 60.0 |
| 18699 | RB II PRODUCTIONS, L.L.C. | 04/29/2012 | 05/05/2012 | 1 | Union# | 36 | 60.0 (L) |
| 2276 | SONY PICTURES STUDIOS, INC. | 04/15/2012 | 04/21/2012 | 1 | Union# | 36 | 12.0 |

| | | | | | | | |
|-------|--------------------------------------|------------|------------|---|--------|----|--------|
| 2276 | SONY PICTURES STUDIOS, INC. | 04/08/2012 | 04/14/2012 | 1 | Union# | 36 | 36.0 |
| 2276 | SONY PICTURES STUDIOS, INC. | 04/08/2012 | 04/14/2012 | 1 | Union# | 36 | 24.0 |
| 2276 | SONY PICTURES STUDIOS, INC. | 04/01/2012 | 04/07/2012 | 1 | Union# | 36 | 60.0 |
| 2276 | SONY PICTURES STUDIOS, INC. | 03/25/2012 | 03/31/2012 | 1 | Union# | 36 | 60.0 |
| 2276 | SONY PICTURES STUDIOS, INC. | 03/18/2012 | 03/24/2012 | 1 | Union# | 36 | 60.0 |
| 2276 | SONY PICTURES STUDIOS, INC. | 03/11/2012 | 03/17/2012 | 1 | Union# | 36 | 60.0 |
| 2276 | SONY PICTURES STUDIOS, INC. | 03/04/2012 | 03/10/2012 | 1 | Union# | 36 | 60.0 |
| 2276 | SONY PICTURES STUDIOS, INC. | 02/26/2012 | 03/03/2012 | 1 | Union# | 36 | 60.0 |
| 2276 | SONY PICTURES STUDIOS, INC. | 02/19/2012 | 02/25/2012 | 1 | Union# | 36 | 60.0 |
| 2276 | SONY PICTURES STUDIOS, INC. | 02/12/2012 | 02/18/2012 | 1 | Union# | 36 | 48.0 |
| 3002 | BROWNSTONE PRODUCTIONS, INC. | 02/14/2012 | 02/15/2012 | 0 | Union# | 33 | 24.0 |
| 3002 | BROWNSTONE PRODUCTIONS, INC. | 02/08/2012 | 02/11/2012 | 1 | Union# | 33 | 48.0 |
| 3002 | BROWNSTONE PRODUCTIONS, INC. | 02/01/2012 | 02/04/2012 | 1 | Union# | 33 | 48.0 |
| 3002 | BROWNSTONE PRODUCTIONS, INC. | 01/31/2012 | 01/31/2012 | 0 | Union# | 33 | 12.0 |
| 13187 | CORPORATE MANAGEMENT SOLUTIONS, INC. | 01/09/2012 | 01/09/2012 | 0 | Union# | 33 | 12.0 |
| | Total for specified period: | | | | | | 4786.0 |

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE BY MAIL
(State and Federal)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18, and not a party to the within entitled action; my business address is c/o Baker, Olson, LeCroy & Danielian 100 W. Broadway #600, Glendale, CA 91210.

On October 3, 2018, I served the foregoing "Discovery Responses" on the interested parties in this action

XX MAIL placing a true copy thereof enclosed in a sealed envelope with first class postage thereon fully prepaid in the United States mail at Glendale, California, severally addressed as follows:

___ PERSONAL DELIVERY by causing a true copy thereof in a sealed envelope to be personally delivered, severally addressed as follows:

___ FAX by transmitting a true copy in accordance with CCP § 1005 and 1013 by facsimile severally to the fax numbers shown below; our fax machine provided a report indicating that such transmission was received.

___ OVERNIGHT DELIVERY by Express Mail or other method of delivery providing for overnight delivery in accordance with CCP § 1005 and 1013 by placing a true copy thereof in a sealed envelope with delivery charges prepaid or provided for in a box maintained for that purpose at Glendale, California, severally addressed as follows:

__ EMAIL as shown

Camille M. Vasquez
Randall A. Smith
Brown Rudnik LLP
2211 Michelson Drive, 7th Floor
Irvine, Ca 92612

I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct and that this is executed on October 3, 2018, at Glendale, California.


ARBELLA AZIZIAN

BAKER, OLSON, LECROY & DANIELIAN
100 West Broadway, Suite 600
Glendale, CA 91210

Exhibit 3

1 Arbella Azizian # 294696
2 BAKER, OLSON, LeCROY & DANIELIAN
3 100 W. BROADWAY # 990
4 GLENDALE, CA 91210
5 T: 818 502 5600
6 F. 818 241 2653
7 azizian@boldlaw.com

8 Attorneys for Plaintiff
9 Gregg "Rocky" Brooks

10 **SUPERIOR COURT OF CALIFORNIA; COUNTY OF LOS ANGELES**

11 GREGG "ROCKY" BROOKS

12 Plaintiff,

13 v.

14 JOHN C. DEPP, an individual; MIRIAM
15 SEGAL, an individual; BRAD FURMAN,
16 an individual; INFINITUM NIHIL, A
17 Californian Corporation; And DOES 1-50

Case No.: BC713123

SUPPLEMENTAL RESPONSES TO
GENERAL FORM INTERROGATORIES
- SET ONE

18 PROPOUNDING PARTY: John C. Depp

19 RESPONDING PARTY: Gregg "Rocky" Brooks

20 SET: ONE

21 ANSWERING PARTY responds as follows to, PROPOUNDING PARTY'S GENERAL
22 FORM INTERROGATORIES SET ONE:

23 These responses are made solely for the purpose of and in relation to, this
24 action. Each response is given subject to all appropriate objections (including, but not
25 limited to, objections concerning competency, relevancy, materiality, propriety and
26 inadmissibility) which would require the exclusion of any statement contained herein, or
27 any document referred to herein, if these requests were asked of, or any statements
28

1 contained herein were made by, a witness present and testifying in court. All such
2 objections and ground are therefore reserved and may be interposed at the time of trial.

3 The party or parties on whose behalf these responses are given has not yet
4 completed his, her or its investigation of the facts relating to this action, and has not yet
5 completed preparation for trial.

6
7 The following responses are based upon information presently available to the
8 responding parties and are made without prejudice to the responding parties' right to
9 utilize and produce at the time of trial subsequently discovered evidence relating to the
10 proof of any material facts, and to produce all evidence, whenever discovered, relating
11 to the proof of facts subsequently discovered to be material.

12 Except for facts explicitly admitted herein, no incidental or implied admissions of
13 any nature whatsoever are intended hereby. The fact that any demand for production
14 herein has been answered should not be taken as an admission, acceptance or
15 concession of the existence of any facts set forth or assumed by such request, or that
16 such response constitutes admissible evidence or evidence of any fact thus set forth or
17 assumed, all request for production which assume facts are objected to on that basis,
18 and any response provided thereto is provided without waiving such objection. The fact
19 that the party on whose behalf these responses are given has answered part or all of
20 any demand for production is not intended and should not be construed as a waiver by
21 the responding party of all or any part of any objection to any interrogatory.
22
23

24
25 FORM INTERROGATORIES

- 26
27
28 **2.3** a) California
b) N7195090, Class C

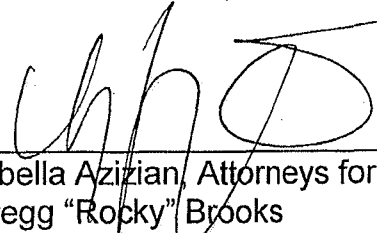
- 1 c) 01/07/2015
2 d) no restrictions
- 3 **2.4** No.
- 4 **2.7** a) University High School 1977-1979 11800 Texas Ave, Los Angeles, CA
5 90025
6 b) Santa Barbara City College 1980 721 Cliff Dr, Santa Barbara, CA 93109
- 7 **6.4 Supplemented Response:** No, however, due to the worsening of his
8 condition, Plaintiff is seeking treatment. The name of the therapist is Terre
9 Bridgham, 914 S Robertson Blvd
10 Suite 104, Los Angeles, California 90035, (213) 863-1274
- 11 **8.6 Supplemented Response** Plaintiff worked consistently prior to the
12 incident and was generally offered work whenever Plaintiff was available for
13 work. Since being listed as available for work in July, Plaintiff was denied work
14 on two occasions. Plaintiff was sent to return to work early, in June 27, 2018 for a
15 project but the job offer was pulled back. Then again on August 29, 2018, he
16 was submitted for work, but the offer was again rescinded. Each job was
17 expected to run for several months and both were lost because of this incident
18 and the ensuing lawsuit. Plaintiff did not find work until October 1, 2018
- 19 **11.1** a) 2011 car accident off 110 freeway near South Adams exist
20 b) Plaintiff was struck by a drunk driver but does not recall the name of the
21 driver.
22 c) Plaintiff believes an action was filed in Los Angeles Superior Court but
23 does not recall the case number.
24 d) David Rosenberg 7120 Hayvenhurst Ave. Suite 321, Van Nuys CA
25 91406.
26 e) The matter was resolved.
27 f) neck and back injuries.
- 28 //
- //
- //
- //
- //
- //

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

- a) 2017 car accident middle of the day, near the 9th street exit near 110 freeway South.
- b) Plaintiff does not recall the name of the driver.
- c) Plaintiff believes an action was filed in Los Angeles Superior Court but does not recall the case number.
- d) Tofer and Associates, 8889 W Olympic Blvd, Beverly Hills, CA 90211
- e) The matter was resolved
- f) neck and back injuries

DATED: 11/29/18

Baker, Olson, LeCroy & Danielian

by 
Arbella Azizian, Attorneys for
Gregg "Rocky" Brooks

BAKER OLSON LE CROY & DANIELIAN
101 West Broadway, Suite 600
Glendale, CA 91219

1
2
3 VERIFICATION
4

5 X I am the Plaintiff herein.

6 I have read the foregoing Supplemental Response to General Form
7 Interrogatories - Set One and know its contents. The matters stated therein are
8 true of my own knowledge except as to those matters which are stated on
information and belief, and as to those matters I believe them to be true.

9 Executed on NOV 29th, 2018, at Los Angeles
10 CALIFORNIA.

11 I declare under penalty of perjury under the laws of the State of California that the
12 foregoing is true and correct.

13 
14 _____
Gregg "Rocky" Brooks
15
16
17
18
19
20
21
22
23
24
25
26
27

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE BY MAIL
(State and Federal)

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

I am employed in the County of Los Angeles, State of California. I am over the age of 18, and not a party to the within entitled action; my business address is c/o Baker, Olson, LeCroy & Danielian 100 W. Broadway #600, Glendale, CA 91210.

On November 29, 2018, I served the foregoing "**Supplemental Discovery Responses**" on the interested parties in this action

XX MAIL placing a true copy thereof enclosed in a sealed envelope with first class postage thereon fully prepaid in the United States mail at Glendale, California, severally addressed as follows:

 PERSONAL DELIVERY by causing a true copy thereof in a sealed envelope to be personally delivered, severally addressed as follows:

 FAX by transmitting a true copy in accordance with CCP § 1005 and 1013 by facsimile severally to the fax numbers shown below; our fax machine provided a report indicating that such transmission was received.

 OVERNIGHT DELIVERY by Express Mail or other method of delivery providing for overnight delivery in accordance with CCP § 1005 and 1013 by placing a true copy thereof in a sealed envelope with delivery charges prepaid or provided for in a box maintained for that purpose at Glendale, California, severally addressed as follows:

 EMAIL as shown

Camille M. Vasquez
Randall A. Smith
Brown Rudnik LLP
2211 Michelson Drive, 7th Floor
Irvine, Ca 92612

I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the State of California and the United States that the foregoing is true and correct and that this is executed on November 29, 2018, at Glendale, California.


ARBELLA AZIZIAN

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

PROOF OF SERVICE

STATE OF CALIFORNIA,

COUNTY OF ORANGE

At the time of service, I was over 18 years of age and **not a party to this action**. I am employed in the County of Orange, State of California. My business address is 2211 Michelson Drive, Seventh Floor, Irvine, CA 92612.

On August 26, 2019, I served true copies of the following document(s) described as **REPLY TO OPPOSITION TO MOTION TO RECLASSIFY AS LIMITED CIVIL CASE** on the interested parties in this action as follows:

Arbella Azizian, Esq.
Baker, Olson, LeCroy & Danielian
100 West Broadway Blvd., Suite 990
Glendale, CA 91210
Telephone: (818) 502-5600
Facsimile: (818) 241-2653
Email: azizian@boldlaw.com

Attorneys for Plaintiff
GREGG "ROCKY" BROOKS

BY OVERNIGHT DELIVERY: I enclosed said document(s) in an envelope or package provided by the overnight service carrier and addressed to the persons at the addresses listed in the Service List. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight service carrier or delivered such document(s) to a courier or driver authorized by the overnight service carrier to receive documents.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on August 26, 2019, at Irvine, California.



CASEY SUDA