

1
2 [attorney name redacted], Esq. (CSBN //////////////#)
3 ///////////////
4 ///////////////
5 ///////////////
6 ///////////////
7 ///////////////

8 Attorneys for Defendants the DIXON FURNITURE, INC,
9 NANCY DIXON, and MATT DIXON
10 **Note: all names have been changed.**

11 **SUPERIOR COURT OF CALIFORNIA**
12 **COUNTY OF LOS ANGELES**

13 TOM BROWN,
14 Plaintiff,
15 vs.
16 DIXON FURNITURE, INC.;
17 NANCY DIXON;
18 MATT DIXON; and
19 DOES 1 through 100,
20 Inclusive
21 Defendants

Case Number: [redacted]
**SPECIAL INTERROGATORIES; DECLARATION
FOR ADDITIONAL DISCOVERY**
Asking Party: DIXON FURNITURE, INC.
Answering Party: TOM BROWN
Set No. ONE
Complaint filed: [redacted]
Assigned to: [redacted]
Dept: [redacted]
Discovery cut-off: none set
Trial date: none set

22 **TO PLAINTIFF TOM BROWN AND HIS ATTORNEY OF RECORD IN THE**
23 **ABOVE-CAPTIONED MATTER:**

24 Defendant DIXON FURNITURE, INC. (hereinafter “**PROPOUNDING PARTY**”)
25 hereby requests, pursuant to Code of Civil Procedure section 2030.210, et seq., that Plaintiff
26 TOM BROWN serve on PROPOUNDING PARTY a written response subscribed under oath
27 within thirty days of service hereof, which shall include all the information requested.
28

1
2
3 In answering these interrogatories, you must furnish all information which is
4 available to you, including information in the possession of your investigators, employees,
5 agents, attorneys, and all other persons or entities directly or indirectly employed by, or
6 otherwise subject to your control.

7 In answering these interrogatories, you must make a diligent search of your records
8 and of other papers and materials in your possession or available to you or your
9 representatives.

10 If you cannot answer any of the following interrogatories in full, after exercising due
11 diligence to secure the information requested, so state, and answer the remainder, stating
12 whatever information or knowledge you have concerning the unanswered portions.

13 These interrogatories are being propounded on the grounds that each is relevant to the
14 subject matter of this action or is reasonably calculated to lead to the discovery of admissible
15 evidence.

16 Failure to respond, or to adequately respond, to these Special Interrogatories will
17 result in a formally noticed motion to compel discovery, and all costs incurred in bringing
18 said motion will be sought.

19 **DEFINITIONS**

20 “**COMPLAINT**” as used herein shall mean the Complaint, filed on [redacted] in the
21 above-entitled action.

22 “**YOU**” and “**YOUR**” as used herein shall mean Plaintiff TOM BROWN.

23 “**CORPORATION**” as used herein shall mean Defendant DIXON FURNITURE,
24 INC.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

“**DIXONS**” as used herein shall mean Defendants NANCY DIXON and MATT DIXON, both individually and jointly.

“**NAMED DEFENDANTS**” as used herein shall mean CORPORATION and the DIXONS.

“**INDIVIDUAL IDENTIFICATION**” as used herein shall mean, with respect to any natural person, the person’s first name, last name, address and telephone number.

“**WC CLAIM**” as used herein shall mean any Worker’s Compensation claim filed by YOU with any government agency at any time within the past 15 years.

“**WC CLAIM IDENTIFICATION**” as used herein shall mean, with respect to any WC CLAIM, the date of the claim, the case number, and the name, address and telephone number of the employer as to which the claim was made.

“**MEDICAL LEAVE**” as used herein shall mean “Family care and medical leave” as defined at Government Code § 12945.2(c)(3)(C).

“**ABUSE**” as used herein shall mean any act of harassment, retaliation, discrimination, physical disability discrimination, perceived physical disability discrimination, intimidation, ostracization, name-calling, slander, insult, humiliation, revenge, and/or other abuse against YOU by any of the NAMED DEFENDANTS, or by any of their agents or employees, or by any combination of such persons, that YOU have alleged in the COMPLAINT or that YOU intend to allege in this action at any hearing or at trial.

“**ABUSE IDENTIFICATION**” as used herein shall mean, with respect to any ABUSE, the date of the ABUSE (or, if the exact date is unknown, the approximate date), the place where the ABUSE occurred, and the name of each person who perpetrated the ABUSE against YOU.

1
2
3 “**ABUSE DESCRIPTION**” as used herein shall mean, with respect to any ABUSE, a
4 detailed description of the ABUSE, including who did what in perpetrating the ABUSE
5 against YOU and including quotations (or approximate quotations) of any abusive statements
6 such persons made in perpetrating the ABUSE against YOU.

7 “**INTERNAL GRIEVANCE**” as used herein shall mean any complaint made by
8 YOU to the NAMED DEFENDANTS or to any of their agents or employees concerning any
9 aspect of YOUR employment at CORPORATION.

10 “**INTERNAL GRIEVANCE IDENTIFICATION**” as used herein shall mean, with
11 respect to any INTERNAL GRIEVANCE, the date of the INTERNAL GRIEVANCE,
12 whether YOU made it in writing or orally, and name of the person to whom YOU directed it.

13 “**INTERNAL GRIEVANCE DESCRIPTION**” as used herein shall mean, with
14 respect to any INTERNAL GRIEVANCE, a detailed description of the matters that YOU
15 complained of therein.

16 “**PROPERTY**” as used herein shall mean the real property in Gardena, California on
17 which CORPORATION operates its business and YOU were required to work when YOU
18 were employed by CORPORATION.

19 “**TERMINATION LETTER**” as used herein shall mean **Exhibit 1** attached hereto,
20 which sets forth a letter dated November 21, 2006 from CORPORATION to YOU stating
21 that YOU are terminated.

22 “**DHS**” as used herein shall mean the County of Los Angeles Department of Health
23 Services.

24 “**DHS LETTER**” as used herein shall mean **Exhibit 2** attached hereto, which sets
25 forth a letter dated November 21, 2006 from DHS to the owner of the PROPERTY.
26

1
2 **“DHS REPORT”** as used herein shall mean any report that YOU made to DHS
3 concerning alleged violations of the Los Angeles County Code on the PROPERTY.
4

5 **“PENDING DOWNSIZE HEDGE DEFENSE”** as used herein shall mean an
6 affirmative defense of the NAMED DEFENDANTS that, prior to YOUR making any DHS
7 REPORT, YOU learned that CORPORATION was about to lay off several employees due to
8 lack of business, and that, as a consequence of such knowledge and as a hedge against
9 YOUR being laid off, YOU made a DHS REPORT so that if YOU were among the
10 employees laid off, YOU could falsely claim that the termination was in retaliation for
11 YOUR making the DHS REPORT.

12 **“INJURY”** as used herein shall mean any of the “injuries” YOU allege in
13 COMPLAINT ¶¶ 23, 37, 52, 66 and 80 that YOU have suffered wherein YOU were
14 “rendered sick, sore, lame, disabled and disordered, both internally and externally, and
15 suffered, among other things, numerous internal injuries, severe fright, shock, pain
16 discomfort and anxiety,” and/or that YOU allege in COMPLAINT ¶¶ 26, 40, 55, 69 and 83
17 that YOU “did suffer, and continue[] to suffer severe and permanent emotional and mental
18 distress and anguish, humiliation, embarrassment, fright, shock, pain, discomfort and
19 anxiety.”

20 **“PERMANENT INJURY”** as used herein shall mean any INJURY that YOU allege
21 in COMPLAINT ¶¶ 23, 37, 52, 66 and 80 to be “reasonably certain to be permanent in
22 character.”

23 **“PHYSICIAN”** as used herein shall mean any physician licensed to practice in any
24 state within the United States.
25
26

1
2 **“NON-ABLE-BODIED DEFENSE ”** as used herein shall mean an affirmative
3 defense of a NAMED DEFENDANTS that, prior to the incidents alleged in the
4 COMPLAINT, and contrary to YOUR allegation in COMPLAINT ¶¶ 25, 39, 54, 68 and 82
5 that “[p]rior to the occurrence of the incidents,” YOU were “an able-bodied individual,”
6 YOU were not able-bodied because, in truth and in fact, YOU were suffering from
7 longstanding or chronic weaknesses in YOUR physical constitution due to any combination
8 of genetic disposition, poor diet, unhealthy lifestyle outside work, tobacco smoking, alcohol
9 consumption, substance abuse, aging, chronic “pre-asthma,” and/or other factors, which
10 weaknesses were unrelated to YOUR employment at CORPORATION but that finally caught
11 up with YOU and manifested as symptoms of illness at a time when YOU happened to be
12 employed at CORPORATION and that YOU have incorrectly attributed to YOUR
13 employment at CORPORATION.
14

15 **“OTHER LITIGATION”** as used herein shall mean any civil or criminal court case,
16 in any jurisdiction, within or without California, in which YOU are, or within the past 15
17 years have been, a party, and the subject matter of which concerns, in whole or in part,
18 YOUR employment by any employer or any claim related to such employment.

19 **“LITIGATION IDENTIFICATION”** as used herein shall mean, with respect to any
20 OTHER LITIGATION, (a) the full title of the court in which such case was filed, (b) the case
21 number, and (c) the full title of the case, including the names of all parties.

22 **“DOCUMENT”** as used herein shall mean each and every “writing” as defined in
23 Section 250 of the California Evidence Code (“handwriting, typewriting, printing,
24 photostating, photographing, photocopying, transmitting by electronic mail or facsimile, and
25 every other means of recording upon any tangible thing, any form of communication or
26

1
2 representation, including letters, words, pictures, sounds, or symbols, or combinations
3 thereof, and any record thereby created, regardless of the manner in which the record has
4 been stored”), including, without limitation, papers, notes, letters, records, reports, books,
5 writings, invoices, statements, billing statements, receipts, accountings, ledgers, blueprints,
6 photostats, photocopies, photographs, insurance policies, minutes, agendas, contracts,
7 agreements, summaries, notations of any sort of conversations, diaries, appointment books,
8 calendars, electronic mails (including emails), computer data (including, without limitation,
9 information and programs stored in a computer, whether or not ever printed out or
10 displayed), all graphic or manual, electronic or digital records or representations of any kind,
11 including, without limitation, photographs, microfiche, microfilm, videotapes, records,
12 motions pictures, tapes, cassettes, discs, and magnetic cards, and every other means of
13 recording upon any tangible thing, and including, without limitation, all drafts, alterations,
14 modifications, changes, amendments, oriNANCYls and all non-identical copies, whether
15 different from the oriNANCYls by reason of any notation made on such copies or otherwise,
16 of any of the foregoing.
17

18 **“DOCUMENT IDENTIFICATION”** as used herein shall mean, with respect to any
19 DOCUMENT, (a) the title or other name of the DOCUMENT, (b) the approximate page
20 count of the DOCUMENT, and (c) the INDIVIDUAL IDENTIFICATION of the person
21 YOU believe possesses or controls the DOCUMENT.

22 / / / /

23 / / / /

24 / / / /

25 / / / /

1
2
3 **SPECIAL INTERROGATORIES**

4 Interrogatory No. 1.

5 For each WC CLAIM please state the WC CLAIM IDENTIFICATION.

6 Interrogatory No. 2.

7 For each WC CLAIM identified in Special Interrogatory No. 1, please state the
8 INDIVIDUAL IDENTIFICATION of any attorney who assisted or represented YOU in
9 making the WC CLAIM.

10 Interrogatory No. 3.

11 For each WC CLAIM identified in Special Interrogatory No. 1, please describe the
12 result, including whether the claim was granted, and if so, the aggregate amount of funds
13 YOU received therefrom.

14 Interrogatory No. 4.

15 For each WC CLAIM identified in Special Interrogatory No. 1, please state the
16 INDIVIDUAL IDENTIFICATION of each person who has personal knowledge related to
17 such WC CLAIM.
18

19 Interrogatory No. 5.

20 For each WC CLAIM identified in Special Interrogatory No. 1, please state the
21 DOCUMENT IDENTIFICATION of each DOCUMENT related to such WC CLAIM.
22

23 Interrogatory No. 6.

24 Please describe all facts supporting YOUR allegation in COMPLAINT ¶ 12 that YOU
25 “made and/or articulated” a WC CLAIM.
26

1
2
3 Interrogatory No. 7.

4 Please describe all facts supporting YOUR allegations in COMPLAINT ¶¶ 17, 18h
5 and 62 that YOUR termination by CORPORATION was not due to lack of business.

6 Interrogatory No. 8.

7 Please state the INDIVIDUAL IDENTIFICATION of each person who has personal
8 knowledge related to YOUR allegations in COMPLAINT ¶¶ 17, 18h and 62 that YOUR
9 termination by CORPORATION was not due to lack of business.

10 Interrogatory No. 9.

11 Please state the DOCUMENT IDENTIFICATION of each DOCUMENT related to
12 YOUR allegations in COMPLAINT ¶¶ 17, 18h and 62 that YOUR termination by
13 CORPORATION was not due to lack of business.
14

15 Interrogatory No. 10.

16 Please describe all facts supporting YOUR allegation in COMPLAINT ¶ 32 that the
17 NAMED DEFENDANTS “regularly employed 50 or more people.”
18

19 Interrogatory No. 11.

20 Please state the INDIVIDUAL IDENTIFICATION of each person who has personal
21 knowledge related to YOUR allegation in COMPLAINT ¶ 32 that the NAMED
22 DEFENDANTS “regularly employed 50 or more people.”
23

24 / / / /

25 / / / /

26 / / / /

1
2
3 Interrogatory No. 12.

4 Please state the DOCUMENT IDENTIFICATION of each DOCUMENT related to
5 YOUR allegation in COMPLAINT ¶ 32 that the NAMED DEFENDANTS “regularly
6 employed 50 or more people.”

7 Interrogatory No. 13.

8 Please describe all facts supporting YOUR allegation in COMPLAINT ¶ 19 that YOU
9 are “within the protected class covered by California Government Code § 12940.”

10 Interrogatory No. 14.

11 Please describe all facts supporting YOUR allegation in COMPLAINT ¶ 33(a) that
12 YOU were “entitled” to take MEDICAL LEAVE “pursuant to the Family Rights and Family
13 Medical Leave Act.”

14 Interrogatory No. 15.

15 Please describe all facts supporting YOUR allegation in COMPLAINT ¶ 33(c) that
16 the NAMED DEFENDANTS or any of their agents or employees “terminated and retaliated
17 against” YOU because of YOUR “entitlement to and/or requesting and/or taking” MEDICAL
18 LEAVE.
19

20 Interrogatory No. 16.

21 Please state the INDIVIDUAL IDENTIFICATION of each person who has personal
22 knowledge related to YOUR allegation in COMPLAINT ¶ 33(c) that the NAMED
23 DEFENDANTS or any of their agents or employees “terminated and retaliated against” YOU
24 because of YOUR “entitlement to and/or requesting and/or taking” MEDICAL LEAVE.
25

1
2
3 Interrogatory No. 17.

4 Please state the DOCUMENT IDENTIFICATION of each DOCUMENT related to
5 YOUR allegation in COMPLAINT ¶ 33(c) that the NAMED DEFENDANTS or any of their
6 agents or employees “terminated and retaliated against” YOU because of YOUR “entitlement
7 to and/or requesting and/or taking” MEDICAL LEAVE.

8 Interrogatory No. 18.

9 In the light of YOUR allegation in COMPLAINT ¶ 15 that YOU “returned to work,”
10 please describe all facts supporting YOUR allegations in COMPLAINT ¶ 33(d) that the
11 NAMED DEFENDANTS or any of their agents or employees “failed to give” YOU “an
12 opportunity at any time to return to work.”

13
14 Interrogatory No. 19.

15 In the light of YOUR allegation in COMPLAINT ¶ 15 that YOU “returned to work,”
16 please describe all facts supporting YOUR allegations in COMPLAINT ¶ 33(e) that the
17 NAMED DEFENDANTS or any of their agents or employees “refused to allow” YOU to
18 retain YOUR “employee status and refused to return” YOU “to work.”

19 Interrogatory No. 20.

20 Please state the ABUSE IDENTIFICATION of each ABUSE.

21
22 Interrogatory No. 21.

23 For each ABUSE identified in Special Interrogatory No. 20, please state the ABUSE
24 DESCRIPTION.

25 / / / /
26

1
2
3 Interrogatory No. 22.

4 For each ABUSE identified in Special Interrogatory No. 20, please state the
5 INDIVIDUAL IDENTIFICATION of each person who has personal knowledge related to
6 such ABUSE.

7 Interrogatory No. 23.

8 For each ABUSE identified in Special Interrogatory No. 20, please state the
9 DOCUMENT IDENTIFICATION of each DOCUMENT related to such ABUSE.

10 Interrogatory No. 24.

11 For each INTERNAL GRIEVANCE that YOU made concerning any ABUSE, please
12 state the INTERNAL GRIEVANCE IDENTIFICATION.
13

14 Interrogatory No. 25.

15 For each INTERNAL GRIEVANCE identified in Special Interrogatory No. 24
16 (concerning ABUSE), please state the INTERNAL GRIEVANCE DESCRIPTION.
17

18 Interrogatory No. 26.

19 For each INTERNAL GRIEVANCE identified in Special Interrogatory No. 24
20 (concerning ABUSE), please describe all facts supporting YOUR allegations in
21 COMPLAINT that the NAMED DEFENDANTS did nothing in response to such
22 INTERNAL GRIEVANCE.
23

24 Interrogatory No. 27.

25 Please describe all facts supporting YOUR allegation in COMPLAINT ¶ 20 that the
26 NAMED DEFENDANTS or any of their agents or employees “knew about, or should have
27

1
2 known about, and failed to investigate and/or properly investigate, prevent or remedy” any
3 “physical disability and perceived physical disability discrimination.”
4

5 Interrogatory No. 28.

6 Please state the INDIVIDUAL IDENTIFICATION of each person who has personal
7 knowledge related to YOUR allegation in COMPLAINT ¶ 20 that the NAMED
8 DEFENDANTS or any of their agents or employees “knew about, or should have known
9 about, and failed to investigate and/or properly investigate, prevent or remedy” any “physical
10 disability and perceived physical disability discrimination.”
11

12 Interrogatory No. 29.

13 Please state the DOCUMENT IDENTIFICATION of each DOCUMENT related to
14 YOUR allegation in COMPLAINT ¶ 20 that the NAMED DEFENDANTS or any of their
15 agents or employees “knew about, or should have known about, and failed to investigate
16 and/or properly investigate, prevent or remedy” any “physical disability and perceived
17 physical disability discrimination.”
18

19 Interrogatory No. 30.

20 Please describe all facts supporting YOUR allegation in COMPLAINT ¶ 34 that the
21 NAMED DEFENDANTS or any of their agents or employees “knew about, or should have
22 known about, and failed to investigate and/or properly investigate, prevent or remedy” any
23 “retaliation and discrimination.”
24

25 Interrogatory No. 31.

26 Please state the INDIVIDUAL IDENTIFICATION of each person who has personal
27 knowledge related to YOUR allegation in COMPLAINT ¶ 34 that the NAMED
28

1
2 DEFENDANTS or any of their agents or employees “knew about, or should have known
3 about, and failed to investigate and/or properly investigate, prevent or remedy” any
4 “retaliation and discrimination.”
5

6 Interrogatory No. 32.

7 Please state the DOCUMENT IDENTIFICATION of each DOCUMENT related to
8 YOUR allegation in COMPLAINT ¶ 34 that the NAMED DEFENDANTS or any of their
9 agents or employees “knew about, or should have known about, and failed to investigate
10 and/or properly investigate, prevent or remedy” any “retaliation and discrimination.”
11

12 Interrogatory No. 33.

13 For each INTERNAL GRIEVANCE that YOU made concerning any dust, cat hair,
14 fecal matter, and/or other “unsafe” working condition on the PROPERTY, please state the
15 INTERNAL GRIEVANCE IDENTIFICATION.

16 Interrogatory No. 34.

17 For each INTERNAL GRIEVANCE identified in Special Interrogatory No. 33
18 (concerning dust, cat hair, fecal matter, and/or other “unsafe” working condition on the
19 PROPERTY), please state the INTERNAL GRIEVANCE DESCRIPTION.
20

21 Interrogatory No. 35.

22 For each INTERNAL GRIEVANCE identified in Special Interrogatory No. 33
23 (concerning dust, cat hair, fecal matter, and/or other “unsafe” working condition on the
24 PROPERTY), please describe all facts supporting YOUR allegations in COMPLAINT that
25 the NAMED DEFENDANTS did nothing in response to such INTERNAL GRIEVANCE.
26

1
2
3 Interrogatory No. 36.

4 Please describe all facts supporting YOUR allegations in COMPLAINT ¶ 49 that
5 YOUR complaints about “unsafe workplace” were “motivating reasons and/or factors” in the
6 NAMED DEFENDANTS terminating YOU.

7 Interrogatory No. 37.

8 Please state the INDIVIDUAL IDENTIFICATION of each person who has personal
9 knowledge related to YOUR allegations in COMPLAINT ¶ 49 that YOUR complaints about
10 “unsafe workplace” were “motivating reasons and/or factors” in the NAMED
11 DEFENDANTS terminating YOU.

12
13 Interrogatory No. 38.

14 Please state the DOCUMENT IDENTIFICATION of each DOCUMENT related to
15 YOUR allegations in COMPLAINT ¶ 49 that YOUR complaints about “unsafe workplace”
16 were “motivating reasons and/or factors” in the NAMED DEFENDANTS terminating YOU.

17 Interrogatory No. 39.

18 For each INTERNAL GRIEVANCE that YOU made concerning any “unlawful
19 conduct” by the NAMED DEFENDANTS or by any of their agents or employees, please
20 state the INTERNAL GRIEVANCE IDENTIFICATION.

21
22 Interrogatory No. 40.

23 For each INTERNAL GRIEVANCE identified in Special Interrogatory No. 39
24 (concerning “unlawful conduct”), please state the INTERNAL GRIEVANCE
25 DESCRIPTION.

1
2 Interrogatory No. 41.

3 For each INTERNAL GRIEVANCE identified in Special Interrogatory No. 39
4 (concerning “unlawful conduct”), please describe all facts supporting YOUR allegations in
5 COMPLAINT that the NAMED DEFENDANTS did nothing in response to such
6 INTERNAL GRIEVANCE.
7

8 Interrogatory No. 42.

9 Please describe all facts supporting YOUR allegations in COMPLAINT ¶¶ 20 and 34
10 that YOUR complaints about “unlawful conduct” were “motivating reasons and/or factors” in
11 any conduct of the NAMED DEFENDANTS or of any of their agents or employees that
12 caused YOU to be harassed, discriminated against, retaliated against or terminated.
13

14 Interrogatory No. 43.

15 Please state the INDIVIDUAL IDENTIFICATION of each person who has personal
16 knowledge related to YOUR allegations in COMPLAINT ¶¶ 20 and 34 that YOUR
17 complaints about “unlawful conduct” were “motivating reasons and/or factors” in any
18 conduct of the NAMED DEFENDANTS or of any of their agents or employees that caused
19 YOU to be harassed, discriminated against, retaliated against or terminated.
20

21 Interrogatory No. 44.

22 Please state the DOCUMENT IDENTIFICATION of each DOCUMENT related to
23 YOUR allegations in COMPLAINT ¶¶ 20 and 34 that YOUR complaints about “unlawful
24 conduct” were “motivating reasons and/or factors” in any conduct of the NAMED
25 DEFENDANTS or of any of their agents or employees that caused YOU to be harassed,
26 discriminated against, retaliated against or terminated.
27

1
2 Interrogatory No. 45.

3 Please describe all facts supporting YOUR allegations in COMPLAINT ¶ 62 that
4 YOUR complaints about “violations of State and/or Federal law” were “a motivating factor
5 and/or reason” in the NAMED DEFENDANTS terminating YOU.
6

7 Interrogatory No. 46.

8 Please state the INDIVIDUAL IDENTIFICATION of each person who has personal
9 knowledge related to YOUR allegations in COMPLAINT ¶ 62 that YOUR complaints about
10 “violations of State and/or Federal law” were “a motivating factor and/or reason” in the
11 NAMED DEFENDANTS terminating YOU.
12

13 Interrogatory No. 47.

14 Please state the DOCUMENT IDENTIFICATION of each DOCUMENT related to
15 YOUR allegations in COMPLAINT ¶ 62 that YOUR complaints about “violations of State
16 and/or Federal law” were “a motivating factor and/or reason” in the NAMED
17 DEFENDANTS terminating YOU.
18

19 Interrogatory No. 48.

20 Please describe all facts supporting YOUR allegations in COMPLAINT ¶ 63 that the
21 NAMED DEFENDANTS “made, adopted, and enforced rules, regulations, and policies
22 preventing” YOU or anyone else “from disclosing information to government and law
23 enforcement agencies” concerning any alleged violation of law by the NAMED
24 DEFENDANTS.

25 / / / /

26 / / / /

1
2 Interrogatory No. 49.

3
4 Please state the INDIVIDUAL IDENTIFICATION of each person who has personal
5 knowledge related to YOUR allegations in COMPLAINT ¶ 63 that the NAMED
6 DEFENDANTS “made, adopted, and enforced rules, regulations, and policies preventing”
7 YOU or anyone else “from disclosing information to government and law enforcement
8 agencies” concerning any alleged violation of law by the NAMED DEFENDANTS.

9 Interrogatory No. 50.

10 Please state the DOCUMENT IDENTIFICATION of each DOCUMENT related to
11 YOUR allegations in COMPLAINT ¶ 63 that the NAMED DEFENDANTS “made, adopted,
12 and enforced rules, regulations, and policies preventing” YOU or anyone else “from
13 disclosing information to government and law enforcement agencies” concerning any alleged
14 violation of law by the NAMED DEFENDANTS.

15
16 Interrogatory No. 51.

17 In the light of YOUR allegations in COMPLAINT ¶¶ 17, 49 and 62 that YOU were
18 terminated on or about November 21, 2006, and also in the light of the TERMINATION
19 LETTER which is dated November 21, 2006, and also in the light of the DHS LETTER,
20 which is identically dated November 21, 2006 and contains no indication that it was
21 transmitted to CORPORATION by any means other than mailing, which mailing would have
22 been received by CORPORATION sometime after November 21, 2006, please describe all
23 facts that indicate any of the NAMED DEFENDANTS had any knowledge of any DHS
24 REPORT prior to terminating YOU.

25
26 / / / /

1
2
3 Interrogatory No. 52.

4 Please describe all facts refuting the PENDING DOWNSIZE HEDGE DEFENSE.

5 Interrogatory No. 53.

6 Please state a full accounting of all damages YOU seek to recover in this action.

7
8 Interrogatory No. 54.

9 For each INJURY, please describe all facts supporting YOUR allegation that YOU
10 have suffered such INJURY.

11 Interrogatory No. 55.

12 For each PERMANENT INJURY, please describe all facts supporting YOUR
13 allegation that YOU have suffered such PERMANENT INJURY, including all facts
14 supporting the reasonable certainty that it is permanent.

15
16 Interrogatory No. 56.

17 Please state the INDIVIDUAL IDENTIFICATION of each PHYSICIAN who has
18 examined and/or treated YOU at any time in the past 15 years.

19 Interrogatory No. 57.

20 For each PHYSICIAN identified in Special Interrogatory No. 56, please describe the
21 purpose for YOUR visiting the PHYSICIAN.

22
23 Interrogatory No. 58.

24 For each PHYSICIAN identified in Special Interrogatory No. 56, please describe any
25 diagnosis of YOU made by the PHYSICIAN.

1
2 Interrogatory No. 59.

3 For each PHYSICIAN identified in Special Interrogatory No. 56, please describe any
4 treatment of YOU undertaken by the PHYSICIAN.
5

6 Interrogatory No. 60.

7 For each treatment described in Interrogatory No. 59, please describe the result of
8 such treatment.
9

10 Interrogatory No. 61.

11 Please describe all facts refuting the NON-ABLE-BODIED DEFENSE.

12 Interrogatory No. 62.

13 For each OTHER LITIGATION, please state the LITIGATION IDENTIFICATION.
14

15 Interrogatory No. 63.

16 In the light of YOUR allegations in COMPLAINT ¶¶ 7 and 31 that YOU were
17 employed by the “Defendants,” please describe all facts establishing that YOU were
18 employed by the DIXONS (as opposed to YOUR being employed by CORPORATION).
19

20 Interrogatory No. 64.

21 In the light of YOUR allegations in COMPLAINT ¶¶ 7 and 31 that YOU were
22 employed by the “Defendants,” please state the INDIVIDUAL IDENTIFICATION of each
23 person who has personal knowledge related to YOUR being employed by the DIXONS (as
24 opposed to YOUR being employed by CORPORATION).
25

26 / / / /

27 / / / /

1
2
3 Interrogatory No. 65.

4 In the light of YOUR allegations in COMPLAINT ¶¶ 7 and 31 that YOU were
5 employed by the “Defendants,” please state the DOCUMENT IDENTIFICATION of each
6 DOCUMENT related to YOUR being employed by the DIXONS (as opposed to YOUR
7 being employed by CORPORATION).

8 Interrogatory No. 66.

9 Please describe all facts that would support YOUR holding the DIXONS personally
10 liable for the obligations of CORPORATION in this action (i.e. “piercing the corporate
11 veil”).

12
13 Interrogatory No. 67.

14 Please state the INDIVIDUAL IDENTIFICATION of each person who has personal
15 knowledge related to YOUR holding the DIXONS personally liable for the obligations of
16 CORPORATION in this action (i.e. “piercing the corporate veil”).

17 Interrogatory No. 68.

18 Please state the DOCUMENT IDENTIFICATION of each DOCUMENT related to
19 YOUR holding the DIXONS personally liable for the obligations of CORPORATION in this
20 action (i.e. “piercing the corporate veil”).
21

22 Dated: _____

[redacted]

23
24
25 [redacted, Attorneys for Defendants DIXON
26 FURNITURE, INC., NANCY DIXON, and
MATT DIXON.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit 1
TERMINATION LETTER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Exhibit 2
DHS LETTER

1
2
3 **DECLARATION FOR ADDITIONAL DISCOVERY**
4

5 I, [redacted], declare:

6 1. I am the attorney for Defendants DIXON FURNITURE, INC., NANCY DIXON,
7 and MATT DIXON, who are parties to this action.

8 2. I am propounding to Plaintiff TOM BROWN the attached set of interrogatories.

9 3. This set of interrogatories will cause the total number of specially prepared
10 interrogatories propounded to the party to whom they are directed to exceed the number of
11 specially prepared interrogatories permitted by Section 2030.030 of the Code of Civil
12 Procedure.

13 4. I have previously propounded a total of zero interrogatories to this party.

14 5. This set of interrogatories contains a total of 68 specially prepared interrogatories.

15 6. I am familiar with the issues and the previous discovery conducted by all of the
16 parties in the case.

17 7. I have personally examined each of the questions in this set of interrogatories.

18 8. This number of questions is warranted under Section 2030.040 of the Code of Civil
19 Procedure because of the large number of allegations in the Plaintiff's Complaint and the
20 complexity of the matters alleged.

21 9. None of the questions in this set of interrogatories is being propounded for any
22 improper purpose, such as to harass the party, or the attorney for the party, to whom it is
23 directed, or to cause unnecessary delay or needless increase in the cost of litigation.

24 / / / /

25 / / / /

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

I declare under penalty of perjury under the laws of California that the foregoing is true and correct, and that this declaration was executed on March ____, 2008 at Los Angeles, California.

Attorney for Defendants DIXON FURNITURE, INC., NANCY DIXON, and MATT DIXON.