

GRADSTEIN & MARZANO, P.C.  
6310 SAN VICENTE BLVD, SUITE 510  
LOS ANGELES, CALIFORNIA 90048  
TELEPHONE: 323-776-3100

**GRADSTEIN & MARZANO, P.C.**  
Henry Gradstein (State Bar No. 89747)  
hgradstein@gradstein.com  
Maryann R. Marzano (State Bar No. 96867)  
mmarzano@gradstein.com  
Matthew A. Slater (State Bar No. 259986)  
mslater@gradstein.com  
6310 San Vicente Boulevard, Suite 510  
Los Angeles, California 90048  
Phone: (323) 776-3100

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 VENTURES, INC.**

PROPOUNDING PARTY:

PLAINTIFF WADE ROBSON

RESPONDING PARTY:

DEFENDANT MJJ VENTURES, INC.

SET NO.:

One (1)

EXH-2

GRADSTEIN & MARZANO, P.C.  
6310 SAN VICENTE BLVD, SUITE 510  
LOS ANGELES, CALIFORNIA 90048  
TELEPHONE: 323-778-3100

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

### DEFINITIONS

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

1. As used herein, the term "CORPORATION" means MJJ Ventures, Inc. and any and all persons who formerly acted or purported to act and/or currently act or purport to act on behalf of it or any of them.

2. As used herein, the term "DECEDENT" means Michael Joseph Jackson, who is also named as DOE 1 as defined in paragraph 2 of the Second Amended Complaint filed on February 19, 2014.

3. As used herein, the terms "and" and "or" are to be construed both conjunctively and disjunctively as necessary to make these Requests inclusive rather than exclusive. The singular form of a noun or pronoun includes the plural form and vice versa.

### SPECIAL INTERROGATORIES

#### SPECIAL INTERROGATORY NO. 1:

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

#### SPECIAL INTERROGATORY NO. 2:

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

#### SPECIAL INTERROGATORY NO. 3:

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

07/28/2014

1 **SPECIAL INTERROGATORY NO. 4:**

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

4 **SPECIAL INTERROGATORY NO. 5:**

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

7 **SPECIAL INTERROGATORY NO. 6:**

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

10 **SPECIAL INTERROGATORY NO. 7:**

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

13 **SPECIAL INTERROGATORY NO. 8:**

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

16 **SPECIAL INTERROGATORY NO. 9:**

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

19 **SPECIAL INTERROGATORY NO. 10:**

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

22 **SPECIAL INTERROGATORY NO. 11:**

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

25 **SPECIAL INTERROGATORY NO. 12:**

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

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1 **SPECIAL INTERROGATORY NO. 13:**

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

4 **SPECIAL INTERROGATORY NO. 14:**

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

7 **SPECIAL INTERROGATORY NO. 15:**

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

11 **SPECIAL INTERROGATORY NO. 16:**

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

15 **SPECIAL INTERROGATORY NO. 17:**

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

19 **SPECIAL INTERROGATORY NO. 18:**

20 Please identify all business entities over which DECEDENT exercised control that paid for  
21 Wade Robson to undertake any travel during the time period from approximately 1990 through  
22 1997.

23 **SPECIAL INTERROGATORY NO. 19:**

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

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07/28/2014

1 **SPECIAL INTERROGATORY NO. 20:**

2 Please identify all business entities over which DECEDENT exercised control that paid for  
3 Joy Robson to undertake any travel during the time period from approximately 1990 through  
4 1997.

5 **SPECIAL INTERROGATORY NO. 21:**

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

9 **SPECIAL INTERROGATORY NO. 22:**

10 Please identify all business entities over which DECEDENT exercised control that paid for  
11 Chantal Robson to undertake any travel during the time period from approximately 1990 through  
12 1997.

13 **SPECIAL INTERROGATORY NO. 23:**

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

16 **SPECIAL INTERROGATORY NO. 24:**

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

19 **SPECIAL INTERROGATORY NO. 25:**

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

22 **SPECIAL INTERROGATORY NO. 26:**

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

25 **SPECIAL INTERROGATORY NO. 27:**

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

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GRADSTEIN & MARZANO, P.C.  
6310 SAN VICENTE BLVD., SUITE 510  
LOS ANGELES, CALIFORNIA 90048  
TELEPHONE: 323-776-3100

07/28/2014

1 **SPECIAL INTERROGATORY NO. 28:**

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

5 **SPECIAL INTERROGATORY NO. 29:**

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

9 **SPECIAL INTERROGATORY NO. 30:**

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

13 **SPECIAL INTERROGATORY NO. 31:**

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

17 **SPECIAL INTERROGATORY NO. 32:**

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

21 **SPECIAL INTERROGATORY NO. 33:**

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

25 **SPECIAL INTERROGATORY NO. 34:**

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

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6310 SAN VICENTE BLVD., SUITE 510  
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TELEPHONE: 323-778-3100

07/28/2014

**SPECIAL INTERROGATORY NO. 35:**

Please identify all persons to whom MJJ Productions, Inc. paid consideration 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. 36:**

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

**SPECIAL INTERROGATORY NO. 37:**

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

**SPECIAL INTERROGATORY NO. 38:**

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

**SPECIAL INTERROGATORY NO. 39:**

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

**SPECIAL INTERROGATORY NO. 40:**

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

**SPECIAL INTERROGATORY NO. 41:**

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

**SPECIAL INTERROGATORY NO. 42:**

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

**SPECIAL INTERROGATORY NO. 43:**

Please identify all persons who have filed lawsuits against MJJ Productions, Inc. for sexual molestation by DECEDENT.

07/28/2014

1 **SPECIAL INTERROGATORY NO. 44:**

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

4 **SPECIAL INTERROGATORY NO. 45:**

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

7 **SPECIAL INTERROGATORY NO. 46:**

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

10 **SPECIAL INTERROGATORY NO. 47:**

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

13 **SPECIAL INTERROGATORY NO. 48:**

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

16 **SPECIAL INTERROGATORY NO. 49:**

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

18 **SPECIAL INTERROGATORY NO. 50:**

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

21 **SPECIAL INTERROGATORY NO. 51:**

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

24 **SPECIAL INTERROGATORY NO. 52:**

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

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07/28/2014

**SPECIAL INTERROGATORY NO. 53:**

Please identify all persons who have asserted claims against MJJ Productions, 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 Productions, 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 Productions, 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 Productions, 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.

GRADSTEIN & MARZANO, P.C.  
6310 SAN VICENTE BLVD, SUITE 510  
LOS ANGELES, CALIFORNIA 90048  
TELEPHONE: 323-776-3100

07/28/2014

**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 Productions, 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 Productions, 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 Productions, 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 Productions, Inc. paid consideration to settle claims for battery by DECEDENT.

GRADSTEIN & MARZANO, P.C.  
6310 SAN VICENTE BLVD, SUITE 510  
LOS ANGELES, CALIFORNIA 90048  
TELEPHONE: 323-778-3100

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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 Productions, 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 Productions, Inc. for  
22 seduction 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 Productions, Inc. entered into agreements to  
28 settle claims for seduction by DECEDENT.

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 Productions, Inc. paid consideration to settle  
6 claims 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 Productions, Inc. for  
24 willful 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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GRADSTEIN & MARZANO, P.C.  
6310 SAN VICENTE BLVD, SUITE 510  
LOS ANGELES, CALIFORNIA 90048  
TELEPHONE: 323-776-3100

107/28/2014

1 **SPECIAL INTERROGATORY NO. 91:**

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

4 **SPECIAL INTERROGATORY NO. 92:**

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

7 **SPECIAL INTERROGATORY NO. 93:**

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

10 **SPECIAL INTERROGATORY NO. 94:**

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

13 **SPECIAL INTERROGATORY NO. 95:**

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

16 **SPECIAL INTERROGATORY NO. 96:**

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

19 **SPECIAL INTERROGATORY NO. 97:**

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

22 **SPECIAL INTERROGATORY NO. 98:**

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

25 **SPECIAL INTERROGATORY NO. 99:**

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

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GRADSTEIN & MARZANO, P.C.  
6910 SAN VICENTE BLVD, SUITE 510  
LOS ANGELES, CALIFORNIA 90048  
TELEPHONE: 323-776-3100

07/28/2014

1 **SPECIAL INTERROGATORY NO. 100:**

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

4 **SPECIAL INTERROGATORY NO. 101:**

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

7 **SPECIAL INTERROGATORY NO. 102:**

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

10 **SPECIAL INTERROGATORY NO. 103:**

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

13 **SPECIAL INTERROGATORY NO. 104:**

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

16 **SPECIAL INTERROGATORY NO. 105:**

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

19 **SPECIAL INTERROGATORY NO. 106:**

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

22 **SPECIAL INTERROGATORY NO. 107:**

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

25 **SPECIAL INTERROGATORY NO. 108:**

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

27 **SPECIAL INTERROGATORY NO. 109:**

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

07/28/2014

**SPECIAL INTERROGATORY NO. 110:**

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

**SPECIAL INTERROGATORY NO. 111:**

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

**SPECIAL INTERROGATORY NO. 112:**

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

**SPECIAL INTERROGATORY NO. 113:**

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

**SPECIAL INTERROGATORY NO. 114:**

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

**SPECIAL INTERROGATORY NO. 115:**

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

**SPECIAL INTERROGATORY NO. 116:**

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

**SPECIAL INTERROGATORY NO. 117:**

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

**SPECIAL INTERROGATORY NO. 118:**

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

GRADSTEIN & MARZANO, P.C.  
6310 SAN VICENTE BLVD, SUITE 510  
LOS ANGELES, CALIFORNIA 90048  
TELEPHONE: 323-778-3100

07/28/2014

1 **SPECIAL INTERROGATORY NO. 119:**

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

4 **SPECIAL INTERROGATORY NO. 120:**

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

6 **SPECIAL INTERROGATORY NO. 121:**

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

8 **SPECIAL INTERROGATORY NO. 122:**

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

11 **SPECIAL INTERROGATORY NO. 123:**

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

14 **SPECIAL INTERROGATORY NO. 124:**

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

17 **SPECIAL INTERROGATORY NO. 125:**

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

20 **SPECIAL INTERROGATORY NO. 126:**

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

23 **SPECIAL INTERROGATORY NO. 127:**

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

26 **SPECIAL INTERROGATORY NO. 128:**

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



GRADSTEIN & MARZANO, P.C.  
8310 SAN VICENTE BLVD., SUITE 510  
LOS ANGELES, CALIFORNIA 90048  
TELEPHONE: 323-778-3100

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1 **SPECIAL INTERROGATORY NO. 129:**

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

4 **SPECIAL INTERROGATORY NO. 130:**

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

7 **SPECIAL INTERROGATORY NO. 131:**

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

10 **SPECIAL INTERROGATORY NO. 132:**

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

13 **SPECIAL INTERROGATORY NO. 133:**

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

16 **SPECIAL INTERROGATORY NO. 134:**

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

19 **SPECIAL INTERROGATORY NO. 135:**

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

22 **SPECIAL INTERROGATORY NO. 136:**

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

25 **SPECIAL INTERROGATORY NO. 137:**

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

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GRADSTEIN & MARZANO, P.C.  
6319 SAN VICENTE BLVD., SUITE 510  
LOS ANGELES, CALIFORNIA 90048  
TELEPHONE: 323-778-3100

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**SPECIAL INTERROGATORY NO. 138:**

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

**SPECIAL INTERROGATORY NO. 139:**

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

**SPECIAL INTERROGATORY NO. 140:**

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

**SPECIAL INTERROGATORY NO. 141:**

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

**SPECIAL INTERROGATORY NO. 142:**

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

**SPECIAL INTERROGATORY NO. 143:**

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

DATED: May 21, 2014

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

By: 

Maryann R. Marzano  
Attorneys for Plaintiff WADE ROBSON

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

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8 Maryann R. Marzano  
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GRADSTEIN & MARZANO, P.C.  
6310 SAN VICENTE BLVD, SUITE 510  
LOS ANGELES, CALIFORNIA 90048  
TELEPHONE: 323-778-3100

07/28/2014



**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 VENTURES, 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.

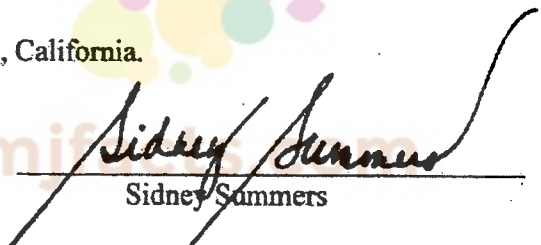
☒ (BY U.S. MAIL)

☒ 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