

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.
20
21
22
23
24
25
26
27
28

Case No.: BC508727

**PLAINTIFFS' FIRST SET OF JUDGMENT
DEBTOR REQUESTS FOR PRODUCTION
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.*, and 2031.210 *et seq.*,
5 Plaintiffs Marcia Baker, Denise Burns, Juanita Craig, Michael Craig, Julia Cringle, Carol Frost,
6 Dwight Reep, and Roberto Velasquez (collectively, "Plaintiffs") hereby request that Defendant Jeff
7 Marklein produce the documents and things described below for inspection and copying on June
8 _____, 2015 at 10:00 a.m. at the offices of Arnold & Porter LLP, 777 South Figueroa Street, 44th
9 Floor, Los Angeles, California, 90017.

10 **INSTRUCTIONS**

11 In producing the DOCUMENTS and things requested, YOU are requested to produce all
12 DOCUMENTS and things known or available to YOU regardless of whether such DOCUMENTS
13 and things are possessed directly by YOU or YOUR agents, employees, representatives,
14 investigators, or by YOUR attorneys or their agents, employees, representatives or investigators. If
15 any of the DOCUMENTS and things requested cannot be produced in full, produce them to the
16 extent possible, specifying YOUR reasons for YOUR inability to produce them in full, and stating
17 whatever information, knowledge, or belief YOU have concerning the unproduced portion. If any
18 DOCUMENTS and things requested are no longer in existence, state for each DOCUMENT or
19 thing: (a) the type of DOCUMENT or thing; (b) the type of information contained; (c) the date on
20 which it ceased to exist; (d) the circumstances under which it ceased to exist; (e) the identity of
21 ALL persons having knowledge of the circumstances under which it ceased to exist; (f) the identity
22 of ALL persons having knowledge of its contents; and (g) the identity of the author thereof.

23 YOU must make a diligent search of all DOCUMENTS and other materials available to
24 YOU and make a reasonable inquiry of persons with knowledge.

25 In producing the DOCUMENTS and writings requested herein, please produce them in their
26 original file folders, if any, or in lieu thereof, attach to the set of DOCUMENTS produced from a
27 given file a photostatic or electrostatic duplicate of all written or printed material on the original file
28 folder. In addition, the DOCUMENTS shall be produced in the same sequence as they are

1 contained or found in the original file folder. The integrity and internal sequence of the requested
2 DOCUMENTS within each file folder shall not be disturbed. Under no circumstances shall
3 DOCUMENTS from any file folder be commingled with DOCUMENTS from any other file folder.

4 Please produce each DOCUMENT requested herein with an indication of the particular
5 paragraph or subparagraph of these demands to which the DOCUMENT is responsive.

6 If a request calls for the production of a DOCUMENT as to which you claim any privilege
7 or any other ground for withholding or otherwise failing to produce any requested DOCUMENT,
8 please provide, at the time at which the other DOCUMENTS are produced, a log which, separately
9 for each DOCUMENT not produced, sets forth: (a) the identity of the author thereof, the parties
10 thereto, and any person who helped in its preparation; (b) the title or other identifying data sufficient
11 to describe it for purposes of a subpoena duces tecum; (c) the date of the DOCUMENT, or, if no
12 date appears thereon, the approximate date; (d) the identity of each person to whom the
13 DOCUMENT, or any copy thereof, was transmitted, shown, or disclosed by any entity; (e) the
14 purpose for which the DOCUMENT was prepared; (f) the non-privileged contents of the
15 DOCUMENTS, if any portion thereof is not subject to a claim of privilege; and (g) each and every
16 fact or basis on which you claim such a privilege or ground for your refusal to produce, in such
17 detail as would be required for Plaintiffs to test the claim of privilege on a motion to compel.

18 DEFINITIONS

- 19 1. "ADDRESS" means the street address, including the city, state, and zip code.
- 20 2. "COMMUNICATION" means the transmittal of information (in the form of facts,
21 ideas, inquiries, or otherwise) including, without limitation, meetings, conferences, seminars,
22 discussions, conversations, telephone calls, recordings, photographs, notes, memoranda, letters,
23 facsimiles, telexes, electronic mail, or electronic media.
- 24 3. "COMMUNITY PROPERTY" means all property, real or personal and wherever
25 situated, acquired by YOUR spouse while married to YOU and domiciled in Arizona, California,
26 Idaho, Louisiana, Nevada, new Mexico, Texas, Washington, or Wisconsin.
- 27 4. "DESCRIBE IN DETAIL" means to describe fully by reference to underlying facts
28 rather than by ultimate facts or conclusions of facts or law and to particularize as to time, place, and

1 manner, to IDENTIFY ALL natural persons or entities with knowledge of those facts, and to
2 IDENTIFY ALL DOCUMENTS concerning such facts.

3 5. "DOCUMENT(S)" refers inclusively to any writing of any kind, including originals
4 and all non-identical copies (whether different from the original by reason of any notation made on
5 such copies or otherwise). The term "DOCUMENT(S)" shall include, without limitation, the
6 following items, whether printed or reproduced by any process, or written or produced by hand or
7 stored in computer memory, magnetic or hard disk or other data storage medium, and whether or
8 not claimed to be privileged, confidential or otherwise excludable from discovery, namely, notes,
9 letters, correspondence, COMMUNICATION, e-mails, telegrams, memoranda, summaries or
10 records of telephone conversations, summaries or records of personal conversations or meetings,
11 diaries, reports, photographs, video images, minutes or records of meetings, summaries of
12 interviews, reports, or investigations, drafts of DOCUMENTS, term sheets, and all other material
13 fixed in a tangible medium of whatever kind known to YOU or in YOUR possession, custody, or
14 control.

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

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

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

1 **REQUEST FOR PRODUCTION NO. 9**

2 All DOCUMENTS relating to any vested future interest YOU have in any property or in the
3 payment of any money.

4 **REQUEST FOR PRODUCTION NO. 10**

5 All DOCUMENTS relating to any money or property held in trust for YOU.

6 **REQUEST FOR PRODUCTION NO. 11**

7 All DOCUMENTS relating to any transfer of over \$500 made to or from YOU from May
8 13, 2013 to present.

9 **REQUEST FOR PRODUCTION NO. 12**

10 All DOCUMENTS relating to any COMMUNITY PROPERTY held by YOUR spousee.

11 **REQUEST FOR PRODUCTION NO. 14**

12 All DOCUMENTS relating to any retirement account held by you.

13 Dated: May _____, 2015

14 Respectfully submitted,

15
16 By: _____

17 Ronald L. Johnston
18 Eric D. Mason
19 ARNOLD & PORTER LLP

20 Linda Mullenbach
21 LAWYERS' COMMITTEE FOR CIVIL
22 RIGHTS UNDER LAW

23 Attorneys for Plaintiffs
24 MARCIA BAKER, DENISE BURNS,
25 JUANITA CRAIG, MICHAEL CRAIG,
26 JULIA CRINGLE, CAROL FROST,
27 DWIGHT REEP, and ROBERTO
28 VELASQUEZ