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	Attorneys for Defendants Pinscreen, Inc. and Dr. Hao Li		
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11	SUPERIOR COURT OF CALIFORNIA		
12			
	DR. IMAN SADEGHI, an individual,	Case No. BC709376	
14		Assigned for all purposes to Hon. Lia Martin, Dept. 16	
15	V.	DEFENDANT DR. HAO LI'S AMENDED	
	PINSCREEN, INC., a Delaware Corporation; DR. HAO LI, an individual; YEN-CHUN CHEN,	RESPONSE TO PLAINTIFF DR. IMAN SADEGHI'S FORM INTERROGATORIES	
	an individual; LIWEN HU, an individual; HAN- WEI KUNG, an individual; and DOES 1 through	(GENERAL), SET ONE	
18	100,		
19	Defendants.		
20		Complaint filed: June 11, 2018	
21	PROPOUNDING PARTY: PLAINTIFF DR. IMA	N SADEGHI	
	RESPONDING PARTY: DEFENDANT DR. HAO LI		
23	SET NUMBER: ONE		
24			
25		edure §2030.210 et seq., Defendant DR. HAO LI	
26	(hereinafter, "Defendant" or "Responding Party") hereby responds to the Form Interrogatories, Set One,		
27	propounded by Plaintiff DR. IMAN SADEGHI (hereafter "Plaintiff" or "Propounding Party") as follows:		
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### GENERAL OBJECTIONS

This and all other requests in this set of discovery are premature, not relevant to the subject matter 3 | involved in the pending action or the determination of any motion, and are not reasonably calculated to 4 | lead to the discovery of admissible evidence. As set forth in Defendants' meet and confer letter of | 5 | September 18, 2018, this request refers or is related to allegations in the original complaint, which 6 | Plaintiff has amended in light of Defendants' meet and confer letter setting forth the grounds upon which | each and every cause of action is subject to demurrer; therefore, the requests refer to a pleading that is no 8 | longer operative. Moreover, Plaintiff's amended pleading does not state a claim upon which relief can 9 | be granted, and is subject to both demurrer and motion to strike. Defendant is not required to respond to discovery where the matter is not at issue and every cause of action is subject to demurrer. Moreover, | Plaintiff's amended pleading does not state a claim upon which relief can be granted, and is subject to | 12 both demurrer and motion to strike. Defendant is not required to respond to discovery where the matter 13 | is not at issue and every cause of action is subject to demurrer. and every cause of action is subject to 14 | demurrer. (See Terminals Equip. Co. v. City and County of San Francisco (1990) 221 Cal. App. 3d 234, 15 | 246-47 ("unless and until [a plaintiff] file[s] a viable complaint stating at least one triable cause of action, . [discovery is] an unnecessary and burdensome additional expense to [defendants]"); Silver v. City of 17 | Los Angeles (1966) 245 Cal. App. 2d 673, 674-75 (where defendant had demurred to the entire complaint, "all concerned should be spared the expense of further proceedings").)

#### RESPONSES TO FORM INTERROGATORIES

# INTERROGATORY NO. 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.)

# AMENDED RESPONSE TO INTERROGATORY NO. 1.1:

Defendant incorporates by reference the General Objections.

Subject to and without in any way waiving the foregoing objections, after a reasonable and good faith effort to obtain the information by inquiry, Defendant responds as follows:

No one aside from myself and my attorneys, whose contact information is set forth on the caption

	page.		
2	INTERROGATORY NO. 2.1:		
3	State:		
4	(a) Your name;		
5	(b) every name you have used in the past;		
6	(c) the dates you used each name.		
	AMENDED RESPONSE TO INTERROGATORY NO. 2.1:		
8	Defendant incorporates by reference the General Objections.		
9	Subject to and without in any way waiving the foregoing objections, after a reasonable and good faitl		
10	effort to obtain the information by inquiry, Defendant responds as follows:		
	(a) Hao Li;		
12	(b) Hao Li		
13	(c) January 17, 1981 to the present.		
14	INTERROGATORY NO. 2.2:		
15	State the date and place of your birth.		
16	AMENDED RESPONSE TO INTERROGGATORY NO. 2.2:		
17	Defendant incorporates by reference the General Objections.		
18	Subject to and without in any way waiving the firmgoing objections, after a masonable and good failt		
19	officer to obtain the information by impairs. Defendant responds as follows:		
20	Sauchetteken, Germany, January 17, 1981 to the present.		
21	INTERROGATORY NO. 2.3:		
22	At the time of the INCIDENT, did you have a driver's linease? If so, state		
23	(a) the state or other isossing entity:		
24	(b) the licenses sumber and type;		
25	(a) the date of bossesses, and		
26	(d) all restrictions.		
27	AMENDED RESPONSE TO INTERROGATORY NO. 2.3:		
28	Defendant incorporates by reference the General Objections. Defendant further objects to this		

this interrogatory on the grounds that it is vague and ambiguous, including but not limited the terms
"statement" and "DVCEDENT." Defundant further objects to this interrogatory to the extent that the
information it socks may violate the personal privacy of third party individuals. Defendant further objects to
this interrogatory to the extent that that the information it seeks is protested by the atturney effect privilege or
the atturney work product doubting.

Subject to and without in any way waiving the foregoing objections, ofter a reasonable and good fields
office to obtain the information by inquiry, and assuming that the team "INCIDENT" nature to Plaintiff's
termination meeting and the events occurring immediately thereafter. Defendant responds as follows:

### INTERROGATORY NO. 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.

### AMENDED RESPONSE TO INTERROGATORY NO. 12.4:

Defendant incorporates by reference the foregoing General Objections. Defendant further objects to this interrogatory on the grounds that it is vague and ambiguous, including but not limited the terms "concerning," "injuries" and "INCIDENT." Defendant further objects to this interrogatory on the grounds that the information it seeks may be protected by the attorney client privilege or the attorney work product doctrine.

Subject to and without in any way waiving the foregoing objections, after a reasonable and good faith effort to obtain the information by inquiry, and assuming that the term "INCIDENT" refers to Plaintiff's

termination meeting and the events occurring immediately thereafter, Defendant responds as follows:

Yes.

- (a) On information and belief, footage was digitally videotaped, therefore there the length cannot be defined by feet. However, the videotape that Defendants have been provided are several minutes in length;
- (b) On information and belief, the videotape includes footage of the following individuals: Dr. Iman Sadeghi; Dr. Hao Li; Yen-Chun "Frances" Chen; Han-Wei Kung; Liwen Hu, Yi Zhou, Ronald Yu, Steven Chen, and Carrie Sun;
- (c) August 7, 2017;
- (d) Defendant is informed and believes that the videotape was recorded by at least two cameras on the premises of 12400 Wilshire Boulevard operated by the building or by building security; and
- (e) Defendant is informed and believes that the original videotape is in the possession, custody, or control of the management of 12400 Wilshire Boulevard, Los Angeles, CA 90025; Pinscreen, Inc. and, on information and belief based on content published on the internet, Plaintiff has a copy of the videotape.

#### INTERROGATORY NO. 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 severed by Code of Civil Procedure sections 2004-210-2004-3000-concerning the INCEDENT? If so, for each item state:

- (a) the type-(dec., diagram, reproduction, or model);
- (v) On name, ADSBRESS, and talophone marker of each PERSON who has be

# AMENDED RESPONSE TO INTERROGATORY NO. 12.5:

Defendant incorporates by reference the flanguing General Objections. Defendant flather objects to this issue ognowy on the grounds that it is vague and ambiguous, including but not limited the terms "concerning," "INCEDENT," and that in the context of this litigation, the terms "diagram," "hependanties," and "model" are vague and ambiguous. Defendant flather objects to this interrogatory on

### INTERROGATORY NO. 50.6:

Is any agreement alleged in the pleading ambiguous? If so, identify each ambiguous agreement and state why it is ambiguous.

# AMENDED RESPONSE TO INTERROGATORY NO. 50.6:

Defendant incorporates by reference the foregoing General Objections. Defendant further objects that the interrogatory is vague, ambiguous, and overbroad as to "agreement alleged in the pleadings." Defendant further objects to this interrogatory to the extent that it seeks documents protected by the attorney-client privilege and/or attorney work product doctrine and/or any other privilege or immunity. Defendant further objects to this Request to the extent that it seeks private, privileged, and confidential commercial, financial, and/or proprietary business information.

Subject to and without in any way waiving the foregoing objections, after a reasonable and good faith effort to obtain the information by inquiry, and assuming that the term "INCIDENT" refers to Plaintiff's termination meeting and the events occurring immediately thereafter, Defendant responds as follows:

I did not employ Plaintiff and therefore this interrogatory is improperly propounded on me in my individual capacity. However, by virtue of my position in Pinscreen, I answer as follows on information and belief:

Not to Responding Party's knowledge.

Dated: March 22, 2019

GREENBERG, WHITCOMBE, TAKEUCHI, GIBSON & GRAYVER, LLP

LAW OFFICES OF BENJAMIN DAVIDSON, P.C.

Bv:

Leonard Grayver

Joel L. Benavides Benjamin Davidson

Attorneys for PINSCREEN, INC. and DR. HAO LI

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#### VERIFICATION

Name	Signature
Hao Li	
I declare under penalty of perforegoing is true and correct and that Angeles, California.	rjury under the laws of the State of California that the this verification is executed on March 21, 2019, in Los
reason. I am informed and believe foregoing document are true. I The	for and on its behalf, and I make this verification for that and on that ground allege that the matters stated in the matters stated in the matters stated in the foregoing document are true of my atters which are stated on information and belief, and as to
of my own knowledge except as to that as to those matters I believe them to	tion. The matters stated in the foregoing document are true hose matters which are stated on information and belief, an be true.
	EFENDANT DR. HAO LI'S AMENDED RESPONSE TO 'S FORM INTERROGATORIES (GENERAL), SET ON
State of California, County of Los A	ngeles )
Los Angeles Superior Court	