

1 ARNOLD & PORTER LLP  
Ronald L. Johnston (State Bar No. 057418)  
Eric D. Mason (State Bar No. 259233)  
2 777 South Figueroa Street, 44th Floor  
Los Angeles, California 90017-5844  
3 Telephone: (213) 243-4000  
Facsimile: (213) 243-4199  
4 Ronald.Johnston@aporter.com  
Eric.Mason@aporter.com  
5

6 LAWYERS' COMMITTEE FOR  
CIVIL RIGHTS UNDER LAW  
7 Linda Mullenbach (*pro hac vice* admission pending)  
1401 New York Avenue, NW, Suite 400  
8 Washington, DC 20005  
Telephone: (202) 662-8600  
9 Facsimile: (202) 783-0857  
LMullenbach@lawyerscommittee.org  
10

11 Attorneys for Plaintiffs

12 SUPERIOR COURT OF THE STATE OF CALIFORNIA  
13 COUNTY OF LOS ANGELES

14 MARCIA BAKER, an individual; et al.,

15 Plaintiffs,

16 v.

17 PLATINUM LAW GROUP, INC., a  
18 corporation; et al.,

19 Defendants.  
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Case No.: BC508727

**PLAINTIFFS' FIRST SET OF JUDGMENT  
DEBTOR INTERROGATORIES TO JEFF  
MARKLEIN**

1 PROPOUNDING PARTY: Plaintiffs Marcia Baker, et al.

2 RESPONDING PARTY: Defendant Jeff Marklein

3 SET NO: One

4 Pursuant to California Code of Civil Procedure § 708.010 et seq., Plaintiffs Marcia Baker,  
5 Denise Burns, Juanita Craig, Michael Craig, Julia Cringle, Carol Frost, Dwight Reep, and Roberto  
6 Velasquez (collectively, "Plaintiffs") hereby issue their First Set of Judgment Debtor Interrogatories  
7 (the "Interrogatories") to Defendant Jeff Marklein ("Stevenson") and hereby request that Stevenson  
8 respond to the following special interrogatories separately and fully in writing and under oath,  
9 within thirty (30) days of service.

10 **DEFINITIONS**

11 1. "ADDRESS" means the street address, including the city, state, and zip code.

12 2. "COMMUNICATION" means the transmittal of information (in the form of facts,  
13 ideas, inquiries, or otherwise) including, without limitation, meetings, conferences, seminars,  
14 discussions, conversations, telephone calls, recordings, photographs, notes, memoranda, letters,  
15 facsimiles, telexes, electronic mail, or electronic media.

16 3. "COMMUNITY PROPERTY" means all property, real or personal and wherever  
17 situated, acquired by YOUR spouse while married to YOU and domiciled in Arizona, California,  
18 Idaho, Louisiana, Nevada, new Mexico, Texas, Washington, or Wisconsin.

19 4. "DESCRIBE IN DETAIL" means to describe fully by reference to underlying facts  
20 rather than by ultimate facts or conclusions of facts or law and to particularize as to time, place, and  
21 manner, to IDENTIFY ALL natural persons or entities with knowledge of those facts, and to  
22 IDENTIFY ALL DOCUMENTS concerning such facts.

23 5. "DOCUMENT(S)" refers inclusively to any writing of any kind, including originals  
24 and all non-identical copies (whether different from the original by reason of any notation made on  
25 such copies or otherwise). The term "DOCUMENT(S)" shall include, without limitation, the  
26 following items, whether printed or reproduced by any process, or written or produced by hand or  
27 stored in computer memory, magnetic or hard disk or other data storage medium, and whether or  
28

1 not claimed to be privileged, confidential or otherwise excludable from discovery, namely, notes,  
2 letters, correspondence, COMMUNICATION, e-mails, telegrams, memoranda, summaries or  
3 records of telephone conversations, summaries or records of personal conversations or meetings,  
4 diaries, reports, photographs, video images, minutes or records of meetings, summaries of  
5 interviews, reports, or investigations, drafts of DOCUMENTS, term sheets, and all other material  
6 fixed in a tangible medium of whatever kind known to YOU or in YOUR possession, custody, or  
7 control.

8 6. "IDENTIFY" means to state the following: (1) when used with respect to a  
9 PERSON, the name of the PERSON, the ADDRESS of the PERSON, and the PERSON's other  
10 identifying information, such as title and affiliation to any other PERSON; and (2) when used with  
11 respect to a DOCUMENT, information describing the DOCUMENT with sufficient particularity so  
12 as to allow that DOCUMENT to be the subject of a request for production, including, but not  
13 limited to, title, author, recipient(s), and date the DOCUMENT was created.

14 7. "PERSON" means as so defined in Evidence Code section 175 and includes a  
15 natural person, firm, association, organization, partnership, business, trust, limited liability  
16 company, corporation, or public entity.

17 8. "YOU" and "YOUR" refer to Defendant Jeff Marklein, and his agents, attorneys,  
18 and any other PERSON acting for or on his behalf.

19 **JUDGMENT DEBTOR INTERROGATORIES**

20 **INTERROGATORY NO. 1**

21 IDENTIFY all names and/or aliases YOU have used in the past--including, but not limited  
22 to the dates on which you have used such names and/or aliases.

23 **INTERROGATORY NO. 2**

24 IDENTIFY YOUR current contact information--including, but not limited to YOUR work  
25 address, YOUR home address, YOUR work telephone number, YOUR home telephone number,  
26 YOUR cellular telephone number, and all of YOUR e-mail addresses.

1 **INTERROGATORY NO. 3**

2 IDENTIFY YOUR current residence--including, but not limited to: (i) the address, (ii) how  
3 long YOU have lived there; (iii) whether you own or rent the residence; and (iv) the amount of your  
4 monthly rent or monthly mortgage payment, if any.

5 **INTERROGATORY NO. 4**

6 DESCRIBE IN DETAIL YOUR current employment, including but not limited to (i) YOUR  
7 employer's name and address; (ii) YOUR position, (iii) the amount YOU are paid for the job; and  
8 (iv) the dates on which you are paid.

9 **INTERROGATORY NO. 5**

10 DESCRIBE IN DETAIL all real estate owned in whole or in part by you, whether in YOUR  
11 name or not -- specifying as to each piece of real estate: (i) the address; (ii) date of acquisition; (iii)  
12 most recent assessed value; (iv) fair market value; and (v) any income derived therefrom.

13 **INTERROGATORY NO. 6**

14 DESCRIBE IN DETAIL all business entities owned in whole or in part by YOU, whether  
15 in YOUR name or that of another and wherever located.

16 **INTERROGATORY NO. 7**

17 DESCRIBE IN DETAIL all property that YOU own in whole or in part, whether in YOUR  
18 name or that of another and wherever located--including, but not limited to: (i) all checking and  
19 savings accounts, as well as all bank names, account numbers and balances; (ii) jewelry; (iii) motor  
20 vehicles or watercraft (make, model, year, license number, serial/VIN number, state of registration,  
21 and fair market value; (iv) debts or notes owed by another to YOU; (v) stocks, bonds, or other  
22 securities; and (vi) life insurance policies (date of policy, face value and cash surrender value, and  
23 beneficiaries).

24 **INTERROGATORY NO. 8**

25 DESCRIBE IN DETAIL all safes or safe-deposit boxes used by YOU, including but not  
26 limited to the banking institution where it is located, in whose name it is listed, how it is numbered  
27 or identified, and its contents.

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1 **INTERROGATORY NO. 9**

2 DESCRIBE IN DETAIL any pension, disability compensation, retirement pay, or other  
3 benefit YOU have received at any time, as well as the amount thereof.

4 **INTERROGATORY NO. 10**

5 DESCRIBE IN DETAIL any vested future interest YOU have in any property or in the  
6 payment of any money, specifying as to each interest, (i) the location of the property or money; (ii)  
7 the identity and address of all PERSONS that may be involved; (ii) the circumstances that will  
8 cause the property or money to inure to YOUR benefit; and (iv) the probable value of such property  
9 or money.

10 **INTERROGATORY NO. 11**

11 DESCRIBE IN DETAIL any money or property held in trust for YOU, including but not  
12 limited to, (i) the name of the trustee or fiduciary; (ii) the name of/on the trust; (ii) the money or  
13 property held in trust; (iv) the value thereof; (v) the date, if any, upon which the trust is to terminate;  
14 (vi) the amount of income which is or may be received therefrom; (vii) the timing or schedule of  
15 any such payments; (viii) the value of the corpus of the trust which may be distributed to YOU; (ix)  
16 the expected date of distribution.

17 **INTERROGATORY NO. 12**

18 DESCRIBE IN DETAIL any transfer of over \$500 made to or from YOU from May 13,  
19 2013 to present---specifying as to each transfer: (i) the name of the transferee; (ii) the name of the  
20 transferor; (iii) the amount transferred; (iv) the date of the transfer; and (v) the reason for the  
21 transfer.

22 **INTERROGATORY NO. 13**

23 DESCRIBE IN DETAIL any COMMUNITY PROPERTY held by YOUR spouse--  
24 specifying as to each item of COMMUNITY PROPERTY: (i) the item; (ii) location; and (iii) value.

25 **INTERROGATORY NO. 14**

26 DESCRIBE IN DETAIL any retirement account held by YOU, including but not limited to  
27 individual retirement accounts (IRAs), pensions, and 401(k) plans--specifying as to each account:  
28

1 (i) the financial institution where the account is held; (ii) the identification number of the account;  
2 and (iii) the current value of the account.

3 \_\_\_\_\_  
4 Dated: June 3, 2013

Respectfully submitted,

6 By: \_\_\_\_\_

7 Ronald L. Johnston  
8 Eric D. Mason  
9 ARNOLD & PORTER LLP

10 Linda Mullenbach  
11 LAWYERS' COMMITTEE FOR CIVIL  
12 RIGHTS UNDER LAW

13 Attorneys for Plaintiffs  
14 MARCIA BAKER, DENISE BURNS,  
15 JUANITA CRAIG, MICHAEL CRAIG,  
16 JULIA CRINGLE, CAROL FROST,  
17 DWIGHT REEP, and ROBERTO  
18 VELASQUEZ