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07/28/2014

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Attorneys for Plaintiff WADE ROBSON

**SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES, CENTRAL DISTRICT**

WADE ROBSON, an individual,

Plaintiff,

vs.

DOE 1, an individual; MJJ PRODUCTIONS,
INC., a California corporation; MJJ
VENTURES, INC., a California corporation;
and DOES 4-50, inclusive,

Defendants.

Case No.: BC508502

[Related to probate case, BP117321]

[Both cases assigned to the Honorable Judge
Mitchell L. Beckloff, Dept. 51]

**PLAINTIFF WADE ROBSON'S FIRST SET
OF SPECIAL INTERROGATORIES TO
DEFENDANT MJJ PRODUCTIONS, INC.**

PROPOUNDING PARTY:

PLAINTIFF WADE ROBSON

RESPONDING PARTY:

DEFENDANT MJJ PRODUCTIONS, INC.

SET NO.:

One (1)

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1 Pursuant to California Code of Civil Procedure § 2030.010, *et seq.*, Plaintiff WADE
2 ROBSON ("Wade Robson") hereby requests that Defendant MJJ PRODUCTIONS, INC.
3 ("Responding Party") answer each of the following Special Interrogatories (Set No. One) in
4 writing under oath within thirty (30) days from the date of service hereof.

5 **DEFINITIONS**

6 Words in CAPITALS in these Special Interrogatories are defined as follows:

- 7 1. As used herein, the term "CORPORATION" means MJJ Productions, Inc. and
8 any and all persons who formerly acted or purported to act and/or currently act or purport to act
9 on behalf of it or any of them.
- 10 2. As used herein, the term "DECEDENT" means Michael Joseph Jackson, who is
11 also named as DOE 1 as defined in paragraph 2 of the Second Amended Complaint filed on
12 February 19, 2014.
- 13 3. As used herein, the terms "and" and "or" are to be construed both conjunctively
14 and disjunctively as necessary to make these Requests inclusive rather than exclusive. The
15 singular form of a noun or pronoun includes the plural form and vice versa.

16 **SPECIAL INTERROGATORIES**

17 **SPECIAL INTERROGATORY NO. 1:**

18 Please identify all business entities in which DECEDENT had an ownership interest during
19 the time period from approximately 1990 through 1997.

20 **SPECIAL INTERROGATORY NO. 2:**

21 Please identify all business entities over which DECEDENT exercised control during the
22 time period from approximately 1990 through 1997.

23 **SPECIAL INTERROGATORY NO. 3:**

24 Please identify all business entities in which DECEDENT had an ownership interest that
25 employed Norma Staikos during the time period from approximately 1990 through 1997.
26
27
28

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2 **SPECIAL INTERROGATORY NO. 4:**

3 Please identify all business entities over which DECEDENT exercised control that
4 employed Norma Staikos during the time period from approximately 1990 through 1997.

5 **SPECIAL INTERROGATORY NO. 5:**

6 Please identify all business entities in which DECEDENT had an ownership interest that
7 obtained an H1-B visa for Joy Robson in or around September 1991.

8 **SPECIAL INTERROGATORY NO. 6:**

9 Please identify all business entities over which DECEDENT exercised control that
10 obtained an H1-B visa for Joy Robson in or around September 1991.

11 **SPECIAL INTERROGATORY NO. 7:**

12 Please identify all business entities in which DECEDENT had an ownership interest that
13 obtained an H1-B visa for Wade Robson in or around September 1991.

14 **SPECIAL INTERROGATORY NO. 8:**

15 Please identify all business entities over which DECEDENT exercised control that
16 obtained an H1-B visa for Wade Robson in or around September 1991.

17 **SPECIAL INTERROGATORY NO. 9:**

18 Please identify all business entities in which DECEDENT had an ownership interest that
19 employed Joy Robson during the time period from approximately 1990 through 1997.

20 **SPECIAL INTERROGATORY NO. 10:**

21 Please identify all business entities over which DECEDENT exercised control that
22 employed Joy Robson during the time period from approximately 1990 through 1997.

23 **SPECIAL INTERROGATORY NO. 11:**

24 Please identify all business entities in which DECEDENT had an ownership interest that
25 employed Wade Robson during the time period from approximately 1990 through 1997.

26 **SPECIAL INTERROGATORY NO. 12:**

27 Please identify all business entities over which DECEDENT exercised control that
28 employed Wade Robson during the time period from approximately 1990 through 1997.

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SPECIAL INTERROGATORY NO. 13:

Please identify all business entities in which DECEDENT had an ownership interest that supervised Wade Robson during the time period from approximately 1990 through 1997.

SPECIAL INTERROGATORY NO. 14:

Please identify all business entities over which DECEDENT exercised control that supervised Wade Robson during the time period from approximately 1990 through 1997.

SPECIAL INTERROGATORY NO. 15:

Please identify all business entities in which DECEDENT had an ownership interest that paid for Wade Robson to undertake any training, coursework, or other form of education during the time period from approximately 1990 through 1997.

SPECIAL INTERROGATORY NO. 16:

Please identify all business entities over which DECEDENT exercised control that paid for Wade Robson to undertake any training, coursework, or other form of education during the time period from approximately 1990 through 1997.

SPECIAL INTERROGATORY NO. 17:

Please identify all business entities in which DECEDENT had an ownership interest that paid for Wade Robson to undertake any travel during the time period from approximately 1990 through 1997.

SPECIAL INTERROGATORY NO. 18:

Please identify all business entities over which DECEDENT exercised control that paid for Wade Robson to undertake any travel during the time period from approximately 1990 through 1997.

SPECIAL INTERROGATORY NO. 19:

Please identify all business entities in which DECEDENT had an ownership interest that paid for Joy Robson to undertake any travel during the time period from approximately 1990 through 1997.

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SPECIAL INTERROGATORY NO. 20:

Please identify all business entities over which DECEDENT exercised control that paid for Joy Robson to undertake any travel during the time period from approximately 1990 through 1997.

SPECIAL INTERROGATORY NO. 21:

Please identify all business entities in which DECEDENT had an ownership interest that paid for Chantal Robson to undertake any travel during the time period from approximately 1990 through 1997.

SPECIAL INTERROGATORY NO. 22:

Please identify all business entities over which DECEDENT exercised control that paid for Chantal Robson to undertake any travel during the time period from approximately 1990 through 1997.

SPECIAL INTERROGATORY NO. 23:

Please identify all boys under the age of 18 with whom DECEDENT engaged in sexual activities after DECEDENT reached the age of 21.

SPECIAL INTERROGATORY NO. 24:

Please identify all persons who have asserted claims against DECEDENT for childhood sexual abuse as defined in California Code of Civil Procedure § 340.1.

SPECIAL INTERROGATORY NO. 25:

Please identify all persons who have filed lawsuits against DECEDENT for childhood sexual abuse as defined in California Code of Civil Procedure § 340.1.

SPECIAL INTERROGATORY NO. 26:

Please identify all persons with whom DECEDENT entered into agreements to settle claims for childhood sexual abuse as defined in California Code of Civil Procedure § 340.1.

SPECIAL INTERROGATORY NO. 27:

Please identify all persons to whom DECEDENT paid consideration to settle claims for childhood sexual abuse as defined in California Code of Civil Procedure § 340.1.

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SPECIAL INTERROGATORY NO. 28:

Please identify all persons who have asserted claims against the CORPORATION for acts of childhood sexual abuse committed by DECEDENT as defined in California Code of Civil Procedure § 340.1.

SPECIAL INTERROGATORY NO. 29:

Please identify all persons who have asserted claims against MJJ Ventures, Inc. for acts of childhood sexual abuse committed by DECEDENT as defined in California Code of Civil Procedure § 340.1.

SPECIAL INTERROGATORY NO. 30:

Please identify all persons who have filed lawsuits against the CORPORATION for acts of childhood sexual abuse committed by DECEDENT as defined in California Code of Civil Procedure § 340.1.

SPECIAL INTERROGATORY NO. 31:

Please identify all persons who have filed lawsuits against MJJ Ventures, Inc. for acts of childhood sexual abuse committed by DECEDENT as defined in California Code of Civil Procedure § 340.1.

SPECIAL INTERROGATORY NO. 32:

Please identify all persons with whom the CORPORATION entered into agreements to settle claims for acts of childhood sexual abuse committed by DECEDENT as defined in California Code of Civil Procedure § 340.1.

SPECIAL INTERROGATORY NO. 33:

Please identify all persons with whom MJJ Ventures, Inc. entered into agreements to settle claims for acts of childhood sexual abuse committed by DECEDENT as defined in California Code of Civil Procedure § 340.1.

SPECIAL INTERROGATORY NO. 34:

Please identify all persons to whom the CORPORATION paid consideration to settle claims for acts of childhood sexual abuse committed by DECEDENT as defined in California Code of Civil Procedure § 340.1.

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1 **SPECIAL INTERROGATORY NO. 35:**

2 Please identify all persons to whom MJJ Ventures, Inc. paid consideration to settle claims
3 for acts of childhood sexual abuse committed by DECEDENT as defined in California Code of
4 Civil Procedure § 340.1.

5 **SPECIAL INTERROGATORY NO. 36:**

6 Please identify all persons who have asserted claims against DECEDENT for sexual
7 molestation.

8 **SPECIAL INTERROGATORY NO. 37:**

9 Please identify all persons who have filed lawsuits against DECEDENT for sexual
10 molestation.

11 **SPECIAL INTERROGATORY NO. 38:**

12 Please identify all persons with whom DECEDENT entered into agreements to settle
13 claims for sexual molestation.

14 **SPECIAL INTERROGATORY NO. 39:**

15 Please identify all persons to whom DECEDENT paid consideration to settle claims for
16 sexual molestation.

17 **SPECIAL INTERROGATORY NO. 40:**

18 Please identify all persons who have asserted claims against the CORPORATION for
19 sexual molestation by DECEDENT.

20 **SPECIAL INTERROGATORY NO. 41:**

21 Please identify all persons who have asserted claims against MJJ Ventures, Inc. for sexual
22 molestation by DECEDENT.

23 **SPECIAL INTERROGATORY NO. 42:**

24 Please identify all persons who have filed lawsuits against the CORPORATION for sexual
25 molestation by DECEDENT.

26 **SPECIAL INTERROGATORY NO. 43:**

27 Please identify all persons who have filed lawsuits against MJJ Ventures Inc. for sexual
28 molestation by DECEDENT.

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SPECIAL INTERROGATORY NO. 44:

Please identify all persons with whom the CORPORATION entered into agreements to settle claims for sexual molestation by DECEDENT.

SPECIAL INTERROGATORY NO. 45:

Please identify all persons with whom MJJ Ventures, Inc. entered into agreements to settle claims for sexual molestation by DECEDENT.

SPECIAL INTERROGATORY NO. 46:

Please identify all persons to whom the CORPORATION paid consideration to settle claims for sexual molestation by DECEDENT.

SPECIAL INTERROGATORY NO. 47:

Please identify all persons to whom MJJ Ventures, Inc. paid consideration to settle claims for sexual molestation by DECEDENT.

SPECIAL INTERROGATORY NO. 48:

Please identify all persons who have asserted claims against DECEDENT for sexual battery.

SPECIAL INTERROGATORY NO. 49:

Please identify all persons who have filed lawsuits against DECEDENT for sexual battery.

SPECIAL INTERROGATORY NO. 50:

Please identify all persons with whom DECEDENT entered into agreements to settle claims for sexual battery.

SPECIAL INTERROGATORY NO. 51:

Please identify all persons to whom DECEDENT paid consideration to settle claims for sexual battery.

SPECIAL INTERROGATORY NO. 52:

Please identify all persons who have asserted claims against the CORPORATION for sexual battery by DECEDENT.

SPECIAL INTERROGATORY NO. 53:

Please identify all persons who have asserted claims against MJJ Ventures, Inc. for sexual battery by DECEDENT.

SPECIAL INTERROGATORY NO. 54:

Please identify all persons who have filed lawsuits against the CORPORATION for sexual battery by DECEDENT.

SPECIAL INTERROGATORY NO. 55:

Please identify all persons who have filed lawsuits against the MJJ Ventures, Inc. for sexual battery by DECEDENT.

SPECIAL INTERROGATORY NO. 56:

Please identify all persons with whom the CORPORATION entered into agreements to settle claims for sexual battery by DECEDENT.

SPECIAL INTERROGATORY NO. 57:

Please identify all persons with whom MJJ Ventures, Inc. entered into agreements to settle claims for sexual battery by DECEDENT.

SPECIAL INTERROGATORY NO. 58:

Please identify all persons to whom the CORPORATION paid consideration to settle claims for sexual battery by DECEDENT.

SPECIAL INTERROGATORY NO. 59:

Please identify all persons to whom MJJ Ventures, Inc. paid consideration to settle claims for sexual battery by DECEDENT.

SPECIAL INTERROGATORY NO. 60:

Please identify all persons who have asserted claims against DECEDENT for battery.

SPECIAL INTERROGATORY NO. 61:

Please identify all persons who have filed lawsuits against DECEDENT for battery.

SPECIAL INTERROGATORY NO. 62:

Please identify all persons with whom DECEDENT entered into agreements to settle claims for battery.

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SPECIAL INTERROGATORY NO. 63:

Please identify all persons to whom DECEDENT paid consideration to settle claims for battery.

SPECIAL INTERROGATORY NO. 64:

Please identify all persons who have asserted claims against the CORPORATION for battery by DECEDENT.

SPECIAL INTERROGATORY NO. 65:

Please identify all persons who have asserted claims against MJJ Ventures, Inc. for battery by DECEDENT.

SPECIAL INTERROGATORY NO. 66:

Please identify all persons who have filed lawsuits against the CORPORATION for battery by DECEDENT.

SPECIAL INTERROGATORY NO. 67:

Please identify all persons who have filed lawsuits against MJJ Ventures, Inc. for battery by DECEDENT.

SPECIAL INTERROGATORY NO. 68:

Please identify all persons with whom the CORPORATION entered into agreements to settle claims for battery by DECEDENT.

SPECIAL INTERROGATORY NO. 69:

Please identify all persons with whom MJJ Ventures, Inc. entered into agreements to settle claims for battery by DECEDENT.

SPECIAL INTERROGATORY NO. 70:

Please identify all persons to whom the CORPORATION paid consideration to settle claims for battery by DECEDENT.

SPECIAL INTERROGATORY NO. 71:

Please identify all persons to whom MJJ Ventures, Inc. paid consideration to settle claims for battery by DECEDENT.

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1 **SPECIAL INTERROGATORY NO. 72:**

2 Please identify all persons who have asserted claims against DECEDENT for seduction.

3 **SPECIAL INTERROGATORY NO. 73:**

4 Please identify all persons who have filed lawsuits against DECEDENT for seduction.

5 **SPECIAL INTERROGATORY NO. 74:**

6 Please identify all persons with whom DECEDENT entered into agreements to settle
7 claims for seduction.

8 **SPECIAL INTERROGATORY NO. 75:**

9 Please identify all persons to whom DECEDENT paid consideration to settle claims for
10 seduction.

11 **SPECIAL INTERROGATORY NO. 76:**

12 Please identify all persons who have asserted claims against the CORPORATION for
13 seduction by DECEDENT.

14 **SPECIAL INTERROGATORY NO. 77:**

15 Please identify all persons who have asserted claims against MJJ Ventures, Inc. for
16 seduction by DECEDENT.

17 **SPECIAL INTERROGATORY NO. 78:**

18 Please identify all persons who have filed lawsuits against the CORPORATION for
19 seduction by DECEDENT.

20 **SPECIAL INTERROGATORY NO. 79:**

21 Please identify all persons who have filed lawsuits against MJJ Ventures, Inc. for seduction
22 by DECEDENT.

23 **SPECIAL INTERROGATORY NO. 80:**

24 Please identify all persons with whom the CORPORATION entered into agreements to
25 settle claims for seduction by DECEDENT.

26 **SPECIAL INTERROGATORY NO. 81:**

27 Please identify all persons with whom MJJ Ventures, Inc. entered into agreements to settle
28 claims for seduction by DECEDENT.

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1 **SPECIAL INTERROGATORY NO. 82:**

2 Please identify all persons to whom the CORPORATION paid consideration to settle
3 claims for seduction by DECEDENT.

4 **SPECIAL INTERROGATORY NO. 83:**

5 Please identify all persons to whom MJJ Ventures, Inc. paid consideration to settle claims
6 for seduction by DECEDENT.

7 **SPECIAL INTERROGATORY NO. 84:**

8 Please identify all persons who have asserted claims against DECEDENT for willful
9 misconduct.

10 **SPECIAL INTERROGATORY NO. 85:**

11 Please identify all persons who have filed lawsuits against DECEDENT for willful
12 misconduct.

13 **SPECIAL INTERROGATORY NO. 86:**

14 Please identify all persons with whom DECEDENT entered into agreements to settle
15 claims for willful misconduct.

16 **SPECIAL INTERROGATORY NO. 87:**

17 Please identify all persons to whom DECEDENT paid consideration to settle claims for
18 willful misconduct.

19 **SPECIAL INTERROGATORY NO. 88:**

20 Please identify all persons who have asserted claims against the CORPORATION for
21 willful misconduct by DECEDENT.

22 **SPECIAL INTERROGATORY NO. 89:**

23 Please identify all persons who have asserted claims against MJJ Ventures, Inc. for willful
24 misconduct by DECEDENT.

25 **SPECIAL INTERROGATORY NO. 90:**

26 Please identify all persons who have filed lawsuits against the CORPORATION for willful
27 misconduct by DECEDENT.

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SPECIAL INTERROGATORY NO. 91:

Please identify all persons who have filed lawsuits against MJJ Ventures, Inc. for willful misconduct by DECEDENT.

SPECIAL INTERROGATORY NO. 92:

Please identify all persons with whom the CORPORATION entered into agreements to settle claims for willful misconduct by DECEDENT.

SPECIAL INTERROGATORY NO. 93:

Please identify all persons with whom MJJ Ventures, Inc. entered into agreements to settle claims for willful misconduct by DECEDENT.

SPECIAL INTERROGATORY NO. 94:

Please identify all persons to whom the CORPORATION paid consideration to settle claims for willful misconduct by DECEDENT.

SPECIAL INTERROGATORY NO. 95:

Please identify all persons to whom MJJ Ventures, Inc. paid consideration to settle claims for willful misconduct by DECEDENT.

SPECIAL INTERROGATORY NO. 96:

Please identify all persons who have asserted claims against DECEDENT for intentional infliction of emotional distress.

SPECIAL INTERROGATORY NO. 97:

Please identify all persons who have filed lawsuits against DECEDENT for intentional infliction of emotional distress.

SPECIAL INTERROGATORY NO. 98:

Please identify all persons with whom DECEDENT entered into agreements to settle claims for intentional infliction of emotional distress.

SPECIAL INTERROGATORY NO. 99:

Please identify all persons to whom DECEDENT paid consideration to settle claims for intentional infliction of emotional distress.

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SPECIAL INTERROGATORY NO. 100:

Please identify all persons who have asserted claims against the CORPORATION for intentional infliction of emotional distress by DECEDENT.

SPECIAL INTERROGATORY NO. 101:

Please identify all persons who have asserted claims against MJJ Ventures, Inc. for intentional infliction of emotional distress by DECEDENT.

SPECIAL INTERROGATORY NO. 102:

Please identify all persons who have filed lawsuits against the CORPORATION for intentional infliction of emotional distress by DECEDENT.

SPECIAL INTERROGATORY NO. 103:

Please identify all persons who have filed lawsuits against MJJ Ventures, Inc. for intentional infliction of emotional distress by DECEDENT.

SPECIAL INTERROGATORY NO. 104:

Please identify all persons with whom the CORPORATION entered into agreements to settle claims for intentional infliction of emotional distress by DECEDENT.

SPECIAL INTERROGATORY NO. 105:

Please identify all persons with whom MJJ Ventures, Inc. entered into agreements to settle claims for intentional infliction of emotional distress by DECEDENT.

SPECIAL INTERROGATORY NO. 106:

Please identify all persons to whom the CORPORATION paid consideration to settle claims for intentional infliction of emotional distress by DECEDENT.

SPECIAL INTERROGATORY NO. 107:

Please identify all persons to whom MJJ Ventures, Inc. paid consideration to settle claims for intentional infliction of emotional distress by DECEDENT.

SPECIAL INTERROGATORY NO. 108:

Please identify all persons who have asserted claims against DECEDENT for fraud.

SPECIAL INTERROGATORY NO. 109:

Please identify all persons who have filed lawsuits against DECEDENT for fraud.

1 **SPECIAL INTERROGATORY NO. 110:**

2 Please identify all persons with whom DECEDENT entered into agreements to settle
3 claims for fraud.

4 **SPECIAL INTERROGATORY NO. 111:**

5 Please identify all persons to whom DECEDENT paid consideration to settle claims for
6 fraud.

7 **SPECIAL INTERROGATORY NO. 112:**

8 Please identify all persons who have asserted claims against the CORPORATION for
9 fraud by DECEDENT.

10 **SPECIAL INTERROGATORY NO. 113:**

11 Please identify all persons who have asserted claims against MJJ Ventures, Inc. for fraud
12 by DECEDENT.

13 **SPECIAL INTERROGATORY NO. 114:**

14 Please identify all persons who have filed lawsuits against the CORPORATION for fraud
15 by DECEDENT.

16 **SPECIAL INTERROGATORY NO. 115:**

17 Please identify all persons who have filed lawsuits against MJJ Ventures, Inc. for fraud by
18 DECEDENT.

19 **SPECIAL INTERROGATORY NO. 116:**

20 Please identify all persons with whom the CORPORATION entered into agreements to
21 settle claims for fraud by DECEDENT.

22 **SPECIAL INTERROGATORY NO. 117:**

23 Please identify all persons with whom MJJ Ventures, Inc. entered into agreements to settle
24 claims for fraud by DECEDENT.

25 **SPECIAL INTERROGATORY NO. 118:**

26 Please identify all persons to whom the CORPORATION paid consideration to settle
27 claims for fraud by DECEDENT.

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SPECIAL INTERROGATORY NO. 119:

Please identify all persons to whom MJJ Ventures, Inc. paid consideration to settle claims for fraud by DECEDENT

SPECIAL INTERROGATORY NO. 120:

Please identify all persons who have asserted claims against DECEDENT for negligence.

SPECIAL INTERROGATORY NO. 121:

Please identify all persons who have filed lawsuits against DECEDENT for negligence.

SPECIAL INTERROGATORY NO. 122:

Please identify all persons with whom DECEDENT entered into agreements to settle claims for negligence.

SPECIAL INTERROGATORY NO. 123:

Please identify all persons to whom DECEDENT paid consideration to settle claims for negligence.

SPECIAL INTERROGATORY NO. 124:

Please identify all persons who have asserted claims against the CORPORATION for negligence by DECEDENT.

SPECIAL INTERROGATORY NO. 125:

Please identify all persons who have asserted claims against MJJ Ventures, Inc. for negligence by DECEDENT.

SPECIAL INTERROGATORY NO. 126:

Please identify all persons who have filed lawsuits against the CORPORATION for negligence by DECEDENT.

SPECIAL INTERROGATORY NO. 127:

Please identify all persons who have filed lawsuits against MJJ Ventures, Inc. for negligence by DECEDENT.

SPECIAL INTERROGATORY NO. 128:

Please identify all persons with whom the CORPORATION entered into agreements to settle claims for negligence by DECEDENT.

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SPECIAL INTERROGATORY NO. 129:

Please identify all persons with whom MJJ Ventures, Inc. entered into agreements to settle claims for negligence by DECEDENT.

SPECIAL INTERROGATORY NO. 130:

Please identify all persons to whom the CORPORATION paid consideration to settle claims for negligence by DECEDENT.

SPECIAL INTERROGATORY NO. 131:

Please identify all persons to whom MJJ Ventures, Inc. paid consideration to settle claims for negligence by DECEDENT.

SPECIAL INTERROGATORY NO. 132:

Please identify all persons who have asserted claims against DECEDENT for negligent infliction of emotional distress.

SPECIAL INTERROGATORY NO. 133:

Please identify all persons who have filed lawsuits against DECEDENT for negligent infliction of emotional distress.

SPECIAL INTERROGATORY NO. 134:

Please identify all persons with whom DECEDENT entered into agreements to settle claims for negligent infliction of emotional distress.

SPECIAL INTERROGATORY NO. 135:

Please identify all persons to whom DECEDENT paid consideration to settle claims for negligent infliction of emotional distress.

SPECIAL INTERROGATORY NO. 136:

Please identify all persons who have asserted claims against the CORPORATION for negligent infliction of emotional distress by DECEDENT.

SPECIAL INTERROGATORY NO. 137:

Please identify all persons who have asserted claims against MJJ Ventures, Inc. for negligent infliction of emotional distress by DECEDENT.

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1 **SPECIAL INTERROGATORY NO. 138:**

2 Please identify all persons who have filed lawsuits against the CORPORATION for
3 negligent infliction of emotional distress by DECEDENT.

4 **SPECIAL INTERROGATORY NO. 139:**

5 Please identify all persons who have filed lawsuits against MJJ Ventures, Inc. for negligent
6 infliction of emotional distress by DECEDENT.

7 **SPECIAL INTERROGATORY NO. 140:**

8 Please identify all persons with whom the CORPORATION entered into agreements to
9 settle claims for negligent infliction of emotional distress by DECEDENT.

10 **SPECIAL INTERROGATORY NO. 141:**

11 Please identify all persons with whom MJJ Ventures, Inc. entered into agreements to settle
12 claims for negligent infliction of emotional distress by DECEDENT.

13 **SPECIAL INTERROGATORY NO. 142:**

14 Please identify all persons to whom the CORPORATION paid consideration to settle
15 claims for negligent infliction of emotional distress by DECEDENT.

16 **SPECIAL INTERROGATORY NO. 143:**

17 Please identify all persons to whom MJJ Ventures, Inc. paid consideration to settle claims
18 for negligent infliction of emotional distress by DECEDENT.

19
20 DATED: May 21, 2014

GRADSTEIN & MARZANO, P.C.
HENRY GRADSTEIN
MARYANN R. MARZANO
MATTHEW A. SLATER

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22
23
24 By: _____

Maryann R. Marzano
Attorneys for Plaintiff WADE ROBSON

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DECLARATION FOR ADDITIONAL DISCOVERY

I, Maryann R. Marzano, declare:

1. I am partner at Gradstein & Marzano, P.C., counsel of record for Plaintiff Wade Robson ("Plaintiff"). The facts set forth below are based upon my personal knowledge and, if called upon to testify as to the facts stated herein, I could and would competently so testify.

2. I am propounding to Respondent MJJ Productions, Inc. ("Respondent") the attached Special Interrogatories, Set One.

3. This set of interrogatories will cause the total number of specially prepared interrogatories propounded to the party to whom they are directed to exceed the number of specially prepared interrogatories permitted by Section 2030.30 of the Code of Civil Procedure.

4. I have not previously propounded any interrogatories to this party. I am simultaneously propounding official form interrogatories.

5. This set of special interrogatories contains a total of one hundred and forty-three (143) specially prepared interrogatories.

6. I am familiar with the issues and the previous discovery conducted by all of the parties in the case.

7. I have personally examined each of the questions in this set of interrogatories.

8. This number of questions is warranted under Section 2030.040 of the Code of Civil Procedure because of the complexity of the existing and potential issues, the quantity of the existing and potential issues, the financial burden on Plaintiff of conducting discovery without the use of these interrogatories, and the expedience of using this method of discovery. The questions contained in this set of special interrogatories are necessary to obtain information regarding the facts on which Plaintiff bases its claims, as well as facts relevant to Respondent's affirmative defenses.

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1 9. None of the questions in this set of interrogatories is being propounded for any
2 improper purpose, such as to harass the party, or the attorney for the party, to whom it is
3 directed, or to cause unnecessary delay or needless increase in the cost of litigation.

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

6 Executed on this twenty-first day of May, 2014, at Los Angeles, California.

7
8 
9 Maryann R. Marzano

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PROOF OF SERVICE

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 action. My business address is 6310 San Vicente Boulevard, Suite 510, Los Angeles, California 90048.

On May 22, 2014, I served the foregoing document, described as **PLAINTIFF WADE ROBSON'S FIRST SET OF SPECIAL INTERROGATORIES TO DEFENDANT MJJ PRODUCTIONS, INC.** on each interested party in this action, as follows:

Howard Weitzman, Esq.
Jonathan Steinsapir, Esq.
Kinsella Weitzman Iser Kump & Aldisert LLP
808 Wilshire Boulevard, 3rd Floor
Santa Monica, CA 90401

Jeryll S. Cohen, Esq.
Hoffman, Sabban & Watenmaker, P.C.
10880 Wilshire Boulevard, Suite 2200
Los Angeles, California, 90024

Service was accomplished as follows.

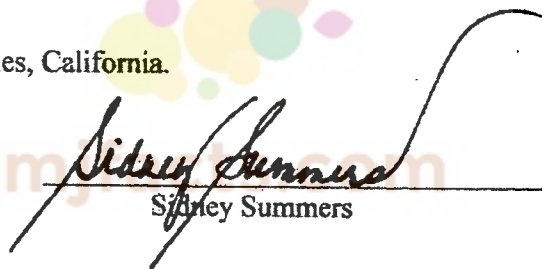
☒ (BY U.S. MAIL)

☒ I deposited such envelope in the mail at Los Angeles, California. The envelope was mailed with postage thereon fully prepaid.

☒ I am readily familiar with the business practice of my place of employment in respect to the collection and processing of correspondence, pleadings and notices for mailing with United States Postal Service. The foregoing sealed envelope was placed for collection and mailing this date consistent with the ordinary business practice of my place of employment, so that it will be picked up this date with postage thereon fully prepaid at Beverly Hills, California, in the ordinary course of such business.

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

Executed on May 22, 2014, at Los Angeles, California.


Sidney Summers

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