

1 JOHN THEODORE DEAN  
(State Bar No. 65600)  
2 Attorney at Law  
2678 Raven Circle  
3 Corona, California 92882  
Telephone: 951-734-3146

4 Attorney for Defendants  
5 ERIC PARK, TAL GOLAN, INFORMATION  
SUPERBRAND, INC., SPORTSPEDIA, INC.,  
6 TRAVELPEDIA, INC., and AUTOPEDIA, INC.

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8 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**  
9 **COUNTY OF ORANGE, CENTRAL JUSTICE CENTER**

10  
11 DAVID MAX,  
12 Plaintiff,  
13 vs.

14 ERIC PARK; TAL GOLAN; INFORMATION  
SUPERBRAND, INC.; SPORTSPEDIA, INC.;  
15 TRAVELPEDIA, INC.; AUTOPEDIA, INC.;  
DOES 1 through 100, inclusive,  
16 Defendants.

CASE NO: 30-2010-00357210

Complaint Filed: March 25, 2010  
Trial Date: None Set

**OBJECTION TO DISCOVERY**

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19 Defendants ERIC PARK, TAL GOLAN, INFORMATION SUPERBRAND, INC.,  
20 SPORTSPEDIA, INC., TRAVELPEDIA, INC., and AUTOPEDIA, INC., ("Responding  
21 Parties") hereby object to the following discovery requests served by Plaintiff DAVID MAX on  
22 May 24, 2010:

- 23 (A) Form Interrogatories to Defendant ERIC PARK  
24 (B) Special Interrogatories to Defendant ERIC PARK  
25 (C) Requests for Admissions to Defendant ERIC PARK  
26 (D) Demand to Produce Documents to Defendant ERIC PARK  
27 (E) Form Interrogatories to Defendant TAL GOLAN  
28 (F) Special Interrogatories to Defendant TAL GOLAN

- 1 (G) Requests for Admissions to Defendant TAL GOLAN  
2 (H) Demand to Produce Documents to Defendant TAL GOLAN  
3 (I) Form Interrogatories to Defendant INFORMATION SUPERBRAND, INC.  
4 (J) Special Interrogatories to Defendant INFORMATION SUPERBRAND, INC.  
5 (K) Requests for Admissions to Defendant INFORMATION SUPERBRAND, INC.  
6 (L) Demand to Produce Documents to Defendant INFORMATION SUPERBRAND,  
7 INC.  
8 (N) Form Interrogatories to Defendant SPORTSPEDIA, INC.  
9 (O) Special Interrogatories to Defendant SPORTSPEDIA, INC.  
10 (P) Requests for Admissions to Defendant SPORTSPEDIA, INC.  
11 (Q) Demand to Produce Documents to Defendant SPORTSPEDIA, INC.  
12 (R) Form Interrogatories to Defendant TRAVELPEDIA, INC.  
13 (S) Special Interrogatories to Defendant TRAVELPEDIA, INC.  
14 (T) Requests for Admissions to Defendant TRAVELPEDIA, INC.  
15 (U) Demand to Produce Documents to Defendant TRAVELPEDIA, INC.  
16 (V) Form Interrogatories to Defendant AUTOPEDIA, INC.  
17 (W) Special Interrogatories to Defendant AUTOPEDIA, INC.  
18 (X) Requests for Admissions to Defendant AUTOPEDIA, INC.  
19 (Y) Demand to Produce Documents to Defendant AUTOPEDIA, INC.

20 An objection is made to each and everyone of the foregoing discovery requests as follows:

- 21 1. In each case, the number of specially prepared interrogatories exceeds 35, and  
22 although attorney for Plaintiff subsequently furnished the declaration required by Code of Civil  
23 Procedure section 2030.050, said party did not comply with code requirements at the time the  
24 specially prepared interrogatories were initially served. In addition, the number of specially  
25 prepared interrogatories is unwarranted, or it is unreasonable to require Responding Parties to  
26 answer within the normal time for a response. In addition, the specially prepared interrogatories  
27 are duplicative, and it is unreasonable to require Responding Parties to separately respond to  
28 duplicate requests.

1           2.     In each case, the number of requests for admission exceeds 35, and although  
2 attorney for Plaintiff subsequently furnished the declaration required by Code of Civil Procedure  
3 section 2033.050, said party did not comply with code requirements at the time the requests for  
4 admission were initially served. In addition, the number of requests for admission is  
5 unwarranted, or it is unreasonable to require Responding Parties to answer within the normal  
6 time for a response. In addition, the requests for admission are duplicative, and it is  
7 unreasonable to require Responding Parties to separately respond to duplicate requests.

8           3.     The scope of the foregoing discovery requests and the documents requested are  
9 overly broad, and the requests are beyond the scope of permissible discovery (not relevant to the  
10 subject matter or likely to lead to discovery of admissible evidence.) Compliance would be  
11 unreasonably difficult and expensive, such that the requests are oppressive and burdensome  
12 under the circumstances.

13           4.     Plaintiff served as the trusted custodian of records for Responding Parties over the  
14 course of many years. Upon termination, Plaintiff failed and refused to return the corporate and  
15 business records belonging to Responding Parties, and Plaintiff wrongfully remains in  
16 possession of such records. Information necessary to complete responses is solely within the  
17 control and custody of Plaintiff. Therefore, the requests are intentionally designed to be  
18 oppressive and burdensome under the circumstances.

19           5.     The information contained in responses is confidential and proprietary to  
20 Responding Parties as privileged or trade secrets. Plaintiff has already exhibited a tendency to  
21 improperly disclose confidential information belonging to Responding Parties publically. If  
22 responses were to be provided, Plaintiff likely would continue to wrongfully disclose such  
23 information.

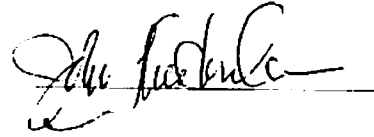
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6. Plaintiff has employed the entirety of the foregoing discovery requests as a discovery method in a manner to specifically cause unwarranted annoyance, embarrassment, or oppression, or undue burden and expense.

Dated: June 28, 2010



JOHN THEODORE DEAN,  
Attorney for Defendants  
ERIC PARK, TAL GOLAN, INFORMATION  
SUPERBRAND, INC., SPORTSPEDIA, INC.,  
TRAVELPEDIA, INC., and AUTOPEDIA, INC.

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**PROOF OF SERVICE**  
§ 1013a(3) Code Civ. Proc. REVISED 1/1/88

STATE OF CALIFORNIA, COUNTY OF RIVERSIDE

I am employed in the County of Riverside, State of California. I am over the age of 18 and not a party to the within action. My business address is: 2678 Raven Circle, Corona, California 92882.

On June 28, 2010, I served the within documents described as:

**OBJECTION TO DISCOVERY**

on the interested parties in this action by placing a true copy thereof enclosed in a sealed envelope addressed as follows:

Ralph Rogari, Esq.  
Rehm & Rogari  
12121 Wilshire Blvd., Suite 600  
Los Angeles CA, 90025

XX **BY MAIL:** I deposited such envelope, with postage thereon fully prepaid, in the mail at Corona, California.

I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. Under that practice, it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Corona, California, in the ordinary course of business. I am aware that on motion of the parties served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing affidavit.

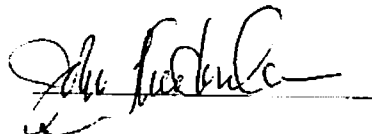
   **BY FAX:** I caused a copy to be transmitted via facsimile to the following telephone number between the hours of 8:30 am. and 5:00 p.m.:

   **BY PERSONAL SERVICE:** I caused to be delivered such envelope by hand to the offices of the addressees.

XX (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

   (Federal) I declare that I am employed in the office of a member of the Bar of this Court at whose direction the service was made.

Executed on June 28, 2010, at Corona, California.



JOHN THEODORE DEAN